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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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December 2, 2010

Jeff Woled, MS 22A
California Department of Toxic Substances Control
Office of Legislation & Regulatory Policy
P.O. Box 806
Sacramento, CA 95812-0806

Dear Mr. Woled:

**GREEN CHEMISTRY INITIATIVE: PROPOSED REGULATION FOR SAFER
CONSUMER PRODUCT ALTERNATIVES DATED NOVEMBER 2010
REQUEST FOR EXTENSION OF THE COMMENT PERIOD**

The Los Angeles County Integrated Waste Management Task Force (Task Force) would like to request an extension on the Department of Toxic Substances Control's (DTSC) final comment period for the Green Chemistry Initiative Proposed Regulation for Safer Consumer Product Alternatives.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939, as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities, and to ensure a coordinated, cost-effective, and environmentally-sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a County-wide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, the County of Los Angeles Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

The Task Force is always ready to aid in the development of solid waste management policies that are protective of public health, the environment, and the economic well-being of Los Angeles County residents and businesses. The Task Force has commented on each version of the draft form of the regulations at each step in the process. However, the current comment period created challenges in that the draft regulations released for a two-week comment period on November 16, 2010, are

significantly different as compared to the previous version and includes many new changes. This requires substantially more time to review and submit comment for those public entities, such as the Task Force, that must operate consistent with requirements of the California Brown Act. Additionally, the Thanksgiving holiday falling in the midst of the two-week comment period makes it exceedingly more challenging for interested stakeholders, such as the Task Force and local governments, to review and provide meaningful comment regarding the draft regulations.

Therefore, given the substantial changes, complexity, and importance of these regulations, the Task Force respectfully requests an extension on the final comment period for the Green Chemistry Initiative Proposed Regulation for Safer Consumer Product Alternatives. If you have any questions, please contact Mr. Mike Mohajer at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Council Member, City of Rosemead

MS:ts

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cc: Maziar Movassaghi, Acting Director, Department of Toxic Substances Control
California Product Stewardship Council
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each City Manager in Los Angeles County