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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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May 8, 2013

Jackie Buttle
Acting Regulations Coordinator
Department of Toxic Substances Control
PO Box 806
Sacramento, CA 95812-0806

Dear Ms. Buttle:

COMMENTS REGARDING PROPOSED DRAFT REGULATIONS FOR SAFER CONSUMER PRODUCT ALTERNATIVES

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express support for, and appreciates the opportunity to comment on, the proposed regulations for Safer Consumer Product Alternatives (Regulations) that the Department of Toxic Substances Control (DTSC) is currently developing.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [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 countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

The proposed Regulations are an integral part of California's Green Chemistry Initiative, and the Task Force appreciates the involvement of affected stakeholders and the general transparency of the process. The Task Force also appreciates that DTSC has addressed and incorporated one of our suggestions from our previous comments on the Regulations. The subsection for Alternative End-of-Life Programs has been strengthened by the revision to require manufacturers to prove that there is an agreement to participate at the appropriate level as it will ensure that accountability for the success of the program lies with manufacturers.

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In light of DTSC's request to limit the scope of comments to only the latest revisions to the regulations, we have no further comment at this time. Although not all of the Task Force's submitted comments were incorporated into the final draft, we believe the Regulations as currently drafted represent an important step forward in mitigating the impacts of potentially hazardous products and encouraging more sustainable designs for a host of products. We appreciate the substantial amount of work involved in getting to this point in the process and DTSC's open and transparent process in developing the Regulations and accepting comments.

We look forward to continuing to work constructively with DTSC staff on this and other related issues. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@yahoo.com or (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

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cc: Debbie Raphael, Director, Department of Toxic Substances Control
Matt Rodriguez, Secretary of the California Environmental Protection Agency
Each Member of the County of Los Angeles Board of Supervisors
California State Association of Counties
California Product Stewardship Council
League of California Cities, Los Angeles Division
Southern California Association of Governments
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Gateway Cities Council of Governments
Each City Recycling Coordinator in Los Angeles County
Each Member of the Los Angeles County Integrated Waste Management Task Force