



# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

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November 13, 2007

IN REPLY PLEASE  
REFER TO FILE: EP-2

Mr. Michael Wochnick  
California Integrated Waste Management Board  
Permitting and Enforcement Division  
P.O. Box 4025 MS WC/CCFAD10A-18  
Sacramento, CA 95812-4025

Dear Mr. Wochnick:

### **PROPOSED REGULATIONS ON LANDFILL CLOSURE AND POSTCLOSURE COST ESTIMATES—AUGUST 3, 2007, VERSION**

Thank you for the opportunity to provide comments on the proposed Landfill Closure and Postclosure cost Estimate Regulations. We would like to commend the California Integrated Waste Management Board (Waste Board) and its staff for their efforts in developing the proposed regulations. These regulations are complex in nature and have far-reaching public policy consequences.

The following comments are provided:

1. Title 27, Division 2, Chapter 4, Subchapter 4, Section 21790: CIWMB— Preliminary Closure Plan Contents, Page 2.

*Specific Request* – Expand Subsection (b)(8) to add a new item (G) to read as follows:  
"(G) Site Re-Vegetation and Landscaping."

*Discussion* – We believe a Landfill, like any other business, should complement and enhance the community. Therefore, the plan should include the cost to re-vegetate and landscape the site so as to enhance and blend with the surrounding community. The site, upon closure or during post-closure maintenance period, should not degrade or become an eye-sore to the community.

2. Title 27, Division 2, Chapter 4, Subchapter 4, Section 21815, Page3, Line 18.

*Specific Request* – We support the proposed item (d) "Cost estimates shall include the cost for all activities yet to be completed even if the activity is tentatively planned to occur or be completed prior to closure or completion of postclosure maintenance"

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Discussion – The subject statement is appropriate as part of the Phase I closure and postclosure maintenance cost estimate regulations since it affects the Plans Content and what environmental protection and control system activities must be included in determining the closure or postclosure maintenance cost estimates. This is an important step in not only ensuring that landfills operate under the most appropriate technical and environmental standards protecting public health, safety and the environment, but also in ensuring that the citizens of California are not left holding the bag at anytime during the closure or postclosure maintenance period, should the owner/operator default on its obligations or be in bankruptcy. We believe that the statement is consistent with the intent of AB 2296 which requires the Waste Board adopt this year a set of regulations that deal with improving the closure and post closure maintenance cost estimates.

3. Title 27, Division 2, Chapter 4, Subchapter 4, Section 21820(b)(3), CIWMB–Closure Cost Estimates, Page 4, Line 24.

Specific Request – Expand Subsection (b)(3) to add a new item (F) to read as follows: "(F) Site Re-Vegetation and Landscaping."

Discussion – We believe a Landfill, like any other business, should complement and enhance the community. Therefore, the plan should include the cost to re-vegetate and landscape the site so as to enhance and blend with the surrounding community. The site, upon closure or during post-closure maintenance period, should not degrade or become an eye-sore to the community.

We thank you for your consideration of this request regarding issues that are of great importance to local governments. If you have any questions, please contact me at (626) 458-3502, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

DONALD L. WOLFE  
Director of Public Works



CARLOS RUIZ  
Assistant Division Engineer  
Environmental Programs Division

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cc: Each Member of the California Integrated Waste Management Board  
Executive Director, California Integrated Waste Management Board (Mark Leary)  
California Integrated Waste Management Board (Ted Rauh)  
Each Member of the Los Angeles County Integrated Waste Management Task Force  
Department of Public Health (Ken Murray, Gerry Villalobos)