



SWANA[®]
SOLID WASTE ASSOCIATION
of North America

CALIFORNIA CHAPTERS

FOUNDING

SIERRA

GOLDRUSH

LEGISLATIVE TASK FORCE

www.swanacal-leg.org

LEGISLATIVE ADVOCATES

PAUL J. YODER

Shaw/Yoder, Inc.

1415 L Street, Suite 200

Sacramento, CA 95814

(916) 446-4656

FAX (916) 446-4318

paul@shawyoder.org

CHAIR

GRACE CHAN

LA County Sanitation Districts

1955 Workman Mill Road

Whittier, CA 90601

(562) 699-7411 ext. 2402

gchan@lacsds.org

VICE CHAIR

WILLIAM MERRY

Monterey RWMD

14201 Del Monte Boulevard

P.O. Box 1670

Marina, CA 93933

(831) 384-5313

wmerry@mrwmd.org

TREASURER

NANCY L. EWERT, P.E.

Kern County

2700 M Street, Suite 500

Bakersfield, CA 93301

(661) 862-8933

newert@co.kern.ca.us

SECRETARY

MARK URQUHART P.E.

Senior Project Manager

HDR ONE COMPANY

2365 Iron Point Rd. #300

Folsom, CA 95630

(916) 817-4933

Mark.Urquhart@hdrinc.com

August 8, 2008

Ms. Margo Reid Brown

Chair, California Integrated Waste Management Board

1001 I Street

Sacramento, CA 95814

Dear Ms. Brown:

COMMENTS on Strategic Policy Development Committee Meeting,
August 12, 2008, Agenda Item B:

**Discussion of Implementation of and Request for Rulemaking Direction
to Formally Notice the 45-Day Comment Period for Amendments to
Existing Regulations Regarding Active Disposal Site Gas Monitoring and
Control**

On behalf of the Solid Waste Association of North America Legislative Task Force (LTF), I would like to thank you for the opportunity to comment on the above-referenced agenda item. The LTF has reviewed the staff report and recommendation and are in support of the modified schedule under consideration. The timeline will facilitate enhanced clarity and review as well as provide time for administrative requirements such as CEQA and formal bidding processes particularly as required of public agencies. Due to the uncertainty that is inherent in these administrative requirements, we respectfully request that some flexibility be allowed in the proposed regulations for unforeseen circumstances beyond the control of the operator in the September 21, 2009 compliance deadline that is being considered.

We appreciate your consideration of this letter and we look forward to working with you on this issue and would be happy to provide further technical information from our members as you feel would be useful.

Sincerely,

Paul Yoder

Legislative Advocate

CC: Board Members, California Integrated Waste Management Board
Mark Leary, Executive Director, California Integrated Waste
Management Board
Members, Solid Waste Association of North America, Legislative
Task Force