

Enforcement Advisory Council

Solid Waste Management through Partnership

May 19, 2014

Mark de Bie, Deputy Director
Waste Permitting, Compliance, and Mitigation Division
Department of Resources, Recycling and Recovery
P.O. Box 4025
Sacramento, CA 95812-4025

Subject: Enforcement Advisory Council Resolution No. 2014-04 –
LEA Inspections at Partial Closed Sites

Dear Mr. de Bie:

On May 6, 2014, the Enforcement Advisory Council (EAC) voted to approve the attached EAC Resolution No. 2014-04 as a formal request and advice to CalRecycle with respect to LEA inspections conducted at active landfills that have implemented partial and/or partial final closure activities.

As a result of recent changes made in the Solid Waste Information System to the Unit status of certain landfills that have completed partial closure activities in accordance with an approved Partial Final Closure Plan, LEAs in those jurisdictions have identified concerns and challenges in documenting inspection findings for these closed areas on the active inspection report (CIWMB Form 52). Specifically, there is an expressed need to allow options to more appropriately cite closure and/or postclosure maintenance standards that have been tailored in regulation to closed areas or units at an active landfill.

The attached resolution requests written guidance to LEAs for inspecting partial closed sites and a consideration of the appropriate use of specific closure standards for enforcement at these landfills when incremental or phased closures have occurred, fully acknowledging that the overall site has not been certified closed or entered the post-closure maintenance period for the purposes of financial assurance demonstrations.

The EAC respectfully requests that CalRecycle carefully consider the attached resolution and provide written direction as deemed appropriate. If you have any questions or need further clarification, please feel free to contact me at 760-336-8530 or by email at larsseifert@co.imperial.ca.us.

Sincerely,



Lars Seifert, Chair
Enforcement Advisory Council

Attachment: *EAC Resolution No. 2014-04*