
From: Mike Mohajer [MikeMohajer@yahoo.com]
Sent: Sunday, April 29, 2012 4:04 PM
To: Paint Product Stewardship
Cc: Mortensen, Carol; Levenson, Howard
Subject: Proposed Regulation for Architectural Paint Recovery Program Dated 4/13/2012 - Fourth 15-Day Public Comment Period



TO: Cynthia Dunn
Materials Management and Local Assistance Division
Department of Resources Recycling and Recovery (CalRecycle)

FROM: Mike Mohajer, Member
Los Angeles County Integrates Waste Management Task Force

PROPOSED REGULATION FOR ARCHITECTURAL PAINT RECOVERY PROGRAM, DATED APRIL 13, 2012 – FOURTH 15-DAY PUBLIC COMMENT PERIOD

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), I would like to express the Task Force's appreciation for the opportunity to review and comment on the subject Regulation. The following is offered.

Previously, the Task Force in concert with the County of Los Angeles, the County Sanitation Districts of Los Angeles County, and the City of Los Angeles had submitted extensive comments on versions of the subject Regulation. Among our comments as recognized by the State Office of Administrative Law (Finding No. 3) we had emphasized that there is a critical need for the proposed Regulation to address and require the paint manufacturers and/or paint stewardship organizations to collaborate and coordinate efforts with local governments conducting household hazardous waste collection programs. The Task Force would commend CalRecycle for partially addressing this concern through the revisions incorporated into Sections 18953 and 18954 of the proposed Regulation dated April 13, 2012. However, the Task Force strongly recommends that:

- Paragraph (B) of Subdivision 18954 (a)(3) to be revised/expanded to specifically require the location of **each** type of collection points (i.e. mobile, temporary, permanent and retail stores), emphasis added.
- Paragraph (D) of Subdivision 18954 (a)(3) – This Paragraph needs to be expanded by requiring “the manufacturer or stewardship organization” to identify and list each existing household hazardous waste collection program and each retailer that the Program was coordinated with during the reporting period.

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 by the County and the 88 cities in the County of Los Angeles with a combined population equivalent to approximately one-third of the California population. Consistent with these responsibilities and to ensure a coordinated and cost-effective solid waste management system in the County of Los Angeles, the Task Force also addresses issues impacting the solid waste management system on a countywide 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 governmental agencies

The Task Force appreciate your consideration of the foregoing recommendations. Should you have any questions, please contact me via email or by phone at 909-592-1147. Thank you

CC: Each Member of the Los Angeles County IWM Task Force
Los Angeles County Department of Public Works
County Sanitation Districts of Los Angeles County
City of Los Angeles Bureau of Sanitation