



January 31, 2011

Ms. Ellen Lorscheider
Planning and Programs Branch Head
1646 Mail Service Center
Raleigh, NC 27699-1646

RE: Revisions to Proposed Changes to Solid Waste Management Rules

Dear Ms. Lorscheider:

On behalf of the North Carolina Solid Waste Association of North America (NC SWANA), the following represents the NC SWANA Technical Committee's comments to the proposed changes to the NC Solid Waste Management Regulations (NCSWMR) as presented in the North Carolina Register Volume 25, Issue 04, pages 465-482 on August 16, 2010. Please enter these comments into the official record for consideration.

SWANA, a national organization, is dedicated to *"Advancing the practice of environmentally and economically sound management of municipal solid waste in North America"* and serves over 7,600 members nationwide. NC SWANA represents *"public and private solid waste professionals in North Carolina with the objective of developing and enhancing professionals in the field through environmentally sound and productive, innovative, economically competitive, and effective integrated municipal solid waste management systems with necessary and reasonable enforcement."* NC SWANA members design, permit, develop, and operate solid waste/recycling collection, processing, and disposal systems, and their mission includes the critical responsibility of protection of public health and the environment.

We appreciate the Division of Waste Management's willingness to meet with stakeholders, including NC SWANA representatives, to discuss the proposed rule changes. Two working groups including members of NC SWANA and the solid waste community met with Division staff during the comment period to discuss the specific intent of the proposed changes. The meetings were both productive and informative.

Following the December 2, 2010 stakeholders meeting with Division staff, comments were submitted to you related to the proposed changes to the groundwater monitoring rules, 15A NCAC 13B .1632 - .1635 and .1637. On January 14, 2011, representatives from the Division sent a revised version of the proposed language to NC SWANA. The purpose of the revision was to address comments received from the stakeholders.

The NC SWANA Technical Committee has reviewed the revised version of the proposed changes to the above-referenced regulation sections and we fully support them as revised.

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Thank you for your support in facilitating stakeholder meetings and in considering the suggestions provided by the group.

Respectfully,

North Carolina Chapter of SWANA



Michele Sakwa
Chapter President



Joe Readling, PE
Technical Committee Chair