



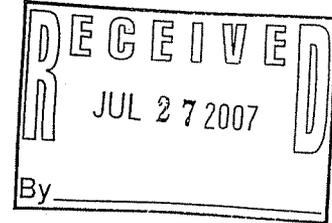
# Maricopa County

Environmental Services

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July 24, 2007

Mr. Patrick J. Cunningham  
Deputy Director  
Arizona Department of Environmental Quality  
1110 West Washington Street  
Phoenix, AZ 85007



RE: R 18-13-308 Frequency of Collection

Dear Mr. Cunningham:

I am writing to you to express my concern over the proposal from the National Solid Waste Management Association to do away with the variance requirement for once a week garbage collection with recycling.

The purpose of twice a week garbage collection is to break the fly breeding cycle. Especially in warm climates it can take as little as three to four days for flies to advance through the three larvae stages from egg into new adult flies. As you are aware, the domestic fly mechanically transmits organisms that cause bacillary dysentery, infantile diarrhea, typhoid fever, paratyphoid fever, cholera, amoebic dysentery, giardiasis, and pinworm, roundworm and tape worm infections.

In the place of an aggressive twice weekly garbage collection program, it is important that all garbage, especially organic matter, be placed in plastic bags and securely tied. Maricopa County's variance program requires each solid waste collection agency that does not provide twice weekly service to enforce a "Bag and Tie Program". It is Maricopa County's role to provide inspection services for a percentage of the variance containers as a quality control and to verify the solid waste agencies' compliance with their variance conditions. It has been our experience that while most citizens do comply with the bag and tie requirements, there have been occasions that a group or an area has substantially failed to comply. In these cases the Department had no other alternative in than take steps to revoke the variance and require the resumption of twice weekly collection in order to protect the public health.

It is the Department's position that the variance process is essential to ensure protection of public health. We reject the NSWMA position that the formal variance

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is a regulatory burden. We oppose the elimination of the variance process for entities that wish to go to once a week collection.

If you have any questions or require additional information, please give me a call.

Sincerely,



John A. Power  
Director  
Environmental Services