

Permitting & Assistance Branch Staff Report
Solid Waste Facilities Permit Revision for the Contra Costa Transfer and Recovery Station
SWIS No. 07-AA-0027
November 23, 2011

Background Information, Analysis, and Findings:

This report was developed in response to the Contra Costa County Local Enforcement Agency (LEA) request for the Department of Resources Recycling and Recovery (Department) concurrence on the issuance of a proposed Solid Waste Facilities Permit (SWFP) revision for the Contra Costa Transfer and Recovery Station, SWIS No. 07-AA-0027, located in Contra Costa County, owned and operated by Allied Waste Industries. A copy of the proposed permit is attached. This report contains the Permitting & Assistance Branch staff's analysis, findings, and recommendations.

The proposed permit was received on November 18, 2011. A previous proposed permit was received on September 28, 2011. Action must be taken on this proposed permit no later than January 17, 2012. If no action is taken by January 17, 2012, the Department will be deemed to have concurred with the issuance of the proposed revised permit.

Proposed Changes

The following changes to the permit are being proposed:

	Current Permit (2001 SWFP)	Proposed Permit
Name & mailing Address of Owner	BFI of California, Inc. 441 N. Buchanan Pacheco, CA 94553	Allied Waste 951 Waterbird Way Martinez, CA 94553
Permitted Operations	Transfer Station and Wood grinding activity	Transfer Station, Processing Facility and Wood grinding activity
Permitted Tons per Operating Day	1900 Total: Tons/Day Non-Hazardous-General ...1900 Tons/Day Non-Hazardous- Separated or comingled recyclables1900 Tons/Day	1900 Total: Tons/Day Non-Hazardous-General ...1900 Tons/Day Non-Hazardous- Separated or comingled recyclables1900 Tons/Day Commercial Food Waste 60 Tons/Day
13. Findings	A. This facility is consistent with the Contra Costa County-wide Integrated Waste Management Plan. Public Resource Code, Section 50001. B. This permit is consistent with the standards adopted by the CIWMB. Public Resource Code 44010. C. The design and operation of the facility is consistent with the State Minimum Standards for Solid Waste Handling and Disposal as determined by the LEA.	A. The facility is also consistent with the Contra Costa County Integrated Waste Management Plan, which was approved by the CalRecycle on May 1993. The location of the facility is identified in the Countywide Non- Disposal Facility pursuant to Public Resources Code, Section 50001. B. This permit is consistent with the standards adopted by the CalRecycle. Public Resources Code, Section 44010. C. The design and operation of the facility is in compliance with the State

	<p>D. The Contra Costa County Fire District has determined that the facility is in conformance with applicable fire standards as required by Public Resource Code, Section 44151.</p> <p>E. An environmental determination is filed with the State Clearing house for all facilities that are not exempt from the California Environmental Quality Act and documentation pursuant to Public Resource Code, Section 21081.6.</p> <p>F. The Contra Costa County-wide Integrated Waste Management Plan has been approved by the California Integrated Waste Management Board (May 1993).</p> <p>G. The following authorization agent has made a determination that the facility is consistent with, and designated, the Contra Costa County General Plan: Contra Costa County Board of Supervisors, Public Resourced code, Section 50000.5(a).</p> <p>H. The County of Contra Costa has made a written finding that the surrounding land uses are compatible with the facility operation pursuant to Public Resources Code, Section 50000.5(b): Board of Supervisors.</p>	<p>Minimum Standards for solid waste handling and disposal as determined by the LEA. PRC Section 44009</p> <p>D. The Contra Costa County Fire Protection District has determined that the facility is in conformance with applicable fire standards as required by Public Resources Code, Section 44151.</p> <p>E. The EIR SCH#86090906 was certified and project approved by Board of Supervisors on December 15, 1987 for development and operation of this site.</p> <p>F. A Mitigated Negative Declaration (MND) was filed with the State Clearinghouse (SCH #2010122061) and certified by Contra Costa Environmental Health on April 7, 2011. The MND describes and supports the design and operation, which will be authorized by the issuance of this permit. A Notice of Determination was filed with the State Clearinghouse on April 12, 2011.</p>
<p>14. Prohibitions</p>	<p>The permittee is prohibited from accepting any liquid waste, septage, sludge, ash, dead animal, large construction/demolition waste, non-hazardous waste requiring special handling, medical waste, designated waste, radioactive waste, highly flammable or pyroforic wastes, or hazardous waste unless such waste is specifically listed below, and unless the acceptance of such waste is authorized by all applicable permits.</p> <p>The permittee is additionally prohibited from burning waste and scavenging or salvaging by the public.</p>	<p>The permittee is prohibited from accepting any liquid waste, septage, sludge, ash, dead animals, large construction/demolition waste, non-hazardous waste requiring special handling, medical waste, designated waste, radioactive waste, highly flammable or pyroforic wastes, or hazardous waste unless such waste is specifically identified in the Transfer Processing Report for this facility and amendments there to and as approved by the LEA and other federal, state, and local agencies.</p> <p>The permittee is additionally prohibited from burning wastes and scavenging or salvaging by the public.</p>

		Food waste operation on weekends is prohibited. Storage of collected or processed food waste overnight or over weekends is prohibited. Outdoor processing of collected food waste is prohibited.
15. Documents	<p>Report of Facility Information November 2000</p> <p>Land Use Permit No 2122-86, Amendments 1 & 2</p> <p>BAAQMD Permit to Operator, Exp Nov 2001</p> <p>California Environmental Impact Report, State Clearing house No. 86090906, Sept 1987</p> <p>Lease Agreements- owner & operator, Mar 1994</p> <p>Contra Costa County Fire Protection District, June 1995</p> <p>RQWCB Waste Discharge Requirements, Waiver Granted for Water Quality Certification, Dec 1992</p> <p>California Water Resources Control Board General Permit to Discharge Associated with Industrial Activity, Sept 1990</p> <p>LEA Permit Review Report, June 1997</p> <p>CIWMB Waste Tire Facility Exclusion #07-TI-0171, Aug 1995</p>	<p>Amended Report of Station Information/Transfer Processing Report, March 2011 (RSI/TPR) or most recent approved version or amendment.</p> <p>RWQCB Waste Discharge Requirements, Waiver Granted for Water Quality Certification, Dec. 1992</p> <p>Land Use Permit No. 2122-86, Amendments 1 & 2 amended April 21, 1992 or most Current Permit issued</p> <p>Contra Costa County Ordinances Code, Chapter 418-4</p> <p>BAAQMD Permit to Operate, Exp. Nov. 2001 or most Current Permit issued</p> <p>California Water Resources Control Board General Permit</p> <p>California Environmental Impact Report, to Discharge Associated with Industrial Activity, Sept. 1990 State Clearinghouse No. 86090906, Sept. 1987</p> <p>California Environmental Quality Act, Final/Mitigated Negative Declaration (State Clearinghouse No. 2010122061), April 2011</p> <p>Lease Agreements – owner & operator, Mar. 1994</p> <p>CIWMB Waste Tire Facility Exclusion #07-TI-0171, Aug. 1995</p> <p>Contra Costa County Fire Protection District, June 1995</p>
16. Self Monitoring		13. Operator shall provide reports to the LEA per Section 13 of Operations Appendix F, and Section III E, Operations Plan in the amended RSI/TPR or upon request from the LEA.

		<p>Reports shall include but not be limited to, statistical summaries of the tonnage of food waste processed; problems or special occurrence encountered; and prospective refinements to food waste recovery operations and/or procedures for consideration by the LEA.</p> <p>14. Operator shall implement the Mitigation Monitoring and Reporting Plan as described in Appendix D of the IS/MND until such time as the LEA deems the goals and objective of the mitigation have been achieved.</p>
<p>17. Enforcement Agency (EA) Conditions</p>	<p>Conditions A. - C.</p> <p>D. The Station has a maximum combined total permitted capacity of 1900 tons per operating day and shall not receive more than this amount without first obtaining a revision of the permit.</p> <p>E. The facility shall comply with all applicable federal, state, and local enactments for solid waste handling.</p> <p>F. This facility shall comply with all mitigation measures previously identified in the EIR and prepared pursuant to Public Resources Code, Section 21081.6.</p> <p>G. The Local Enforcement Agency may prohibit or condition the handling of solid waste to protect the public health or safety or to mitigate adverse environmental impacts.</p> <p>H. The operator shall maintain copies of all inspection reports and permits issued by the LEA or other agencies at the facility. These documents shall be made available to authorized representatives of regulatory agencies and to facility personnel during normal business hours.</p> <p>I. Any additional information required by the LEA shall be furnished to agency personnel on request.</p> <p>J. The operator shall comply with all</p>	<p>No changes to conditions A.- C.</p> <p>D. The Station has a maximum combined total permitted capacity of 1900 tons per operating day and shall not receive more than this amount including Recyclables and Commercial Food Waste (60 tons per day maximum) without first obtaining a revision of the permit.</p> <p>E. This facility shall comply with all mitigation measures previously identified in the EIR, MND, and prepared pursuant to Public Resources Code, Section 21081.6. under the jurisdiction of the LEA for design and operation of facility</p> <p>F. The operator shall comply with all applicable federal, state, and local requirements and enactments, including mitigation and monitoring measures developed in accordance with any certified environmental documents filed pursuant to Public Resources Code (PRC) Section 21081.6, and administrative or enforcement orders of all regulatory agencies with jurisdiction at this facility.</p> <p>G. The Local Enforcement Agency may prohibit or condition the handling of solid waste to protect the public health or safety or to mitigate adverse environmental impacts.</p> <p>H. The operator shall maintain copies</p>

	<p>applicable laws pertaining to employee health and safety. The operator shall maintain a written safety plan. All facility personnel shall be familiar with said plan and the plan shall be maintained on-site and available for review during normal business hours.</p> <p>K. All solid waste received Sunday through Friday shall be removed from the facility within 24 hours. Since the accepting landfill is closed on Sundays, all solid waste received on Saturdays must be removed from the facility within 48 hours.</p> <p>L. The facility shall be patrolled for litter on a daily basis. Litter shall be collected more frequently as necessary to prevent it from migrating off-site.</p> <p>M. The operator shall maintain an LEA-approved hazardous and prohibited waste screening/exclusion program at the facility. On-site load checking shall occur at the frequencies in the Load Check Program or more often by personnel trained in such activities. Any hazardous materials found shall be set aside in a secure area and removed within 180 days if the volume does not exceed 6,000 kilograms (13,228 lbs) at any one time. If the volume reaches the capacity of the secured area or the volume exceeds 6,000 kilograms, the hazardous materials must be removed off-site immediately.</p> <p>N. The operator shall clean the tipping floor daily. The LEA reserves the right to require the operator to provide additional measure(s) of cleaning the tipping floor if the proposed method proves inadequate or ineffective in removing grease, oil and other residues.</p> <p>O. The LEA reserves the right to require the operator to provide more stringent dust control and ventilation measures, if the current method and/or system proves inadequate.</p> <p>P. The operator shall install and</p>	<p>of all inspection reports and permits issued by the LEA or other agencies at the facility. These documents shall be made available to authorized representatives of regulatory agencies and to facility personnel during normal business hours.</p> <p>I. Any additional information required by the LEA shall be furnished to agency personnel on request.</p> <p>J. The operator shall maintain a written safety plan for public safety. All facility personnel shall be familiar with said plan and the plan shall be maintained on-site and available for review during normal business hours. A copy of the Site Safety Plan shall be provided to the LEA within 30 days of the issuance of this permit and when updated or requested by the LEA.</p> <p>K. All solid waste received Sunday through Friday shall be removed from the facility within 24 hours. Since the accepting landfill is closed on Sundays, all solid waste received on Saturdays must be removed from the facility within 48 hours.</p> <p>L. The facility shall be patrolled for litter on a daily basis. Litter shall be collected more frequently as necessary to prevent it from migrating off-site.</p> <p>M. The operator shall maintain an LEA-approved hazardous and prohibited waste screening exclusion program at the facility. On-site load checking shall occur at the frequencies in the Load Check Program or more often by personnel trained in such activities. Any hazardous materials found shall be set aside in a secure area and removed within 180 days if the volume does not exceed 6,000 kilograms (13,228 lbs) at any one time. If the volume reaches the capacity of the secured area or the volume exceeds 6,000 kilograms, the hazardous materials must be removed off-site immediately.</p> <p>N. The operator shall clean the tipping</p>
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	<p>maintain a sign at the entrance indicating that no hazardous or liquid wastes are accepted and that all vehicles entering the facility must be fully covered.</p> <p>Q. Salvaged and recyclable material, except waste tires, shall be removed within 30 days unless otherwise determined by the LEA.</p> <p>R. Transfer trailer and vehicle wash down shall occur in the CCTRS truck wash area or an area approved by the LEA.</p> <p>S. The facility shall comply with all applicable federal, state, and local enactments regarding the waste tire facility.</p> <p>T. The facility shall comply with all applicable federal, state, and local enactments regarding the wood grinding operation.</p> <p>U. Putrescible green waste shall be segregated from the non-putrescible green and wood waste at the wood grinding operation, and removed off-site within 48 hours.</p> <p>V. The storage of green and wood material, feedstock and/or ground material for the wood grinding operation, shall be limited to the volume of the LEA-approved designated pad or the LEA-approved maximum weight or to a maximum time limit of 14 days, whichever is reached first.</p> <p>W. This SWF Permit is subject to review by the LEA and may be suspended, revoked or modified at any time for sufficient cause.</p> <p>X. This SWF Permit supersedes the solid waste facility permit issued August 24, 1998.</p>	<p>floor at a minimum daily after the last load of public waste is received and before 7:00 PM. The LEA reserves the right to require the operator to provide additional measure(s) of cleaning the tipping floor if the proposed method proves inadequate or ineffective in removing grease, oil and other residues.</p> <p>O. The LEA reserves the right to require the operator to provide more stringent dust control and ventilation measures, if the current method and/or system proves inadequate.</p> <p>P. The operator shall maintain a sign at the entrance indicating that no hazardous or liquid wastes are accepted and that all vehicles entering the facility must be fully covered.</p> <p>Q. Salvaged and recyclable material, except waste tires, shall be removed within 30 days unless otherwise determined by the LEA.</p> <p>R. Transfer trailer and vehicle wash down shall occur in the CCTRS truck wash area or an area approved by the LEA.</p> <p>S. Putrescible green waste shall be segregated from the non-putrescible green and wood waste at the wood grinding operation, and removed off-site within 48 hours.</p> <p>T. The storage of green and wood material, feedstock and/or ground material for the wood grinding operation, shall be limited to the volume of the LEA-approved designated pad or the LEA-approved maximum weight or to a maximum time limit of 14 days, whichever is reached first.</p> <p>U. The operator shall conduct month-long surveys during the months of March and September by creating a log to record the name of the business and/or license plate of the vehicle of 3 party users. The log shall be available for review by the LEA.</p>
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		<p>2011 by 1:00 PM of each days processing activity and before “Inactive Storage”.</p> <p>CC. Staffing for processing of the food waste shall be maintained at the minimum level as described in Section 2 III, C2 of the amended RSI/TPR dated August 2011, and Operations Appendix F. Staffing levels may be revised as approved or directed by the LEA.</p> <p>DD. Food waste grinding shall be performed by a Morbark 2600 electric horizontal grinder, or equivalent processor approved in writing by the LEA.</p> <p>EE. Grinder equipment manufacturer’s recommendations for safe operation, cleaning, and maintenance shall be complied with at all times, and as described in Operations Appendix F of the amended RSI/TPR</p> <p>FF. Food waste processing operations assumptions, procedures, layout, equipment, and operations area cleaning shall be performed as described in Operations Appendix F, Sections 4 through 8, of the amended RSI/TPR.</p> <p>GG. Material for food waste operations shall be load checked to remove contamination from the waste stream.</p> <p>HH. During food waste operations, Operator shall monitor accumulation of MSW unloaded at the Public Unloading Area. MSW accumulation shall be cleared as soon as practicable to maximize safe and efficient vehicle circulation within the main transfer building.</p> <p>II. Operator shall implement the Contingency Plan for food waste operation as described in Section III C6 of the amended RSI/TPR and Operations Appendix F, Section 12. If so it shall be noted in the facility’s Daily Occurrence Log.</p>
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		<p>JJ. A written biological aerosol hazard assessment program shall be developed and provided to the LEA for review prior to acceptance of food waste for the food waste processing program. A written report documenting and summarizing the findings of this program shall be provided to the LEA on a monthly basis.</p> <p>KK. This Permit is subject to review by the LEA and may be suspended, revoked or modified at any time for sufficient cause.</p> <p>LL. This Permit supersedes the solid waste facility permit issued April 2, 2001.</p> <p>MM. No source separated commercial food waste pre or post shall be accepted on Saturdays or Sundays.</p> <p>NN. Food Waste shall be processed within 1 hour of receipt.</p> <p>The LEA, under this permit, will enforce those terms and conditions under the authority of the LEA within the Integrated Waste Management Act in the Public Resources Code and the California Code of Regulations Title 14 and Title 27.</p>
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Findings:

All of the submittals required by Title 27, Section 21685 have been provided. Staff has determined that the California Environmental Quality Act (CEQA) requirements have been met to support the project. The findings are summarized in table below. The documents on which staff's findings are based have been provided to the Branch Chief with this Staff Report and are permanently maintained in the facility files maintained by the Permits and Certification Division.

CCR Title 27 Sections	Findings	
21685(b)(1) LEA Certified Complete and Correct Report of Facility Information	The LEA provided the required certification in their letter dated October 12, 2011.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
21685(b)(2) LEA Five Year Permit Review	The LEA completed a Five Year Permit Review on January 10, 2011 and provided a copy to the	<input checked="" type="checkbox"/> Acceptable

CCR Title 27 Sections	Findings	
	Department on January 27, 2011.	<input type="checkbox"/> Unacceptable
21685(b)(3) Solid Waste Facilities Permit	The LEA submitted a proposed solid waste facilities permit on November 18, 2011.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
21685 (b)(4)(A) Consistency with Public Resources Code 50001	The LEA in their permit submittal package received on September 28, 2011, provided a finding that the facility is consistent with PRC 50001 and Waste Evaluation & Enforcement Branch (WEEB) in the Jurisdiction Product & Compliance Unit found the facility is identified in the Non-Disposal Facility Element (NDFE), and the facility is sufficiently identified in the NDFE as described in the memorandum dated September 30, 2011.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
21685(b)(8) Operations Consistent with State Minimum Standards	WEEB staff in the Inspections and Enforcement Agency Compliance Unit found that the facility was in compliance with all operating and design requirements during an inspection conducted on September 9, 2011.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
21685(b)(9) LEA CEQA Finding	The LEA provided a finding in their permit submittal package received on September 28, 2011 that the proposed permit is consistent with and supported by the existing CEQA documentation. See details below.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
21650(g)(5) Public Notice and or Meeting, Comments	A Public Informational Meeting was held by the LEA on July 13, 2011. No oral or written comments were received by the LEA or Department staff.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
CEQA Determination to Support Responsible Agency's Findings	The Department is a responsible agency under CEQA with respect to this project, a proposed revised Solid Waste Facilities Permit. Permits staff has determined that the CEQA record can be used to support the Branch Chief's action on the proposed revised permit. See details below.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable

Compliance History:

The facility was inspected by WEEB staff in the Inspections and Enforcement Agency Compliance Unit on September 9, 2011. No violations were noted.

Below are the details of the facilities compliance history based on the LEA's monthly inspection reports during the last five years.

- In 2011, one State Minimum Standard (SMS) violation for 14 CCR Section 17410.1, Solid Waste Removal was documented (January – September).
- In 2010, the LEA documented one SMS violation for 14 CCR Section 17409.5, Load Checking.
- No violations were noted in 2006 – 2009.

Environmental Analysis:

State law requires compliance with the California Environmental Quality Act through the preparation, circulation and adoption/certification of an environmental document and mitigation reporting or monitoring program or by determining that the proposal is categorically or statutorily exempt.

The Contra Costa Environmental Health Department, acting as Lead Agency, has prepared the following environmental documents for the Contra Costa Transfer and Recovery Station, SWIS No. 07-AA-0027, located in Martinez.

- A Mitigated Negative Declaration, State Clearinghouse No. 2010122061 was circulated for a thirty day comment period from December 20, 2010 to January 24, 2011. The MND was adopted by the Contra Costa Environmental Health Service Director on April 7, 2011. A Notice of Determination was filed with the State Clearinghouse on April 12, 2011.

The documents cited above support the addition of the commercial food waste collection and recovery project. The project consists of no more than 60 tons per day of source separated commercial food waste to be accepted at the facility. The trucks will unload the food waste on the concrete floor in a designated area within the enclosed transfer building. The waste will be fed into a grinder and the ground food waste will be transported to East Bay Municipal Utility District wastewater treatment plan for further processing.

The Local Enforcement Agency, the Contra Costa Environmental Health Department has provided a finding that the proposed Solid Waste Facilities Permit, and the RFI, are consistent with and supported by the environmental document cited above.

Staff recommends that the Department, acting as a Responsible Agency under CEQA, utilize the environmental document as prepared by the Lead Agency in that there are no grounds under CEQA for the Department to prepare a subsequent or supplemental environmental document or assume the role of Lead Agency for its consideration of the proposed SWFP. Department staff recommends the Mitigated Negative Declaration together with the CEQA finding, is adequate for the Branch Chief's environmental evaluation of the proposed project for those project activities which are within the Department's expertise and/or powers, or which are required to be carried out or approved by the Department.

Local Issues:

The California Environmental Quality Act record indicates no offsite cumulative environmental impacts. The project document availability, hearings, and associated meetings were extensively noticed consistent with the California Environmental Quality Act and Solid Waste Facilities Permit requirements. A review from the public process indicates that environmental justice issues were not identified by the surrounding community (Census Tract 3200.01). Census information indicates that the surrounding population is approximately 76.2% white, 1.8% black or African American, 1.7% American Indian & Alaska Native, 2.3% Asian, 0.2% Native Hawaiian & other Pacific Islander, and 11.2% "some other race" and 6.6% "two or more races". Approximately 24.2% of the total population described themselves as Hispanic or Latino. 8.1% of the families in the Census Tract were below the poverty level. Staff has not identified any environmental justice issues related to this item. Staff finds the project and permit process to be

consistent with Government Code Section 65040.12, as there has been fair treatment of people of all races, cultures, and incomes with respect to the proposed action being recommended above.

Public Comments:

On July 13, 2011, the LEA held a public informational meeting at the Contra Costa Hazardous Material Program in Martinez, California. The LEA did not receive any comments from the public information meeting or posted public notice. No oral or written public comments have been received by the Department or LEA staff. Another informational meeting was held in the same location on November 16, 2011. The results of this meeting are described below.

Department Staff Actions:

Staff commented on the proposed RFI and resolved the issues with the LEA.

Staff also reviewed, with the LEA, issues identified in the proposed permit. Staff identified several permit conditions in the originally submitted proposed permit that were not consistent with statutes and regulations as they are not within the permit authority of the LEA and, therefore, are unenforceable. One of them required the facility operator to pay a tonnage fee and other fees imposed under local ordinances. Other conditions required the operator to comply with the laws of other public agencies as to which the LEA has no authority.

The LEA had been informed in a letter dated June 29, 2011, that inclusion of a condition designed to collect an LEA fee would be found to be inconsistent with SMS and that staff would be required to recommend that CalRecycle object to the issuance of the permit. PRC § 44009(a)(2) specifies that if CalRecycle determines that a permit is not consistent with state minimum standards, CalRecycle shall object to the issuance of the permit. The enforcement agency's imposition of a condition that is not specific to design and operation, and environmental protection, is inconsistent with state minimum standards.

Staff continued to work with the LEA staff person, Mr. Eric Fung, to address some of the outstanding issues and obtain further clarifications of the proposed permit package. On August 2, 2011, staff spoke with Mr. Eric Fung by phone and by email on October 12, 2011, that several of the permit conditions were outside of the LEA's authority. Staff explained to Mr. Fung that the permit needs to include only conditions that are for the protection of public health, safety, and the environment, and for the design and operation of the facility within the LEA's authority and responsibility. Staff also stated that the conditions in the proposed permit must not overlap with the requirements of other regulatory agencies.

In order to facilitate understanding of this issue between all parties concerned, and to provide this information to any interested members of the public, an information meeting was held in Contra Costa County on November 16, 2011. In addition to the operator, LEA, and CalRecycle, attendees included representatives of the East Bay Municipal Utilities District and the Contra Costa County Solid Waste Authority. Department staff gave presentations describing the project. As a result of the meeting, the LEA agreed to remove the unacceptable conditions and to submit a new version of proposed revised solid waste facility permit, which was received on November 18, 2011.

In addition to the above, the Department provided an opportunity for public comment during its monthly Public Meetings held on October 18, 2011, and November 15, 2011.