



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

JAMES F. STAHL
Chief Engineer and General Manager

September 21, 2006

File No.: 31R-10.11

Ms. Bobbie Garcia
California Integrated Waste Management Board
P.O. Box 4025
Sacramento, CA 95812-4025

Dear Garcia:

Comments on Permit Implementation Regulations

Thank you for the opportunity to comment on the proposed permit implementation regulations, which are intended to implement the statute chaptered by Assembly Bill 1497 (AB 1497). As a public agency serving over 5 million people in Los Angeles County and dedicated to environmentally and economically sound integrated management of municipal solid waste, we fully appreciate California Integrated Waste Management Board's (CIWMB's) efforts to solicit stakeholder input through these comment periods to develop regulatory language that is consistent with the directives of AB 1497.

We appreciate the latest proposed regulatory language which gives discretionary authority to enforcement agencies (EAs) for determining what constitutes a minor change beyond those listed in Section 21620(a)(1)(E). We believe that the operator should be able to implement insignificant changes as minor changes so long as they are consistent with the State minimum standards, the existing solid waste facility permit, and the Report of Facility Information (RFI).

However, when determining consistency with the RFI, the EA should only look at the required elements of the RFI as stipulated in Section 21600 of the Public Resources Code. Often times, the operator voluntarily includes additional information in the RFI beyond what is required to make the document more descriptive of the facility. The latest version of Section 21620(a)(1)(D) deletes the reference to Section 21600 of the Public Resources Code. This would unintentionally encourage operators to only include information that is minimally required in Section 21600 of the Public Resources Code. We would therefore request that Section 21620(a)(1)(D) be amended to read:

"(D) the change does not conflict with the design and operation of the facility as ~~provided~~ described in the current RFI ~~and pursuant to Section 21600.~~"

Thank you for your consideration of our comments. Please feel free to call me at (562) 908-4288, extension 2761, should you have any questions.

Very truly yours,

James F. Stahl

Charles Boehmke
Section Head
Planning Section

CB:GA:ld

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