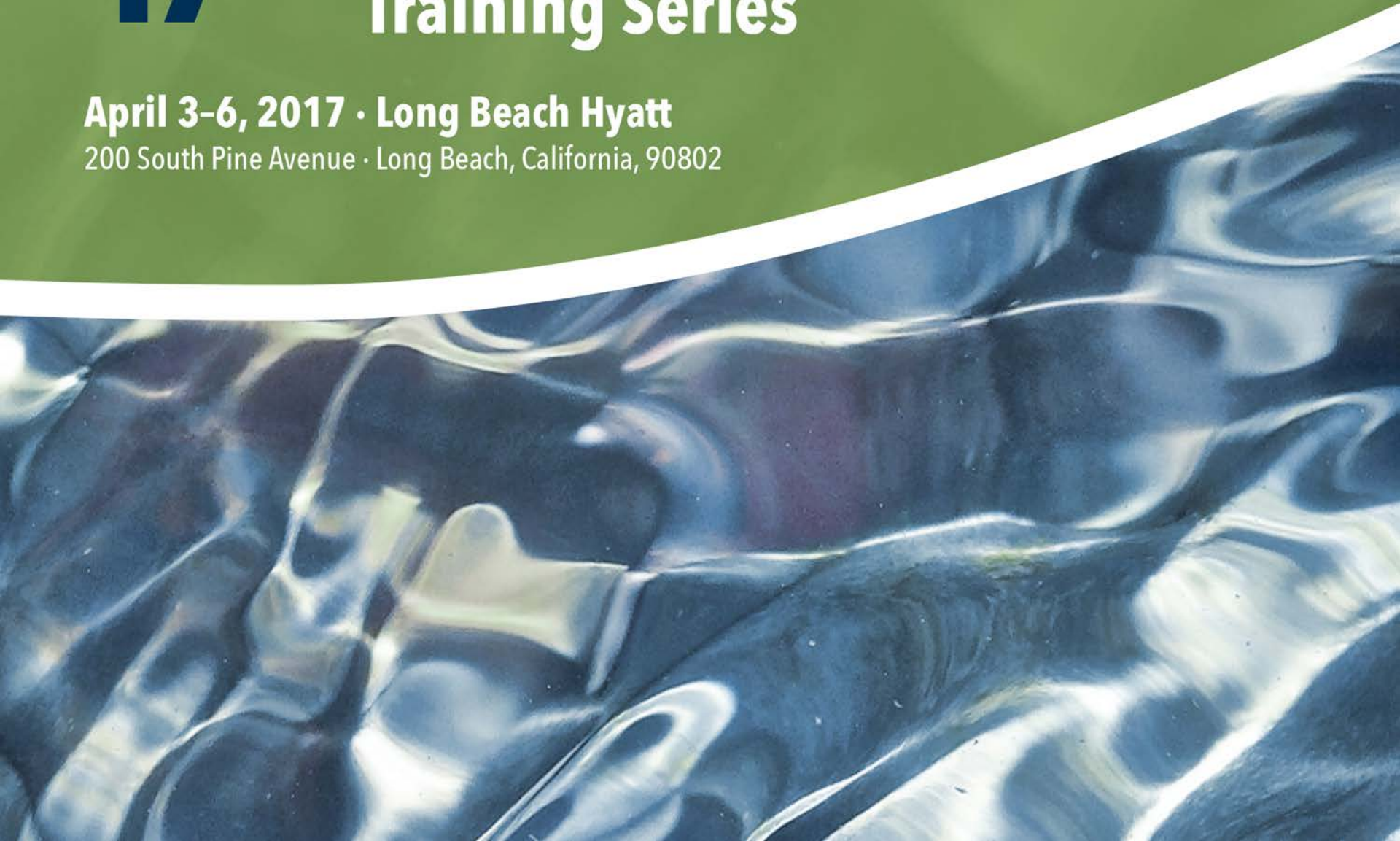


# 17<sup>th</sup> Technical Training Series

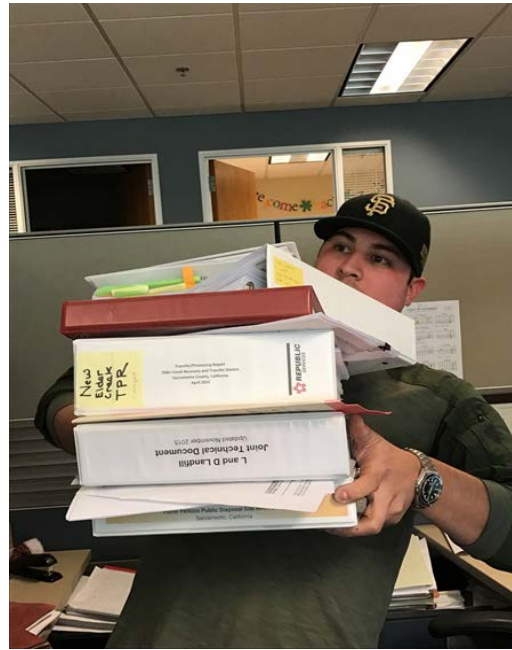


**April 3-6, 2017 · Long Beach Hyatt**  
200 South Pine Avenue · Long Beach, California, 90802





# A Quick Guide to Reviewing Operating Documents



Presented by:  
John Lewis  
Sacramento County LEA

# GOALS AND OBJECTIVES

## Understanding:

- **What is a RFI**
- **Types of RFIs**
- **Purpose and content**
- **When to review them**
- **LEA requirements**
- **Review Tips**

# The Report of Facility Information is:

- An **operations and design plan** that describes the facility
- Says who the **owner** and **operator** are
- Tells how the facility will comply with **State Minimum Standards (SMS)**
- Must be kept **current**
- Must be **accurate**

# Types of RFIs:

**Landfills:** Report of Disposal Site Information (**RDSI**) Also: Joint Technical Report (**JTD**)

**Transfer Stations:** Transfer Processing Reports (**TPR**)

**Compost Facilities:** Report of Compost Site Information (**RCSI**)



# LANDFILLS

(See 27CCR, section 21600)

## RDSI includes:

- Facility overview
- Site plan
- Waste types
- Volumetric capacity
- Site life estimate
- LFG management plan
- Cover materials

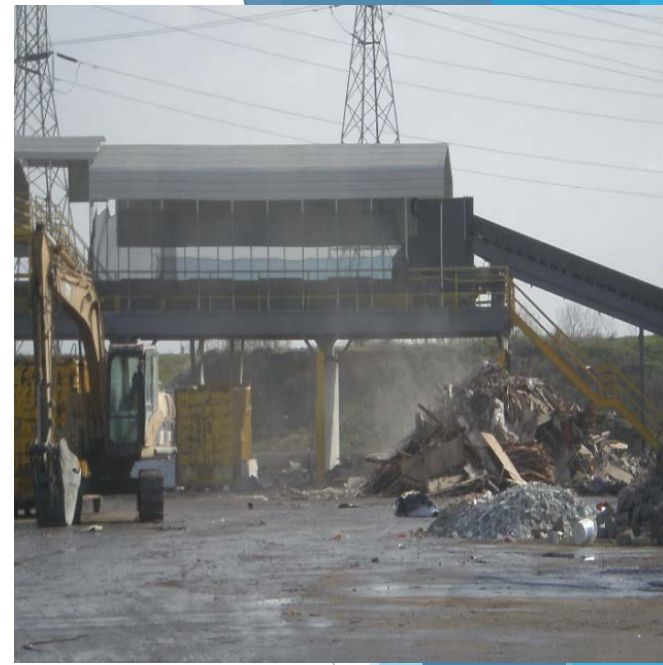


**Joint Technical Document:** JTD combines CIWMB and RWQCB requirements (technically it includes all post-CUP permitting agency requirements)

# TRANSFER STATIONS

## TPR includes:

- Site map and site location map
- Adjacent land uses w/in 1000'
- Facility design capacity
- Types and quantities of solid waste
- Provisions to handle unusual peak loading
- Planned method for final disposal of the solid waste



(See 14CCR section 18221.6)

# COMPOST FACILITIES

## RCSI includes:

- Processes/quantities of feedstocks, additives, and amendments to be use
- Operations to be conducted.
- Methods to control leachate, litter, odors, dust, rodents, and insects
- Storage capacity
- Maximum and average length of time compostable materials will be stored at the facility.
- An Odor Impact Minimization Plan per 17863.4.



(See 14CCR section 18227)



# OPERATOR SUBMITS RFI

- 180 days before proposed changes
- As part of permit application package
- As part of 5 Year Permit Review
- To revise outdated or inaccurate information
- As directed by the LEA

**Question: Transfer Station operator wants to install a second sort line. Is that an RFI Amendment?**



# CHANGE OF OWNER/OPERATOR

**21630 requires owners/operators who plan to sell, or convey ownership or operation of the facility or land to a new owner or operator or who plan to change the address, shall notify the LEA and CalRecycle 45 days prior to the anticipated transfer.**

## THE NEW OWNER/OPERATOR MUST PROVIDE:

- Documentation re: Financial Assurance/Operating Liability
- Signed affidavit certifying that he/she has read the SWFP and conditioning documents and will operate in accordance with them
- RFI Amendment application to reflect changes in owner, operator, address, etc.

# LEA PROCESSING REQUIREMENTS:

- Stamp with date of receipt
- Review and accept or reject within 30 days
- Notify operator, CalRecycle, and RWQCB (if applicable) within 5 days
- **For CalRecycle:** include LEA determination, copy of RFI amendments, and copy of application
- If **rejected**, notify operator of the right to appeal the decision within 30 days



11  
(See 27CCR, Section 21666)

# THE COMPLETE AND CORRECT RFI:

**Complete** means all requirements placed upon the operation of the facility by statute, regulation, and other agencies with jurisdiction have been addressed

**Correct** means all information provided by the applicant regarding the facility must be accurate, exact, and must fully describe the parameters of the facility

# DOES IT QUALIFY AS AN RFI AMENDMENT?

## Changes that are never RFI amendments:

- Increase in permitted tonnage
- Increase in facility's acreage
- Increase in permitted hours of operation
- (For landfills) Increase in permitted disposal footprint and/or permitted final grade



# THE 3 FINDINGS:

The LEA may approve proposed changes as an RFI amendment if:

- (1)** The proposed changes are consistent with all applicable certified and/or adopted **CEQA** documents;
- (2)** Are consistent with **SMSs**, and;
- (3)** Do not conflict with the terms and conditions in the current **Solid Waste Facility Permit**.

**(See 27 CCR, section 21665(c))**

# THE RFI MUST BE ACCURATE

**Example:** TPR states: The site is a large, flat parcel that is mostly paved but site visit reveals that more than 50% of site is unpaved and the paved portion is in poor condition



**In practical terms, why might this be a problem?**

# POSTING THE NOTICE

Within 5 days of approval:

- Operator prepares Notice to post at facility entrance for 10 days
- LEA also posts notice on LEA's public Board, or LEA's website, operator's website, or CalRecycle's website.



# RFI REVIEW TIPS

# Resources

Visit CalRecycle's **Permit Toolbox / Report of Facility Information** page at:

<http://www.calrecycle.ca.gov/SWFacilities/Permitting/checkitems/rfi/>

Use RFI Checklists and avail yourself of other resources provided



# PREPARE

## Review key regulations like:

- **Required contents:**
  - Section 21600 for RDSI (Landfill) contents
  - Section 18221.6 for TPR (transfer station) contents
  - Section 18227 for RCSI (compost) contents
- **LEA Processing Requirements 21650**
- **Processing Proposed Changes 21665**
- **Processing RFI Amendments 21666**
- **Minor Changes 21620(a)(1)**
- **Significant Change defined 21563(d)(6)**

# Familiarize yourself with the facility's

- Solid Waste Permit
- CEQA documents
- Applicable SMSs

Refer to them during the review to assist you in making the **3 Findings**

# Pre-Submittal

- Discuss intent of RFI with operator
- Consider offering to review draft language
- Provide feedback prior to submittal
- Ask operator to submit RFI with ALL changes in track-change format
- Keep lines of communication open

# Know the Facility!

- **Consider site visit**
- **Does RFI make sense?**

## Also:

- **Are terms used consistently?**
- **Do all sections of the document agree?**
- **Don't be afraid to ask questions**

# Questions:

- **The operator of a transfer station wishes to expand the operations at his 10 acre facility to include an additional 1.5 acre area. Can this be approved as an RFI amendment?**
- **The operator of a compost facility reviews his RCSI and sees that the list of person(s) responsible for oversight of facility operations is out of date and wishes to revise it. Can this be approved as an RFI amendment?**
- **The operator of a landfill wishes to increase the final height of her landfill while remaining within the existing permitted disposal footprint. Can this be approved as an RFI amendment?**
- **The operator of a chip and grind under EA Notification wishes to update outdated information in his RFI. Can this be approved as an RFI amendment?**



# Summary:

- ▶ Review and accept or reject within **30 days**
- ▶ Notify operator, CalRecycle, and RWQCB (if applicable) within **5 days**
- ▶ If rejected, the operator may **file an appeal** to the Hearing Panel within 30 days
- ▶ Operator **Post Notice** within for at least **10 days**
- ▶ LEA posts notice on **website** or other venues per section 21660.1

# QUESTIONS?