

500-5468

Lorentzen, Wayne@DTSC

From: Marisa Alexander <malexander@crpe-ej.org>
Sent: Friday, October 25, 2013 4:15 PM
To: Lorentzen, Wayne@DTSC
Cc: ibrostrom@crpe-ej.org
Subject: Public Comment on Kettleman City dump expansion
Attachments: Petition to stop Kettleman Hills expansion.xls

Wayne,

Attached is a list of people who signed our online petition opposing the expansion of the Chem Waste Kettleman Hills hazardous waste dump, with additional comments. We are submitting this as part of the public comment period for the permit. The petition was prefaced with a video and this language:

“Kettleman City is a rural, majority Latino and farmworker community halfway between Los Angeles and San Francisco. It is home to the largest hazardous waste dump this side of the Mississippi and to shockingly high rates of childhood cancer, birth defects and miscarriages - two facts residents believe to be connected. Now the dump is looking to double in size and the agency responsible for approving the expansion - the Department of Toxic Substances Control - is letting it happen. We have until October 25th to stop this. Sign the petition to demand the Dept. of Toxic Substances Control stop the dump from expanding!”

The petition was housed here: <http://www.mycuentame.org/toxicwasteland>

If you need additional information please let me know.

Thank you,

Marissa Alexander
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Comment Number	Name	Comment
500	Juan Carlos Hernandez	
501	Amber Thomposn	That's tantamount to Premeditated Murder.
502	Marissa Alexander	
503	Lo Auer	
504	Eddie Gallagher	
505	Gina V	
506	Mary Lind	
507	timothy tascione	
508	Axel Caballero	
509	Humberto Orozco	
510	John Manier	
511	Claudia Navarrete	
512	Chaitanya Diwadkar	
513	mario saenz	
514	Marissa Moreno	
515	justin weymouth	
516	Carri Lacy	
517	Judith Kwoba	
518	raymond arancon	
519	Penelope Bradley	Why not put these dumps in rich people's back yards?
520	Jasmine Hernandez	
521	Joanna Garcia	
522	Siusaidh Chaimbeul	
523	Katherine Schock	This is unconscionable...all people have a natural human right to live in a clean environment! This must be stopped!
524	Philip Winkels	
525	Roberto Carneiro	
526	Andrea Gray	
527	Ingrid Brostrom	
528	Nicole Walker	
529	sharon procter	
530	Kassie Siegel	
531	Elizabeth Solorio	
532	Charise Adams	
533	Heather Ramirez	
534	storm eden	let them put waste in their own back yard
535	o m	
536	Pedro Botello	
537	Roger Adams	
538	maria marquez	
539	April Robbins	
540	Manuel Vargas	
541	Adrian Aponte	
542	Arthur Field	
543	Laurie Martinez	
544	Penelope Tafoya	Don't make poor people bear the burden of the waste for which we are all responsible.
545	Naeem Vahed	
546	Liana Rundle	
547	Joe Omalley	I hear that's the elites plan, they don't give a damn!
548	Gustavo Caldas	
549	Christina Bulman	
550	Tom Emdy	
551	Sarah Aird	
552	Ashley Williams	With LOVE!
553	Robin Clapworthy	
554	Joy Simpson	
555	Smokey Hormel	
556	Janette Docherty	Must be stopped
557	Linda Patmore	Stop this right now. Always people before profits.
558	Corrine Edwards	
559	Terras Bruce	
560	Mabel HUNTER	stop this now
561	gary jackson	
562	Nikola Bulatovic	
563	mfchael sorano jr.	enough enough enought
564	Tom Langton-Lockton	
565	Diana Kirkpatrick	
566	john reid	
567	Karin Curtis	
568	laura weldon	

Comment Number	Name	Comment
		Good luck!! All power to the people!!!
		Much love
569	Angela Verley	xxxxxxxx
570	david thornton	It's a pity in this day and age what with technology and all that,that they cant convert the waste....
571	Elisabeth Jenders	Mother Earth and her Children are our future, not your profits!
572	Katherine Silberman	
573	glen turner	
574	Roxanne Banuelos	
575	Brenda lira-lopez	STOP!! THE KILLING OF INOCENT BABIES!
576	Leslie Gold	
577	ingrid Gutierrez	
578	John David	
579	Kari Grace	
580	steve smith	
581	Cynthia Perez	
582	Bonizu Ramirez	
583	Eloisa Valenzuela	
584	Maya Valverde	This is criminal. As usual politicians and big business team up for profit and health concerns are secondary. Stop killing our babies!
585	Javier Garcia	
586	Wilson Livichuzhca	
587	Jessica Bravo	
588	Kelleen Farrell	
589	Marcus Baca	
590	Myrna Flores	
591	Donald Donaire	
592	Eric Robichaud	
593	Matt Gordon	
594	Gail Breakey	
595	Seth Snapp	
596	Alan McLemore	
597	james peebles	
598	frank christian	
599	Richard D'Arcangelo	
600	Zachary Eagle	
601	Wonono Rubio	
602	Todd Snyder	
603	Robert Biro	
604	Lainie Covington	
605	nathan vogel	
606	Allen Terrill	
607	Richard Hirsch	
608	Rachel Kaplan	
609	Ben Ruwe	This, like all evils, is likely the product of republicanism.
610	Michael Markic	
611	Phil To	
612	Gura Lashlee	
613	Sharon Callahan	
614	Eric Decker	
615	Kyle Peterson	
616	Bryn Fillers	
617	Robyn Bates	
618	Ron Pagano	
619	Charleen Steeves	
620	Tim Tarleton	
621	Brad Jones	
622	V. Alexander	
623	Larry Rosenberg	
624	Ken Windrum	
625	Dorothy Brown	
626	Stephen Mudrick	
627	Jorge Garriga	
628	Alice Kelly	
629	Ruth Stambaugh	
630	Rochelle Willis	
631	Shane Suydam	
632	susan sammis	
633	Doyle Jones	
634	David Shroder	
635	Charlie Ahlquist	
636	Mark Reback	
637	Janis Sawyer	

Comment Number	Name	Comment
638	phillip markis	
639	Giovanni Garcia	
640	Jamie Lee Brennan	
641	Victoria Miller	
642	Beth Bridges	
643	Gary Usinger	
644	Mitch Dalltion	
645	Michael Kemper	
646	Patrick Russell	
647	Sigmund Finman	You inherit the suffering that your actions cause. It's your inevitable karma.
648	Karen Thomas	
649	Hillary G. Buckingham	
650	Robert Thomas	
651	chrissey hoffman	
652	Ethan Contini-Field	
653	Timothy Mullen	
654	thomas clark	
655	adrienne williams	
656	Stephen Parish	
657	Charles Davis	
658	Guayi Fernandez	
659	scott lang	
660	Virginia Woolridge	
661	Robin Schnell	
662	Sarah McLean	
663	Colin Evans	
664	pat turney	
665	Brian Todd	
666	Robert Reed	
667	Carole Henry, MSW	We have to stop making toxic waste. There is nowhere safe to store it.
668	sarah hafer	
669	Vivian Penniman	
670	margaret tatum	
671	pat larson	
672	Patsy Shafchuk	We all will be held accountable.
673	m. robinson	
674	John Simons	
675	David Marcus	
676	Sandra Mattson	
677	Jc Honeycutt	
678	David M Goldberg	GET LAWYERS!
679	John Wise	
680	Rachel Wolf	
681	nancy pearson	
682	Lorna Holmes	Everyone has a right to clean air, clean water, and to not having their children poisoned in the name of corporate profits.
683	Tony L	
684	glenn churchill	
685	jose galdo	
686	douglas clough	
687	Sara Avery	
688	Sidnie Zari	
689	Jessica Cresseveur	
690	patricia stewart	
691	Shirley Rodriguez	
692	Michelle palladine	
693	L.R. Balkin	
694	Janine Moore	
695	Arita Nicholas	
696	Barbara Dahms	This is totally unconscionable. The farm worker community is exposed to too many toxins in their work. To bring the waste home to their living space is incredible and totally unacceptable. Stop, AND CLEAN UP the dump.
697	Robert Duffy	
698	Jo McCord	
699	cheryl engel	
700	Rupa Shah	
701	Julis Hathaway	
702	Johnny Powderly	
703	Javier Perez	i hope you and your families suffer the side effects if your poisons!!! Fuck you and I hope you die soon!!!!
704	sondra hardgrave	
705	John Cassel	

Comment Number	Name	Comment
706	Michele Langston	
707	David White	
708	Earl White	
709	M Menendez	
710	Kevin Vaught	
711	Dennis Krupinski	
712	Paul Jefferson Paul Jefferson	
713	Philip Mayer	
714	Susan Cadman	Corporations need to pay for cleanup, not just dumping. They make the profit, they need to do a serious job of cleaning up. Otherwise this and all related problems become the taxpayers' problem. No only should this dump not expand, there should be serious effort made in cleaning it up. Eventually these things seep into our groundwater.
715	Robert Blumenthal	
716	Carl Jerry Vasconcellos	
717	Kenneth and Penny Bruce	
718	Nathan Smith	
719	Robert Wilkerson	
720	Marilyn Taylor	
721	Robert John Bennett	
722	Valente Torrez	
723	Larry Razzano	This is very shocking and alarming. Something must be done immediately.
724	Lawrence Boch	
725	norm kolody	
726	John Markovic	
727	Janis Scharf	
728	James Buckles	
729	Will Beuscher	
730	Christine Klunder	
731	Joel Carlson	Republicans not only have a vicious war against women, they also have a war against the environment, immigrants, minorities, seniors, young people, gays, the middle class, poor people and health care. Their only real constituents are the super rich oligarchs who hide money offshore, cheat on their taxes, buy off corrupt Republican politicians and do not create jobs. Republicans have a culture of corruption that will greatly harm our country. Their tactics of fear, hate, religious bigotry are clearly not the American way yet they have fooled some of the most ignorant and bigoted Americans into supporting them. We must be absolutely sure they are soundly defeated in upcoming elections!•ÈÀ
732	Charles Dickey	
733	Mike Kappus	
734	Paula Lepore	
735	Ariana Newcomer	
736	Carol Rahbari	o.k, someone needs to get to work finding another solution to the toxic waste problem and stop dumping in our communities. you smart guys out there! get busy!!
737	George Hickey	
738	Linda Willus	Enough is enough - these cancer causing substances can be stopped. They are man made.
739	Devin Henry	
740	Brad Walrod	
741	Jacob Haniff	
742	Dillon Wu	
743	Bruce Scotton	The toxicity from the dump is already past safe levels. NO MORE!!!
744	Margaret Bergwall	
745	Dennis Reid	
746	Mary Horowitz	
747	Liz Galst	
748	Michael Marcus	
749	R. Marti	
750	Jack Lohman	
751	Catherine Sparer-Morales	
752	Timothy Gunter	
753	Ingrid Ronngren Guerci	
754		
755	William and Norma Blair	Corporate greed has many faces. Criminal behavior should not be one of them. Stop poisoning people!
756	Javier Torres	
757	judy aulette	
758	Jim Gay	
759	Greg Puppione	
760	Catherine Curtis	
761	Margaret Silvers	
762	john canepa	Here in the 21st century this is intolerable and despicable. There is the tools and knowledge to prevent this from happening and there are no excuses.
763	Dave Lippman	

Comment Number	Name	Comment
764	Virginia Franco	Reprehensible(!); especially in this era of deliberate, really, systemic reduction of environmental regulations
765	Bruce Berger	
766	Haydn Huntley	
767	Robin Dunn	
768	Elaine Tirrell	
769	John Kysela	
770	Bob Douglas	Do unto those downstream as you would have those upstream do unto you.-Wendell Berry
771	Ray Harris	Wha tyou have done to the least of these, you have done to me.
772	James Talbot	-Jesus
773	Victor Sansalone	wrong wrong wrong
774	Margarita Perez	
775	Philip Gasper	
776	Rhod Zimmerman	
777	Mike McLoone	
778	Bonnie Sonder	
779	Patty Bowers	
780	Kristen Eichleay	
781	Tim Callahan	We all need to share the burden of our hazardous waste. Perhaps we need to require that our waste must be disposed of locally.
782	Geraldine May	
783	Jacoba Dolloff	
784	Robert Biccum	
785	Chris Oconnell	
786	Jose Trevino	
787	Janice Bollman	
788	Mary Haas	
789	James Wray	
790	Wayne Straight	
791	Brigid Clarke	
792	John Kaufmann	
793	Dwight Arnold	
794	Valarie Stengle	
795	Sheila Kinkead	
796	Mattie Bosch	
797	Patricia R	
798	James Fournier	There has to be a better way...
799	Thad Danielson	
800	Hans Krause	
801	Clayton Jones	
802	Laura Ackerman	
803	D Carr	
804	Kent O'Quinn	
805	Richard Paul Glass	
806	Alex Oshiro	
807	Ronald Richardson	
808	Judith Sandeen	
809	Donna Bonner	
810	John A. Samuelson	
811	Vincent Hvizda	
812	Susan Hathaway	
813	Liliana Pena	
814	Jeff Topping	
815	Christina Babst	
816	Beatriz Sosa	
817	Kathe Garbrick	
818	Michael Anderson	
819	Julie Bernardin	
820	Linda Gertig	
821	Kevin Probasco	
822	Bridgette Greene	
823	David Berkshire	
824	Judith Bohler	This is horrendous.
825	Sandra Huerta	
826		
827	Joan Black	
828	Janet Noonan	
829	Colin Jones	
830	James Nawara	
831	Barbara Schoeberl	
832	Janice Hallman	

Comment Number	Name	Comment
833	Kerby Miller	
834	Patricia Goldsmith	This dump is outrageous!
835	Dorothy Van Soest	
836	Jeff Weicher	
837	rebecca cohen	
838	David J Parker	This is happening in so many places, come to northern Alberta and talk to the Cree people of Fort Chipewyan
839	William Huntley	It's a problem of capitalism resulting in so many other problems like environment, societal, even fiscal in the long term.
840	jeff mcdermott	
841	Alan Hansen	
842	Barry Swedlow	
843	Mary Hsia-Coron	
844	Lisa Moore	
845	Aggie Rose-Chavez	
846		
847	Fran Grabenhofer	
848	Roger P Kovach	
849	Doran Larson	
850	Warren Booth	
851	Clay Adams	
852	Mark Lewellen-Biddle	
853	Charles Price	
854	Pamela Reichmann	
855	Joseph Kohn MD	www.WeAreOne.cc and we are watching.
856	Ken King	
857	Eva Walters	
858	Leland Chambers	
859	Steve Schueth	
860	Sophe Stine	
861	anthony haas	clean this place up, make the people that put it there, to take it, to their homes. see how they like it, fine the shit out of them too! or send them all to prison.
862	Charles Phillips	
863	Daniel Belachew	
864	Judith Duval	Aren't state agencies created to prevent danger to its citizens? Where are the inspectors, lawyers, elected officials who are responsible for protecting the citizens?
865	Diane Puckett	
866	David Kreiss-Tomkins	
867	Rebecca Mobley	
868	Marvin Douglas	
869	Gregory David	
870	Doug West	
871	Luis Heras	Enough already! This has to Stop Now!
872	Bob Panzer	
873	Laurel Bemis	An independent agency needs to check water from local wells as well as air quality.
874	Alan Arnold	
875	John Lopez	
876	Otto Olivera	
877	Kim Hansen	
878	Steve Wanninger	
879	Ashton Crosby	
880	Catherine Brennan	
881	maria payan	
882	Fabien Cardoso	
883	Charles Luce	
884	Cheryl Fontaine	
885	Jessica Lederman	
886	Patricia Szot	
887	Michael Dohn	
888	Randy Harrison	
889	Denise Laffer	
890	Erica Potrzeba	
891	Daniel McLaughlin	
892	Arthur Paz	
893	Brent Rocks	
894	Hector R. Amaro	
895	Jo Walters	
896	renee klein	
897	Linda Roady	
898	Muhammad Islam	
899	Charles Graham	
900	Elizabeth Peralta	

Comment Number	Name	Comment
901	Jennifer Smith	
902	Mike Sales	The protection of these killers by the government is a disgrace. The people need protection NOT the corporations. But it is always about money and the corporation has LOTS of it.
903	Ruby Grad	
904	nancy-alyce abbott	
905	Marya Small	
906	Connie Lemke	
907	Janet Maker	
908	Gordon Barr	
909	Alex Cernik	
910	lynn manziona	OMG--children are dying--do not let them kill more children!!!!
911	Arnold Haber	
912	Lorna Paisley	I hope someone is educating the people on the dangers of toxic chemicals and making them aware of the fact that no government agency is set up to protect them.
913	Stuart Newberg	
914	Juliane Burbach	Disgusting!
915	John Kafkaloff	
916	Dela Soumitte	
917	Peter Yeager	
918	George Nava	Posted to facebook
919	Bruce Burger	
920	Jeri Renner	Preserve the earth. Stop destroying it. Remember life is sacred.
921	William Daghlian	
922	Jean Sheldon	
923	Norma Colon	
924	Maki Murakami	
925	Manu Martin	There is a current lawsuit with PG & E and movie 'Erin Brockovich (film)' about the Toxic Chromium - 6 Trivalent? Get ahold of the same lawyers who are fighting in court for those who been exposed to the Cr6. Manu
926	liz wilton	
927	Greg DeMasi	
928	Adrianna Delgado	
929	Elizabeth Seltzer	
930	Lee Kefauver	
931	Jeffrey Bains	
932	Tom Bartley	
933	David Jones	
934		STOP IT NOW!
935	susan marchand	
936	Mike Benson	
937	Annette Way	
938	Pamela Kenny	
939	Lynne Hancock	
940	Tara Prairie	
941	LaVerne Landauer	Is anyone testing the air or groundwater for pollution? What is the cause? Why is nothing being done?
942	Mary Derengowski	
943	Andrea Yarger	
944	Barbara Perea	
945	Ronda Schuman	
946	Don Grierson	
947		
948	David Collins	
949	Aline Barnett	
950	Gil Field	
951	Eric Jensen	
952	Meaghan Simpson	STOP COMMITTING CRIMES AGAINST HUMANITY AND ALL LIVING THINGS NOW!!! WE WANT SUPER HEALTHY LIVING FOR ALL!!!
953	George Abaunza	
954	Sally Hill	
955	Rich Beadle	
956	Robert Kuhn	America has turned its back on its own people. Mitt Romney's show horse is better taken care of than the average American.
957	Peter Economou	We are simply on our own in this country, and this will get much worse.
958	Albertina Padilla	This sounds more like Texas than California! This is what deregulation really means. Not holding corporate polluters accountable.
		And children die. And America simply does not care.

Comment Number	Name	Comment
959	Darryl Dobson	It's time to stop putting profits in front of human lives.
960	Vincent Johnson	the CEO was on the tv show undercover boss. he portrayed herself as a loving purpose. lets see if it is true or it was just a TV show
961	Nancy Boyce	
962	Rod Zwirner	Externalizing costs for more profit(socialism for the rich)has to stop.
963	Therese Ryan	
964	Craig Wood	
965	John Hatton	
966	James Haig	
967	James Smith	
968	Patrice Summers	
969	Michael Tomczyszyn	
970	Robert Mitchell	
971	sally davis	
972	James Roper	You pay "business ethicists" to sanitize your corporate acts and spew about "corporate responsibility," then you do this: what a joke!!
973	ricki wilson	
974	Jean Teach	
975	Brenda Pomerance	
976	Norman Thornton	
977	Bob Stevenson	
978	claudia mcnulty	
979	Patricia Smith	
980	Brian Baltin	
981	Susan Shaak	
982	Sandy Williams	
983	David Hosea	
984	Jim Drevescraft	
985	Eric Haskins	
986	Darlene Lovell	
987	Barbara Hughes	
988	David Gurarie	Stop toxic dumping, punish dirty businesses
989	Jessica Hamilton	
990	Greg Sutherland	
991	Michelle Hamilton	
992	Robert Deck	
993	Elizabeth Sherwood	Both the contents and this hazardous site itself should not even exist in its present location, and it must not ever be allowed to expand! Shame is upon all who allow it and want to expand it!
994	Norma Corey	
995	Karen Poels	
996	Richard Entenman	
997	Jesse Overton	
998	Frances Goff	
999	Bruce Eggum	Stop dumping Toxics all over US
1000	Naomi Menkin	
1001	Gail Rector	
1002	Mark W. Mehl	
1003	William King	
1004	Carolyn Wright	As I always say, profits before life. Is there no conscience left in American business? Guess it doesn't really matter to you whether a segment of the population is killed by this toxic waste.
1005	Leonard Conly	
1006	Donald Jones	
1007	Paul Jalbert	
1008	Earl Fenner	
1009	Susan Sher	
1010	Cameron Estes	The government killing our citizens, deforming babies and general chaos creation are no longer mentally ill activities but rather the new normal.
1011	Sybil Malinowski Melody	Toxic waste is just that, it's toxic, which is why we should protect people and the environment from it.
1012	Peter Spitzform	
1013	Judith Myers Avis	
1014	Peter Roche	
1015	Jay Atkinson	
1016	norman cressy	
1017	Diane Bowen	This is to say nothing of all the toxic waste used in fracking and chemtrails.
1018	John Exdell	
1019	Cristy Murray	
1020	Deborah Voves	
1021	Mercedes Brugh	Not expanding the landfill is only the first step. The Department of Toxic Substances Control should live up to their name and actually control toxic substances.
1022	emerald jones	
1023	Joseph Alfano	
1024	susan kerwin	

Comment Number	Name	Comment
1025	Gene Sidore	
1026	Trudie Barreras	This is one of those issues that may not matter to the "mainstream" now, but we had all better take notice. Kettleman City today, our own home towns tomorrow!
1027	Aaron Ucko	
1028	Michael Franck	
1029	william shottenkirk	There's a reason they put this where it is. The same reason they want to expand there.
1030	Kristin Schaem	
1031	george russell	This has been going on for 25 years maybe a petition is going to be inadequate
1032	Jeff Harris	
1033	Russell Lukes	
1034	e perkins	
1035	Trish Ellis	
1036	Robert Bruckman	
1037	Peter Giannini	
1038	Patricia Michaels	
1039	Steve Garcia	
1040	Kerry Berger	
1041	Bianca Anderson	
1042	Christopher Cornog	
1043	Oracio Casillas	
1044	eugenio fischer slÁnchez	
1045	Barrie Gile	
1046	david shatkin	
1047	wayne askew	
1048	Don Cadora	
1049	sharon anhorn	
1050	Brian Kay	
1051	Lisa Simeone	Quit dumping sh*t on poor people!
1052	eric moore	
1053	Nancy Bruny	This is completely unreal and outrages for people to live under these conditions because of greed or what ever you want to call it.
1054	Douglas Schoenberg	
1055	Theodore Wirth	Even though there's a fat chance our languishing government will lift a finger to impede the profits of polluters, unless willful pollution took place in the Hamptons or the back yard of some oligarch. Nevertheless, I register my official complaint.
1056	Marc Garber	
1057	Sarah Mathews	
1058	James Clark	
1059	Brandon Rosin	
1060	Tim Boelke	
1061	Beverly Jones	
1062	Eric West	It's time to actually think about ways to avoid having any toxic waste as a by-product of manufacturing or any other business. Find ways to re-use the waste in an environmentally sound way.
1063	Bonnie Venters	
1064	Sara Hale	
1065	John Kirk	
1066	Claude Robert	
1067	Glenn Krakower	
1068	Gloria Hatrick	
1069	Mack Freestone	
1070	Lorenz Steiningner	
1071	Jaine Kelsberg	
1072	Frances Sears	
1073	Margarita Gamero	We need farms not waste.
1074	Natalie A. Carter	
1075	Dan Burton	
1076	David Schogel	
1077	Dudley and Candace Campbell	
1078	Jeff Kiralis	
1079	Betty Louise McLane-Iles, Dr.	
1080	Grace Lee-Park	
1081	James Nowack	
1082	Tifni T Lynch	
1083	David Butler	
1084	Robert McKinnon Jr.	
1085	Greg Sells	
1086	Gerald Moss	
1087	Bonnie Reukauf	
1088	claudia lopez	
1089	Jamie Bartlett	

Comment Number	Name	Comment	
1090	Susan Puscheck	This dump is already a toxic wasteland with childhood cancer, birth defects, and miscarriages as a result. How could this dump be allowed to expand, unless someone is extremely negligent or a payoff is involved?	
1091	Barry Deist		
1092	Tracy S Troth		
1093	Wilson Chin		
1094	Stanley & Bluma Kaplan		
1095	Bobbie Raymond	This is totally unfair to the inhabitants of this town, and especially the attempt to cover up plans to enlarge the facility. Why can't a company work with a community instead of destroying it and telling lies to cover up what they're doing? Saving money in the short term for a company does not make for a wise economy.	
1096	Brian Anderson		
1097	Cheryl Ivey		
1098	Carl Howard		
1099			
1100	Arner Chaudhry		
1101	John Witmer		
1102			Compassion. Sanity.
1103	Fabian Herrera		
1104	Chuck Graver		
1105	Joyce Hunt		
1106	Ilse Hadda	This is a travesty. Either the WM Chemical Waste Dump should be cleaned up, or the people living in the area should be relocated to an area where it is safe to have children and to live. WM should be made responsible for the medical bills and loss of life.	
1107	Kent Wilson		
1108	Serpil Celik-Ramsay		
1109	Cathy Bledsoe		
1110	john strauss		
1111	Annay Perez		
1112	Laurie Kasparian		
1113	Tom Wells		
1114	Alan Freedman		
1115	Michelle Ku		
1116	Ruby Weeks		
1117	Andrea Saunders		
1118	Michele Raja		
1119	Harvey Picker		
1120	Jeremy Peters		
1121	Kimberly Gelinias		
1122	Jacklyn Burns		
1123	Todd Clark		
1124	Edward Rengers		
1125	Agnes Raeder		
1126	Zia Islam		
1127	Richard DeFazio		
1128	Mayellen Henry	We need to quit creating the toxic materials, not exposing innocent people to them in their homes. Anything you would not dump in wealthy neighborhoods you should not dump in poor ones.	
1129	Donald Shaw		
1130	James Cleek		
1131	Nancy T. Rockwell	Toxic waste endangers everyone, especially the very young and vulnerable. We should stop dumping and start cleaning.	
1132	Tammera Bravo		
1133	Juan Carlos Chaparro		
1134	Edith M. Conrad	Going to double the number of children you kill as long it is in someone else's community or someone else's child.	
1135	Thomas Giblin		
1136	Rogers Turrentine		
1137	June Sale		
1138	Bonnie Jean Brown		
1139	Carol Cox		
1140	Richard Hieronymus		
1141	Frank Lutz		
1142	Howard Petlack		
1143	Harriet McCleary		
1144	Joan Kelly		You are ruining this earth! Shame on you.
1145	Marina Gutierrez	protect the people	
1146	hilarly malyon		
1147	Lisa Niermann		
1148	don gerstman		
1149	Helen Mourra		

Comment Number	Name	Comment
1150	Shirley Ferguson	
1151	gene chorostecki	
1152	Steve Morse	
1153	Bruce Denny	
1154	Felicity Jones	
1155	sandra silva	
1156	suzanne ventura	
1157	Larry Courtright	
1158	Therese de Vet	
1159	Deanna Stillings	
1160	Daniel Binda	
1161	Cathleen Ketcham	
1162	Enedelia Obregon	Why do dumps always end up in the middle of poor communities of color? If this is so necessary, may I suggest placing it in the back yard of the CEO.
1163	Bill Marvin	
1164	John Flynn	
1165	Lee Hodges	This is perposterous! America has to do better if we are going to spread our message of human rights.
1166	Jared Cornelia	
1167	Mikail Barron	
1168	Elaine Andrews	
1169	Max Murillo	
1170	dan ryan	
1171	John Koenig	
1172	Larry CARNEY	
1173	Robt Scouras	
1174	Daniel J. & Robin Sanchez	
1175	Judi Muller	
1176	Ben Brooks	
1177	Barbara Kopelman	
1178	Sharon Penprase	
1179	Corina Rojo	
1180	sheryl Gillespie	
1181	Tracey St. Peter	
1182	Randy Yates	
1183	Pandora Edmonston	
1184	Bill Wharton	
1185	dennis reifsteck	
1186	Sue oltz	
1187	Eric Fosburgh	
1188	Valerie Heinonen	
1189	Paul Schneller	
1190	Gustavo Padilla	
1191	Laurel Shoemaker	
1192	Ed Schroeder	
1193	Carol Burnett	This is horrible and must be stopped!!!
1194	Jeff Zander	
1195	Harold Jones	Another example of the rich and powerful showing their contempt for the "lower classes." The lives of these people mean just as much as the lives of the executives.
1196	Chris McCarty	
1197	Sandra Koch	
1198	Lance Robert	
1199	Jeff Klein	
1200	Elke Hoppenbrouwers	How can we do this to people? It is outrageous.
1201	Joanne Feinberg	
1202	William Doering Jr.	
1203	George Mierisch	
1204	Kay O'Laughlin	
1205	James Johnston	
1206	Shauna Hughes	
1207	Jeanne Marklin	
1208	linda fitzpatrick	
1209	martin blasco	This is unacceptable. A crime against the people of Kettleman City.
1210	John Logan	
1211	Albert Valencia	
1212	Edwin Martin	Crud by any other name is crud, and gross and evil and polluting. The country is watching you. This sounds like another example of corporations running wild in the pursuit of money and not the welfare of the rest of us.
1213	Carroll Peterson	
1214	hector reillo	
1215	Jeff Rudisill	
1216	Sandra Galindo	
1217	Eileen Prefontaine	
1218	Matt Wright	

Comment Number	Name	Comment
1219	James Silliman	
1220	John Peterson	
1221	Ben McDonald	
1222	Kathleen Wang	
1223	Brian Waak	
1224	Greg Kimber	
1225	Linda Waine	
1226	Sharon Weiner	
1227	Michael McMahan	
1228	john davis	
1229	Françoise Bontl@	
1230	Aletta Kraan	
1231	Kerry Canfield	
1232	Bill Leikam	
1233	Cort Brumfield	Your support is absolutely vital.
1234	Sally Small	
1235	James Doten	
1236	Linda Nozicka	Would you want this in your backyard?
1237	Brian Erickson	
1238	Laura Hanks	
1239	Don White	
1240	Peter Adolay	
1241	Jill Sheridan	
1242	Jahnvi Stenflo	
1243	John Crotty	
1244	Randall Cook	
1245	Enid Rosenblatt	
1246	Jerry Patel	
1247	Rachel Schwartz	
1248	Jeremy Griffith	
1249	sherry owens	
1250	Catherine Hirsch	
1251	Gary Greif	
1252	carol banever	
1253	Scott Bishop	
1254	Gerard F. Gaudin	
1255	Ed Armas	The California Dept. of Toxic Substances Control would never site the opening or expansion of a toxic waste plant in an Anglo community; but since Latinos and Blacks are considered disposable trash they proceed to practice industrial genocide on those two communities. The equivalent: Agent Orange in Vietnam. Stop the racism stop the plant expansion.
1256	Yvonne Hansen	Legislators and their families are surely subject of these toxins and thus are vulnerable to illness, pain, and severe damage.
1257	Louise Neu	
1258	Diana Wilson	This is a real scandal.
1259	Julie Amato	This is abominable! This Dump should NOT be expanded....can't they see the results of this...? Miscarriages, and horrible birth defects and CANCER galore....why don't they CARE.....?
1260	Sandra Cohen	
1261	Susan Jordan	Who will stand up for what is morally right? The people of this town need a strong voice to represent their interests - one that can withstand the onslaught from WM.
1262	Jay Shellen	
1263	Dean Pryer	
1264	Eleanor Hayes	
1265	Rebecca Rens	This is very sad and the toxic waste must be handled more responsibly. They need to stop dumping toxic waste on these hard working Hispanic people.
1266	Karen Kirschling	
1267	Jessie Kainz	
1268	Edward Thornton	
1269	Suzanne Hesh	
1270	Francis Grabau	
1271	William Bader	
1272	David Chandler	
1273	Wayne Steffes	
1274	Igor Tandetnik	
1275	Terry Aunkst	
1276	Shaun Marie Levin	
1277	Donna Jensen	
1278	Debbie Newell	
1279	Beth Spindler	
1280	J Beverly	
1281	darin somma	
1282	Carol Bennett	

Comment Number	Name	Comment	
1283	Joseph Holmes	If the citizens of Kettleman City are being exposed to elevated levels of toxic chemicals on account of the presence of the waste dump, there must be a full and complete restitution made, and all future contamination must be prevented. Otherwise the entire facility should be removed at W/M's cost and dealt with in a 100% clean and responsible fashion. Zero emissions, ever, into the local environment of any dump.	
1284	Michael Oaks		
1285	Barbara Mendieta		
1286	Kathy Nickodemus		
1287	David Edwards		
1288	Teresa Mays		
1289	janelle wenber		
1290	Gail Heylmun		
1291	Mary Ann Ford		
1292	James Melloh, MD		You are carelessly disregarding human life and welfare. The reason you have a job is to protect people, not to enable those who wantonly harm them. Please do your job.
1293	Peter Berner		
1294	Ruben Garcia		
1295	Sharyn Dreyer		
1296	Eric Bayon		
1297	Katherine Farago		
1298	robert medeiros		
1299	Rachel/Rae Pearson		
1300	Thomas Kaplan		
1301	Carlos Nunez		
1302	Mona Dube	The irresponsible poisoning of poor people must stop. Please do your job and protect those that cannot protect themselves.	
1303	Raul Anorve		
1304	Lucinda Ewing		
1305	Alberto Gutil@rrez		
1306	ron huerta		another reason why organic is not such a bad ideal
1307	Tim Martinson		
1308	Stephen Sanderson		
1309	Teresa Koschmeder		
1310	Richard Fairfield		
1311	Joseph Lawson		
1312	Jessie Casteel		
1313	Kellie Smith		I heard Obama say recently ..."Democracy brings Stabilization". it has become..."stabilization for the few...." To me, over these last 20 yrs, it appears that the 'FEW' are more and more the large companies / corporations who for some reason are allowed to produce toxic waste/ toxic air/ with the attitude "...we know about it but we really don't care". It is shameful to view - this once great nation free falling from its original glory. Unfortunately many clueless citizens who don't even realize that Obamacare and the Affordable Care Act are the same thing but intentionally distorted by the Republican Party to keep them clueless? Let us Hope some light finally enters their dark void.
1314	michael graham		
1315	Nicholas Zizelis		
1316	susan messerschmitt		
1317	Stanley stahl		
1318	Doris Kelly	Corporations have destroyed too much of our environment. Enough!	
1319	Kathy Kormanik		
1320			
1321	Carol Ashley		
1322	Patricia Quimby		
1323	James Lutz		
1324	Ted Steege	One more atrocity brought to you by our corporate/political overlords.	
1325	Aurora Ruhe		
1326	Gustavo Sandoval		
1327	Sheila Mattingly	This is shameful! People are not disposable and this toxic dump should be cleaned up entirely -- at government expense!!!	
1328	scott lind		
1329	Ronald Salma	Why does the media ignore the poor? I don't put all the blame on the corporations as they are what they are but I do blame the lazy main stream media for not reporting these events. Yes CNN and network news that means you! Don't forget the lack of regulation and enforcement of what little there is. Simply money corrupts politics which allows them to get away with this.	
1330	Wendy Oser		
1331	Anthony Jackson		
1332	Rosalie Pinkert		
1333	Javier Amaro		

Comment Number	Name	Comment
1334	Stuart Weiss	
1335	karen stickney	
1336	Robert Obeid	
1337	Lisa Ouazzani	
1338	Randy Thill	It is very important that the chemical waste areas around Kettleman City be investigated and given higher safety requirements ...with refusal to allow enlargement until they have proven that they are not endangering citizens of the area with their management practices. Do not allow them a larger area to contaminate more land and citizens until they are capable of running the area they already have responsibly.
1339	Kristin Debar	
1340	Tomas Rodriguez	
1341	Quida Jacobs	
1342	Constantine N. Kossifos	
1343	Mark Rudningen	
1344	Daniel Podell	
1345	Frank Detrich	
1346	William Davis	JAIL the polluters! Nationalize companies that pollute!
1347	Robert Cox	SHAPE UP
1348	Leah Garcia	
1349	Beth Levin	
1350	Ed Gould	
1351	Abdul Vohra	
1352	gene ankl	
1353	Karyn Gil	
1354	Susie Sympson	
1355	Bill Ferullo	
1356	Vafa Ansarifar	
1357	Paul Ripley	
1358	Carol Henderson	do not expand this is very bad for the people
1359	Marsha Weisfeld	
1360	Les Rees	
1361	Ann Jones	
1362	jim weber	
1363	Donn Carroll	
1364	Richard Lancaster	We already went through all this in the early 90s with Greenpeace. What the hell are you people thinking?
1365	Katherine Parsons	
1366	Anita Richardson	
1367	Douglas McNeill	
1368	Debbie Smith	
1369	Halimah Martin	This sounds like Erin Brockovich all over again, her story made known by the movie of the same name starring Julia Roberts!
1370	Peggy Page	
1371	James Burks	
1372	Steve Foss	
1373	Julie Skelton	
1374	Franco De Nicola	
1375	Diane Rockerhousen	
1376	Nancy Kingston	
1377	Nancy Porter-Steele	
1378	Adina Parsley	
1379	James de Crescentis	Shut them down, and put the owners in prison.
1380	michele wojcicki	
1381	Jean Gore	
1382	Paul Szymanowski	
1383	Mary Whitmore	The toxic waste dump should not be expanded unless the company buys up all the properties of those that want to leave the area and helps them move.
1384	Larry Magee	
1385	David Bergen	
1386	Grace Burson	
1387	Jose Saleta	
1388	Jim Lykins	Corporations do NOT have a right to poison the land, the air, and people!
1389	Stephen Flora	
1390	Kathleen Thomas	It's cruel and disgusting that American industry and government agencies would be allowed to create this waste in the first place. And especially to a community that has suffered so much already.
1391	Tom Tripp	
1392	virginia mareks	
1393	Terry Moore	
1394	Andrew Frey	
1395	John Bronson	
1396	Louise Rickard	
1397	james schroeder	

Comment Number	Name	Comment
1398	Jorge Perez	
1399	Lawrence Clark	
1400	Cynthia McMath	
1401	Terril Tompkins	
1402	Thomas Crothers	
1403	Brant Kotch	
1404	Lucero Aguiniga	THIS IS ENVIRONMENTAL RACISM!
1405		Dumping garbage on unsuspecting people is wrong.
1406	Rebecca LaGesse	
1407	Neil Sullivan	
1408	Carol Gigliotti	
1409	Sara Leviten	
1410	Ke Chiang Hsieh	
1411	Ilsa Lottes	
1412	Jesse Sanford	
1413	Linda Kane	
1414	Anthony Palucci	
1415	Carrie Garnett	
1416	Ismael Abdulkadir	Stop polluting mother earth
1417	Chad Alvarez	
1418	Arnold Baruch	
1419	Paul Lapidus	
1420	John Markon	
1421	Cloud Moss	
1422	Mark Leiner	
1423	Lareta Finger	
1424	Glenn Mitchell	
1425	Michael Toner	
1426	Christian Hartleben	
1427	Luan Le	
1428	Alexis Mohr	Big money always wins out over humanity. It's time to turn that around.
1429	Diane Dauten	
1430	John Steinbach	
1431	Royal Elmendorf	
1432	Mark Battiste	
1433	Sara Brandon	
1434	Sheila Haley	
1435	Anthony Pasco	Contributing to death, disease, birth defects, cancer, etc, is not what your department is supposed to be doing. Look at the potential human toll instead of approving an enlarged "killing zone"
1436	Jay Clawson	
1437	Bonnie Faith-Smith	
1438	William Cumming	
1439	Joshua Angelus	
1440	Patricia Greene	
1441	John Halloran	
1442	Corinne Hollings	
1443	Sol Schneider	
1444	Melanie Bartley	
1445	Andrew Reegen	
1446	Colleen Bonilla	When are we going to start putting human (and other) life before profit? This dump should be removed entirely, not expanded!
1447	Shannon Littrell	
1448	Melissa Sena	
1449	Cristina Noble	
1450	Stephen Brittle	
1451	Lindy Metz	
1452	Brenda Troup	
1453	Henry Kielarowski	
1454	William Hofsess	
1455	Marilyn Waltasti	
1456	Tina Brenza	
1457	Donald Farley	
1458	Joanne Fetting	
1459	Jane Baker	I am pleased to sign this petition--I hope and pray it does some good.
1460	Ernie Nickels	
1461	David Oddo	Stop preying on poor people!!!
1462	Susan & Robert Mar ett	
1463	Jeannie Roberts	
1464	Robert Michlowitz	
1465	James Kotchmar	
1466	Robert Parker Stellato	
1467	Tim Milam	

Comment Number	Name	Comment
1468	Stacy Hall	
1469	Helen Scipio	
1470	Jim Redmond	A company the size of Waste Management owes it to their customers to minimize the health risks and not rely on public relations stunts to assure the public all is okay. Locate the toxic dump in a high income community and then you will pull out all the stops to guarantee their health. Or cut into your profit in order to reduce the risks.
1471	John McDevitt	
1472	David Arntson	
1473	Thomas Giles	
1474	Jo Anne Leo	
1475	Sheila Low-Beer	PLEASE!!! Aren't you afraid of the huge lawsuit that you face?
1476	Tony finnegan	
1477	Valerie Gilhooly	
1478	Jerry Bloomer	
1479	paul wittrock	Sick of hearing of "jobs" as the excuse to approve bad proposals that pollute and make us sick. NO on the expansion of the toxic waste dumping, in fact, SHUT IT DOWN NOW.
1480	Enzo Bard	
1481	Douglas Long	The rates of cancer and birth defects point to a problem. Please protect these people from toxic waste.
1482	David Ireland	
1483	Marcia Bailey	
1484	Ronald Groves	
1485	Walter McGerry	
1486	Pete Sea	
1487	Christine Roane	
1488	Morgan Powell	
1489	Benjamin Martin	
1490	Damon Saltzman	
1491	sheila wyse	
1492	steven wilson	
1493	Joyce Mast	
1494	Deborah Nicholson	
1495	Shel Anderson	
1496	John Gordon	
1497	David Smith	
1498	Robert Wales	
1499	Margaret Moreland	
1500	Pash Galbavy	
1501	O. Lamoree	How many more kids have to die in the name of Trash Money?
1502	Catherine Ward	
1503	Frances Enriquez	
1504	Rolf Radicke	Your job is to stop the dumping of toxic substances, not the circumvention of the law.
1505	Tina McKim	
1506	Luise Knutson	
1507	Janice Nickel	
1508	Janet Olson	
1509	Joanne Tyler	
1510	Maureen Mc Kinney	
1511	Dave Hornstein	
1512	Lemuel Smith	
1513	s scales	
1514	Pablo Moore	
1515	Shirley Smith	
1516	Rita Butler	If this was a town of rich white people this would not be happening.
1517	Lorrie Ogren	
1518	Jose Miranda	Stop the killing of childs and adults.
1519	Vern Maresh	
1520	Jackie Tryggeseth	
1521	Abbie Jenks	
1522	Herbert Jeschke	
1523	tim mcnemar	
1524	Chris Washington	
1525	Keisha Evans	
1526	Mark Wirth	
1527	Peter Bentivegna	
1528	Thomas Coombs	Stop it completely and shut it down !!
1529	Joy Cunningham	
1530	Nicole Howard	
1531	Rhoda Becker	
1532	Glen Anderson	Protect PEOPLE from TOXIC waste!!!
1533	Mike Kolpack	

Comment Number	Name	Comment
1534	Elizabeth Choate	
1535	Scott Burger	
1536	James Sheley	
1537	jaime ortiz	
1538	nicole sears	
1539	Patrick Hartnett	
1540	sydney antonio	
1541	Eric Weaver	
1542	Shamaine Henry	
1543	Benton Boothby	
1544	Raimundo Sarabia	
1545	Jo Anne Fannin	
1546	sybille dubois	
1547	Donald Hyatt	
1548	Mary OByrne	
1549	lisa padilla	Not Cool
1550	Roland Goyette	
1551	Luciana Hall-Pearson	
1552	Sammy Low	
1553	Robert Butler	
1554	Gwen Hadland	
1555	Mary Jane Hyde	
1556	Sheila Malone	We must save the farm land and the protect the people who work in the fields. We can not survive if we have no top soil or water.
1557	Tony Kane	
1558	Daniel Hofmann	
1559	Sandra Vera	
1560	Tina McCafferty	all people should be protected. do the right thing and help the harmed.
1561	Rob Jenkin	
1562	Karen Garner	
1563	David Fellner	
1564	James Wilson	
1565	Betty Hartzler	
1566	Jenna Rumberger	
1567	Susan Linden	
1568	Pris Miller	
1569	angela horan	
1570	Marion Hulen	
1571	John Limbach	
1572	James Ropicki	
1573	Wanda Ballentine	
1574	Jessica Rocheleau	
1575	Elizabeth Eisner	
1576	monroe jeffrey	
1577	Susan Chandler	
1578	Sean McLean	
1579	Stanley Palombo	
1580	dixie tracy-kinney	
1581	Jim Mansmann	
1582	Suzanne Pena	
1583	chuck countryman	
1584	John Tischhauser	
1585	James Sagle	
1586	John Eberenz	
1587	Ricardo Lujan	Stop the expansion of of the dumpl
1588	Jane Walsh	
1589	William Goldman	
1590	Rick Huyett	
1591	Sarah Winblad	
1592	Heather Files	
1593	Linda Lindquist	
1594	Barbara Warner	
1595	Darren Showers	
1596	Eng Wu	
1597	Maimoona Ahmed	
1598	frank depinto	
1599	Paige Harrison	
1600	Lawrence Williams	
1601	June Hurst	
1602	rebecca harmon	
1603	Mike Sherman	ALL companies must be accountable for their actions, waste and clean up- why is this still an issue- Make Them Responsible....
1604	Ted Fishman	

Comment Number	Name	Comment
1605	paulette clarke-wood	
1606	Aileen Montour	
1607	Silvio Fittipaldi	
1608	N Welch	
1609	Ron Bridges	
1610	Mary McRae	
1611	Debra McDaniel	Would you put a toxic dump in Boehner's backyard or even your own? I don't think so. So why is it okay to poison an entire town of non-whites? Put it in your own backyard if it's so safe and then we'll see about letting it back in ours.
1612	sarah J s	
1613	Cheryl Laos	
1614	Roy Hess	
1615	Kathryn Dalenberg	
1616		
1617	David Richard	
1618	jane larsen	Toxics should never be dumped anywhere!! It contaminates soil, air and life.
1619		
1620	Chad Nester	
1621	Amy Conley	This is outrageous.
1622	Cynthia Mace	
1623	Emil Reisman	
1624	Martha Arreguin	
1625	Eldon McMath	
1626	Michael Sidey	Why does this town need such a dept? Is that their version of the Health Dept?
1627	David Cline	
1628	Julie Lynch	
1629	Dieter Randolph	
1630	Larry Treece	
1631	Nikki Pacheco-Theard	
1632	Bryan Bremner	
1633	barbara henault	Dispicable
1634	Colin Foster	
1635	Denise Curry	You probably wouldn't want this dump in your backyard.
1636	Kelley Smith	
1637	Julia Marie Gillett	
1638	Michael sCHAEFFER	
1639	agustin gonzalez	dumping toxic chemicals on people who can't defend themselves is inhumane .
1640	Barbara Lamb	
1641	Anthony Barletta	
1642	William Brice	Abolish the DTSC. Another useless, corrupt federal agency that has to be eliminated.
1643	nancy badura	
1644	Barry Rabichow	
1645	Polly Tarpley	GUILTY!!!! Dept. of Toxic Substances Control and Waste Management! GUILTY of lies, GUILTY of evasion, GUILTY of killing babies and damaging babies! What is not understood? Follow the money. There are doubtless lobbyists funded by these organizations, who are "greasing" the palms of members of the government to push through their heinous plans. The citizens of Kettleman City, regardless of their race, creed or color, deserve to be treated as human beings, not as chattel!! Shame on all who are allowing this travesty to continue.
1646	Steve Henry	Where on earth it Governor Brown in the middle of all this horror?
1647	Joan Abruzzo	
1648	Maria Luisa Contreras	
1649	Lois Wagner	
1650	David Michael	
1651	paul angell	
1652	Iris Biblowitz	
1653	Sandra Stratton-Gonzalez	
1654	Eric Miller	
1655	Colleen Fitzgerald	
1656	william cuppioletti	
1657	John Sefton	
1658	Robert O'Brien	
1659	Fred Lavy	
1660	Elaine Sorensen	
1661	Marylucia Arace	
1662	Allen Hengst	
1663	mrary darling	Stop! Dumping! Toxic! Junk!
1664	Blair Dunn	
1665	antonio martinez	
1666	Athena Huff-Sandstrom	
1667	joe wolf	

Comment Number	Name	Comment
1668	Rosalind Lord	Toxic wastelands shouldn't be allowed to exist. They're one of the reasons the world is in a water crisis.
1669	Theresa Knapp	
1670	Christopher Lish	
1671	Audrey Burns	
1672	Nancy Jones	
1673	John Witter	
1674	Carla Happel	
1675	Dawn Walker Cinco	
1676	Bonnie Margay Burke	
1677	Aimee Cheek	
1678	Michael Manes	
1679	Robert Anger	
1680	Doris Munger	
1681	Nancy Drigotas	
1682	Carol Glenn	
1683	Judith Mackenzie	
1684	Gail Winter	
1685	Gladys Fahrenkopf	
1686	Timothy Baures	
1687	Bobbie Flowers	Stop the dump!!!
1688	Fred Ingman	
1689	Katherine Nelson	
1690	Donald Toms	
1691	Nancy Michon	
1692	Juliet Ortiz	
1693	Raymond DiCarlo	
1694	Phillip Hoff	
1695	Cs Symington	
1696	Elena Kermani	
1697	Merjean Morrissey	
1698	Leslie Washington	
1699	amanda elder	
1700	Barbara VanHorn	
1701	Julia Johnson	
1702	Vicki Plant	
1703	Paul Burks	Yes, don't allow this dump in Kettleman City to be expanded. It poisons children and adults.
1704	Joseph Owen	
1705	Aishah Hassan	
1706	S. E. Williams	
1707	Richard Bourne	
1708	winnie foster	
1709	Richard Kacmar	
1710	Richard Falzone	How bad will it get before the general population realizes that this nations regulatory agencies have been eliminated? Nearly every institution designed for the benefit of the country as a whole with a mandate to act with honor and national pride has been purchased by the highest bidder.
1711	Ronald Munia	
1712	Lindsey Davis	
1713	Sassan Sahami	
1714	Ritchie Albert	
1715	Thomas Trujillo	
1716	Elmo Dunn	
1717	Jamie Bryan	
1718	Lois Kaufman	
1719	Amber Arnold-Anderson	
1720	Vaughn Hopkins	
1721	Doug Simmer	Good luck fighting big corporate lobbyists.
1722	David Strasser	
1723	nick wilde	
1724	John Wright	C'mon, we can do better than this,
1725	Linda Montalvo-Moramarco	
1726	melissa laste	
1727	Jack Palmer	
1728	t chase	
1729	S Pena	I stopped in Kettleman City this summer at a McDonald's off the 5 Freeway. Instead of a soft drink I asked for a cup of water. It was the WORST tasting water I have ever had. Now that I know there is a huge toxic waste dump nearby, I can connect the dots!!!!!!
1730	Linda Oldham	What a horrible way to treat people. Bless those sweet children.
1731	Francine Ungaro	
1732	Allen Eickstaedt	
1733	Richard Johnson	
1734	Sara Kalter	

Comment Number	Name	Comment
1735	Elizabeth Raymer	
1736	JoAnn Keenan	
1737	Caryn Cowin	
1738	Katherine Hanna	
1739	Edward Spevak	
1740	garry nemeth	
1741	Fred Morrison	
1742	Victoria Ward	
1743	Alex Silverio	
1744	michael schuessler	
1745	Evelyn Gamble	
1746	Kirk Lewis	Does California really need to import toxic waste for profit? Time will take those same pollutants to the SF bay area, poisoning everything on it's way. Killing people and poisoning the environment to meet a bottom line is not the American dream, nor the California way. We must stop these money hungry capitalists from dumping toxic waste in any Americans home town. Especially those who don't have a voice in California policies because of they're bottom line. Kirk Lewis, Davis Ca.
1747	Joanne Zipay	
1748	Sue Fisher	
1749	ben dugger	How would youlike to live near a dump?
1750	Kristyn MacPhail	
1751	Noreen Acee	
1752	Deirdre Casserleigh	
1753	Leda Jahnke	OMG how can denied it
1754	Dolores Pino	
1755	Andrew Rowlands	
1756	Amanda Woolever	
1757	William Prince	
1758	Louis D.	
1759	Elena Macias	
1760	Elisa Velasco	
1761	PriscillaDean Vance	
1762	Rev.Thomas Ivory	What a sad and tragic commentary!
1763	Emily Collins	
1764	kathryn hetzel	
1765	Judith Martinez	
1766	Janet Callum	
1767	Sharon Wallace	
1768	James Pluta	
1769	Bob Hamburg	
1770	Michael Monday	
1771	Mouna Wilson	STOP IT!
1772	Jo-Ann Savoia	
1773	Stacie Taylor	
1774	Karen Pedersen	This is despicable! CORPORATE CEO's ARE UN-PATRIOTIC IN DESTROYING THE COUNTRY AND SHOULD BE TRIED AND THROWN IN THE HAGUE AS TERRORISTS!
1775	Russell Bair	
1776	Virginia Johnston	
1777	Bryan G. Hawley	
1778	joel mulder	Old and Ugly news
1779	Brenda Gutierrez	Stop polluting and killing our communities, it will eventually catch up to your kids!
1780	Lydia Newcomb	
1781	Joan Billeci	
1782	Diana Iratoo	
1783	Mike Brooks	
1784	Carl C Bowman	
1785	Decker Smith	
1786	david a woolsey	
1787	Patricia Crimmins	
1788	Neil Mcqueen	
1789	dean shrock	
1790	katherine burns	
1791	Adam Mizicko	
1792	Michael Tezla	
1793	Patricia Brech	As a retired RN, I have seen the effects of such dumps on the health of communities. Please do not expand this site! How can this happen in the USA? Don't we pay people in the government to prevent these kinds of abuse of citizens of this country!
1794	James Hall	
1795	Cynthia Stasko	
1796	Finhas Benyam	
1797	S Knapp	
1798	chris sanchez	

Comment Number	Name	Comment
1799	Maureen Mehler	
1800	J.M. Wornum	
1801	Dianne Walsh	
1802	Virginia Cowie	This is completely inhumane! Again, greed, power and a total lack of a conscience, heart or soul is what is going on!
1803	John Addley	Enough is enough! Public agencies should be in existence to protect the public interest NOT polluters and others acting against the public interest!!
1804	Mary Jones-Giampalo	
1805	James Pierce	
1806	Bruce Blacknight	
1807	Harriet Ingram	
1808	Fred Schwartz	
1809	Joe De Hoyos	
1810	sergio sanchez	
1811	David Contreras	
1812	Ann Cohen	
1813	Ray Teurfs	Hey, government: unusual amount of birth defects and you are going to expand the toxic dump before you find the cause?! This does not rise to the intelligence of a 3rd grader. So, how come you would allow it and not close it altogether?
1814	Teresa Schweitzer	
1815	Nancy Ramsden	
1816	Robert Sublett	
1817	john elliott	
1818	mark gannett	
1819	Terry Shetler	
1820	Rafael Ormino	
1821	Dori Grasso	
1822	Allison Miller	
1823	Sara Shutkin	
1824	Priscilla Shade	Unconscionable!
1825	John Vam Horn	
1826	ANN BAKER	
1827	Thomas Ferrito	
1828	Virginia Davis	
1829	T. Ed. Webb	
1830	Roy Edfast	
1831	Michael Miller Jr	
1832	Orlando Olmo	
1833	Kathy Barnarr	
1834	Dinah McKay	Protect the people--not polluters!!
1835	maureen saxon	
1836	Richard & Carol Mannis	
1837	James Brister	
1838	Gilbert Woolley	
1839	Bob Rolsky	
1840	Jerrie Meadows	
1841	Chris Hogger	
1842	douglas sedon	
1843	Thomas Blanton	
1844	Robert Brosius Jr	
1845	Greg Nichols	
1846	Cynthia Feinberg	
1847	deborah brandt	
1848	Jim Kaedden	
1849	George Tolleson	
1850	Dominic Marino	
1851	Joan Tangen	
1852		Remember Erin Brochovich? Are human lives really worth an expansion of the bottom line?
1853	marian rondon	
1854	John Wiles III	
1855	James Klein	
1856	Dalia Zatkan	
1857	J Pinkney	
1858	Dawn Lyons	
1859	Teri Rodriguez	
1860	Shannon Healey	
1861	Philip Dennany	
1862	Galen Davis	
1863	Kris Harker	
1864	Michael Peters	
1865	Mina Baccelli	
1866	William Mead	
1867	Timothy Mullen	

Comment Number	Name	Comment	
1868	Maura Stephens	Good grief, people, have we no shame? Is the entire world our toxic dumping ground -- including our own front yard, where our future leaders live? Stop the dumping and stop the creation of so much hazardous waste in the first place. We can start by eliminating all fossil fuels; it can be done.	
1869	Achebe Powell		
1870	Linda Cummings		
1871	jc sarmiento		
1872	Ruth Seeliger	Toxic Waste is an anathema to the planet, the people who live near toxic waste facilities, and...the people who work for Waste Management. WM needs to cancel this intended expansion, pay reparations to the citizens of Kettleman City and put time, effort and money into finding ways to detoxify waste in a safe way. They can't do it alone. Other such companies and the governments under which they operate need to work on a plan to help citizens to reduce toxicity and waste and contributing to the health of the nation. We are all in this together. What affects one, affects all.	
1873	Dylan Abramovich		
1874	joyce schwartz		
1875	Robert Callahan		
1876	joseph nieves		
1877	Ian Cook		
1878	Ra Nai		
1879	Joe Jurcisin		
1880	Jonathan Draudt		You work for the people, not corporations. We pay you to do this work on our behalf, you cannot accept anything from corporations to work on their behalf. You are not DOUBLE AGENTS! If you are, you should resign NOW, or else you are committing TREASON. Period.
1881	Cherilyn Larsen	This is most horrible. Maybe the regulators and polluters should be made to live in this filth and squalor so they understand the havoc they create!	
1882	Jessica Foster		
1883	Preston Collins		
1884	Robert L. Derbyshire		
1885	Linda Childs		
1886	Anton Sober		
1887	Kathryn Kind		
1888	Stacie Charlebois		
1889	Susan Shaw		
1890	William van Doorninck		
1891	Paul Horne	Disgusting, and "under the radar" until now....	
1892	Nancy Roberts-Moneir		
1893	Sis Everly		
1894	Maegan Prentice		
1895	Sherry Alpert		
1896	Joseph McPherson		
1897	Sally Hinshaw		
1898	Leonora Rianda		
1899	A David		
1900	Deborah Smith	IS THIS WHAT AMERICA IS ABOUT. UNLESS YOU ARE RICH YOU DO NOT MATTER, AND YOU DO NOT DESERVE A GOOD, HEALTHY PLACE TO LIVE???? SEEMS TO BE THE THINKING. THIS IS NOT RIGHT, NOT FAIR, PUT THE DUMP IN A RICH NEIGHBORHOOD, SEE HOW WELL THEY LIKE IT.....JUST AS GOOD AS PUTTING IN A NEIGHBORHOOD WHERE SOMEONE DEEMS THESE PEOPLE DESERVE TO LIVE IN A DUMP.....THEY ARE NOT IMPORTANT OR EQUAL TO OTHER PEOPLE IN THIS COUNTRY!!!! SHAME!!!!!!	
1901	David Aylward		
1902	richard byrd		
1903	James Moffitt		
1904	David Saul	Having driven past there and stopped in for gas, etc., I can personally attest to the presence and smell of the waste held there.	
1905	James O'Connell III		
1906	Doug Landau		
1907	Ellen Wright		
1908	Eric Vance		
1909	John Cavaliere SFO		Amazing!!!
1910	Dani Duke		
1911	Rick Wood		
1912	Paula Wallace		
1913	Brent Foland		
1914	Connie Crusha	Poisoning people for money is NEVER acceptable.	
1915	Thomas Reeck		
1916	jeanette gruber		
1917	Edward Mashintonio		
1918	Harriet Cowper		
1919	Trina Kaplan		
1920	Robert Gifford		
1921	john eschen		Bad, very bad, real bad indeed.
1922	Lillian Martinez		

Comment Number	Name	Comment
1923	Sandra Uribe	
1924	Leslie Feuille	
1925	Greg Booth	
1926	Cathie A. Ehr	
1927	Craig Kaspark	
1928	Stephan Hanna	
1929	Stephen Smith	
1930	William Cross	
1931	Graham Jessop	
1932	Sterling Proffitt	
1933	Deborah L Born	
1934	Julio Aviles	
1935	Gerald Speller	
1936	tehan carey	
1937	Elly richards	
1938	Stephanie Mory	
1939	Lisa Vandermay	
1940	Robert Senter	
1941	ann Roos	
1942	P Martinson	
1943	Jan Stewart	
1944	Kirsten Barquist	The Kettleman Hills area toxic waste dumps have been a problem for a long time. Two things need to happen: Kettleman City needs to be relocated, and these dumps need to be converted to processing and incineration facilities rather than just giant cisterns. The reality is that toxic waste needs to go somewhere, and it needs to be handled intelligently. Dumping it in poor communities is not handling it intelligently, or fairly, or appropriately.
1945	R Racoon	
1946	Kathleen Woolley	
1947	Charles Nichols	
1948	Vivianne Mosca-Clark	Toxic, poisons all hurt life forces. They need to stop being made. The companies that make the toxic waste needs to be responsible for their production of it.
1949	Patricia Baley	
1950	Thomas Duggan	
1951	Thomas Duggan	
1952	Thomas Duggan	
1953	George Bush	WE CANT GET FOOLED AGAIN!
1954	Thomas Duggan	
1955	Carol Chartier	Enough is Enough!!! We are destroying our world.
1956	Susan Egen	What a terrible, horrendous crime. Stop now and give restitution to those who have suffered so much loss due to this dreadful place.
1957	Thomas Gillespie	It's time to clean-up the mess, that you've already created, not add more!
1958	Gerald Fisher	
1959	Kenneth Rowland	As someone currently dying from exposure to chemicals of an unknown source, I don't know how anyone can willingly do this to another human being, let alone make profit from it!
1960	Rob Currie, S.J.	
1961	Mary Etta Moose	
1962	Denise Akom	
1963	Ted Ewald	STOP INFECTING AND KILLING THE CHILDREN!! Are you pro life? If you are, why do you dump toxic waste into the ground/air that will go into the water and air?
1964	Donald Davis	
1965	Alfred Cross	
1966	Eddie Fink	
1967	Jim Lambeth	
1968	Anthony Arcure	
1969	betty tyler	Stop, please.
1970	John Twohig	
1971	Charles Kroupa	
1972	Donald Obrien	
1973	Joan Anderson	
1974	Lois Jordan	
1975	Marie Jones	It's always the poor who work and live in these toxic areas created by the rich. What we need is a new revolution as stated by Thomas Jefferson so many years ago.
1976	Gloria Sennert	
1977	James Adcock	
1978	ruben neria	
1979	Ruth Pyren	Every dirty mess that any company creates should be required to be inspected and orders issued to clean up the mess... or else, CEO's go to jail

Comment Number	Name	Comment
1980	Nonie Muller	As an RN who has been practicing for over 40 years, I know that toxic waste can cause birth defects and asthma. I will not list other conditions and maladies because I don't have the facts for that. But if this town is suffering from an unusually high rate of infant mortality, still born births, birth defects, asthma and childhood cancers, then it doesn't take a research scientist to see that pattern. I SUGGEST THAT THE COMPANY BE REQUIRED TO DEMONSTRATE THAT THE CHEMICALS THEY ARE DISPOSING OF ARE SAFE AND HARMLESS.
1981	Paul Sawyer	
1982	Sonia Hernandez	
1983	Joe Meyer	
1984	Henry Coleman	
1985	Timothy Alstrum	No one should be allowed to so destroy the environment that it kills the people who in the surrounding area. It must not matter that the business has so much money that it can do as it wishes even if that kills are creates a harmful situation to the local community. What has happen to life liberty and the pursuit of happiness? Don't these have a right to these ideals?
1986	Beverly Linton	
1987	albert jewell	
1988	Cindy Lance	
1989	Mitzi Bandera	
1990	Carl Proffer	
1991	Fred and Louise Colman	
1992	Erin Butzen	
1993	Joan James	
1994	Harold Fisher	
1995	Jeffrey Smith	
1996	John Porter	
1997	Aislin Gerow	
1998	Yda Smith	This dumping NEEDS to stop. It is criminal to take advantage of those without the economic resources to have their voices heard be forced to suffer such horrific consequences for the sake of corporate greed.
1999	Colette Flake-Bunz	
2000	Orlin Braddy	
2001	Barbara Hadenfeldt	
2002	Patrizia Riccardi	
2003	Andrew Binkley	
2004	cindy houde	
2005	Richard Jones	
2006	Adam Sperry	
2007	Bonnie Weiss	
2008	Dan Wicht	
2009	Dennis Greve	
2010	Lenny Cavallaro	
2011	William Deckard	
2012	Lawrence Blacik	
2013	Juliann Pinto	
2014	Ricardo Companioni	
2015	Carolyn Kanter	
2016	Arlene Zimmer	
2017	Keelan Smith	
2018	Sally Springett	
2019	Jodi Armstrong	
2020	Mary Hartley	
2021	Patricia Brooks	
2022	Susan Miller	
2023	Arthur Daniels	
2024	Eugene D. Alexander	
2025	Doris Kelsey	Use the 90210 area for your dump!
2026	Clifford Graham	
2027	Magesh Jayapandian	
2028	Anthony DeAngelis	
2029	carol leighton	
2030	Leonidas Taylor	
2031	Patricia Crockett	
2032	Marcia Bond	
2033		
2034	Carolyn Woolley	
2035	tim wollen	
2036	Bonita Roper	I am going to write to my congresswoman and the Governor. What has happened to California. Have we sold out our beauty and people to BigMoney..what a shame.
2037	Fran Collette8	
2038	Wayne Oncale	

Comment Number	Name	Comment
2039	John McPeek	Instead, put this toxic crap in your own waistland — hey, why not use it for mulch at the Country Club?
2040	Connie Nowe	Should it be the people who own this company who were losing kids, I think the plan would change....Have a heart...these are babies being born, or not, being affected. From my observation, unless it is your family, it matter not, what happens....For once, make the changes to save these lives....Gotta' be Republicans, because they care not.....STOP the Expansion of this "TOXIC DUMP!"
2041	Bruce Cratty	
2042	Mike Brown	Reverse your greed factor which is 100% with your human compassion factor which is a BIG FAT 0%.
2043	Frederick Jones	
2044	Richard Rogers	
2045	Val Zampedro	
2046	Melissa Cathcart	
2047	Anthony Straka	
2048	Armando Aspiras	
2049	Karen L. Grossman	
2050	Johanna Roberts	
2051	Karen Peterson	
2052	steve phillips	
2053	mary deceault	
2054	Susan Harmon	
2055	ynez fernandez	
2056	Susan Antonides	
2057	Judith Cashin	
2058	Anton Feokhari	
2059	Stanley Scheller	
2060	Barbara Casillas	
2061	Daniel A. Jaimen	
2062	Robert Shultz	
2063	Maria Lara	
2064	Celia Scott	
2065	Michael cota	To the department of toxic substances control.Cease and disist your plans at Kettleman city?Or better yet insist that members of the board relocate their residences to Kettleman city. Think about it. If this is not possible how about proving that an expansion is safe by drinking bottled Kettleman city water for 3 years, to prove the safety of your decision.
2066	Ann Cobban	
2067	Charlotte Ward	I'm a Christian and a chemist. I know what this stuff can do and I care.
2068	Malik Hassan	
2069	Geneva Andrews	
2070	James Dixon	
2071	Ed Chalfant	
2072	Michael Elkins	
2073	John Gelert	
2074	Patti Batchelder	
2075	Amber Garlan	
2076	Daw Shepler-Hamilton	
2077	George Quasha	
2078	dee finn	
2079	Gwyneth J. Smith	I used to work in pediatric oncology and have seen the results of toxic substances used and disposed in the San Joachin Valley. You are responsible for keeping corporations from killing innocent people. Can you live up to that responsibility, or do people of conscience have to step in and push you to do it?
2080	Roger Briand	
2081	Charlene Ellis Bond	
2082	Kenneth Bickel	
2083	Jonathan Clapp	
2084	Shan Albert	I wonder if the folks approving this dump would be willing to live near it.
2085	ira ballen	
2086	matthew loughran	
2087	Floyd O'Brien	
2088	Don and Arlene Widman	
2089	sheldon sanov	
2090	Barbara Grove	Let's allow this expansion with the understanding that all upper management at the facility permanently relocate to Kettleman City!
2091	Daniel Tiarks	
2092	Shelley Schmidt	
2093	alan Kilmartin	
2094	Leo Ashton	
2095	Suzanne Carmona	
2096	Nanci Gosling Blackmarr	Don't just stop the expansion, CLEAN IT UP!
2097	Linda Ost	

Comment Number	Name	Comment	
2098	Gerald Wilmsen	Please put such toxic wastes in the wealthy peoples' neighborhoods because they have the power to fight against it.	
2099	Samuel Durkin		
2100	Sharon Barbell		
2101	Hugh S Hodgson		
2102	Charity Moschopoulos		
2103	Quinta Wilkinson		
2104	shannon miller		
2105	Harriet Bachner		
2106	Charlie Graham		
2107	P. Welland		States must not view Latino communities, Indigenous communities or poorer communities in general as places to blithely 'dump and forget' toxic waste. Let us all be Americans together and work for a just, universal environmental strategy to protect ALL our children in every state - and thus to protect their future. My heart goes to the people of Kettleman. You are not alone.
2108	Pamela MacLennan		
2109	Terry Dombrowski		
2110	Trudy Faries		
2111	Hannah Decker		
2112	Emily Willoughby		
2113	Craig Stallone		
2114	ahart Powers III		
2115	Rose Hernandez	People are more important than money. Please WM, ask yourself, does expanding your business at the cost of peoples' health, nurture your soul?	
2116	John McSwigan		
2117	Karren Baird-Olson		
2118	Hugh Moore		
2119	Aloysius Wald		
2120	Matthew Schaut		
2121	John Klingelhoffer		
2122	Keeley Harding		
2123	Roger Nystrom		
2124	Anne Rosenzweig		
2125	Lois Rene Dayton		
2126	Ms. Stacey A. Ward, Esq.		
2127	Michael Cooke		
2128	Frank Marwood		
2129	janyce meslin		
2130	Marlow Johnson		
2131	Richard Coan		
2132	Theresa Pretlow	This continued disregard for the health and wellbeing of other human beings is deplorable and must be stopped.	
2133	Brenda Jordan		
2134	Blaine Gorham		
2135	Andreina Granado		
2136	Paul Henderson		
2137	Scott Swanson		
2138	Barbara Bondurant		
2139	Sandi Cook		
2140	Fred Holden		
2141	Rita Day		
2142	Chad Ryan	We stand with you to stop corporate dumping	
2143	Nicholas Prychodko		
2144	Nicholas Sammond	I am a former California resident and graduate of the UC system. DTSC, please consider whether expanding this facility unfairly targets a community, benefiting others at their expense. If that is the case, then you are morally bound to reject this proposal. It is on you. Let us all be the grow ups.	
2145	Edmund WRight		
2146	Arleen Thompson		
2147	Anthony Buch		
2148	Gary Carone		
2149	Carol Donovan		
2150	Susan Walp		
2151	Paula Martin		
2152	Seth Bates		
2153	Greg Meyer		
2154	Ken and Donna Bubb	This place is shameful. Any care for the community? Time to clean up this shithole and send the waste directly to the front yard of the Dept. of Toxic Substances Control	
2155	corinne mcgrady		
2156	Harry Hersh		
2157	Chris Ruiz		
2158	Carol Collins		
2159	Dror Schneider		
2160	Jean Colombo		

Comment Number	Name	Comment
2161	Jason hollington	
2162	David Liebendorfer	
2163	Mr. And Mrs. Bruce Revesz	
2164	Robin Bowman	
2165	Timothy Gilmore	To end poverty worldwide, Read, %eÚUltimate Poverty, Unlimited Wealth", antigoldrush.com
2166	Annette Long	
2167	Linda Mae Chover	Stop poisoning the poor.
2168	Monique Keeling	
2169	Lois Brooks	
2170	Erica Himes	
2171	Enrique Baloyra	
2172	Dori Dumond	
2173	Jenny Schwartzberg	
2174	Isabel Sena	
2175	C J Wilson	
2176	Diane Stratton	
2177	Dorothy Reik	
2178	S Stark	
2179	Adolfo Caldas	
2180	Alethea Putnam	
2181	Loren Levy	
2182	Tovia Shapiro	
2183	geoff richcreek	
2184	Jane Merkel	
2185	William McGrane	
2186	Joyce Kasting	
2187	Rita Huntsman	
2188	michael macdonald	
2189	Andrew Dancer III	
2190	babs marchand	
2191	Denise Romesburg	
2192	Janice Wiecking	
2193	Peter, Marilyn Miess	
2194	Rolando Acevedo	
2195	Cherie Long	
2196	Elisa DeBoer	
2197	Janice Howard	
2198	anthony medina	
2199	Steven Prchal	
2200	Elizabeth Cooper	
2201	Steven Rhodes	
2202	Janie Bressler	
2203	Pat Blackwell-Marchant	
2204	Beverly Dahlen	
2205	John Soltero	
2206	Joanna Kling	
2207	Holly Kukkonen	
2208	Robert McCombs	Shut the dump down, it's that simple. Or make the CEO live there.
2209	Wayne Gibb	
2210	George Davidson	
2211	mark ornelaz	
2212	Gerrit Crouse	
2213	Yvonne Wootten	Your the largest hazardous waste dump this side of the Mississippi and to shockingly high rates of childhood cancer, birth defects and miscarriages! Don't you understand the words Hazardous and Toxic? Do not expand this Hazardous and Toxic dump causing even more disease and deaths! The entire world is on enough of a path to all Human demise with all types of dangerous chemicals, gases, air and water pollutions!
2214	Alfred Martinez	
2215	G Nierman	
2216	Linda Tansey	
2217	John Viacrucis	
2218	Carol Kreck	
2219	Adrianna Dinihanian	
2220	Kathryn Dalton	
2221	lance jordan	
2222	chris brazis	
2223	j angell	
2224	Chris Segura	
2225	Bernie Duran	This is the epitome of greed and inhuman mindset. How can the members of this department live with themselves? Will God have mercy on their souls?
2226	colin duggleby	
2227	Rhonda D Wright, MD	

Comment Number	Name	Comment
2228	Anne Munitz	
2229	Juliet Francis	
2230	Ray Morris	
2231	Don Glickman	
2232	Dave Dunkak	
2233	Aurora Sarabia	As a childhood farmworker, I was exposed to plenty of pesticides while working the fields of the San Joaquin Valley. Please stop the poisoning of our land and exposing people to these toxins.
2234	Jerry Orr	
2235	Donald Broyles	
2236	Maryanne Darner	
2237	neil anders	
2238	Glenn Perry	
2239	Ned Delaney	
2240	Ian Dogole	
2241	bonnie black	CLEAN UP THE TOXIC WASTE NOW you made clean up after it!!!
2242	Nelda Ikenberry	My son works there!!!
2243	Ron Putz	
2244	Rosemary Murray	
2245	Burton Steck	
2246	Daniel Freese	
2247	Bradley Zurweller	
2248	John Crisman	
2249	kurt miron	
2250	Robert Manning	
2251	melinda wheat	
2252	Jim Woodward	
2253	Virginia Wallace	
2254	Cecilia Brown	
2255	Karl Koessel	
2256	Robin Tierney	
2257	Judith Shipsky	
2258	Sandra L. Herndon	
2259	Greg Antonioli	
2260	Mark Creighton	
2261	Sue Bowser	
2262	Sifredo Martinez	PROTECT ALL AMERICANS - ADULTS AND CHILDREN.
2263	Marie Wakefield	
2264	madge rossinoff	
2265	Glen Venezia	
2266	Toni Clark	
2267	Guy Zahller	
2268	Christopher Alcorn	
2269	Diane Krell-Bates	
2270	yseu lt biwer	
2271	Marta Phillips	
2272	rick uhfir	
2273	Christine Marchi	
2274	Kesha Gross	
2275	Marc Smaison	
2276	Mary Stone	
2277	Donald Cheshire	
2278	Marjorie Streeter	
2279	Mark Soenksen	
2280	Sergio Ruano	
2281	Michael Milsuda	
2282	gary stuart	
2283	Melvin Bautista	
2284	clarence rosa	
2285	thomas odonnell	
2286	Patricia Alejandro	
2287	Robin Gorges	
2288	Sarah Caspar	You need more information to back up your claims. I believe you but you will need more to convince others.
2289	Jerome Roth	Can you have sampling done of ground water an air?? /and do you know what other toxins are buried there
2290	Jane Clemens	in addition to PCBs?
2291	William Gardner	
2292	Emily Brandt	
2293	Lynn Melso	
2294	Diane Burket	Greed is a terrible thing.
2295	James McGrath	
2296	Karen Boehler Karen Boehler	

Comment Number	Name	Comment
2297	Jennifer Heffinger	
2298	Ray Bellamy	
2299	Hannah Blakeman	
2300	Susan Attermeier	If you watch the video you shouldn't need more explanation
2301	Bonita Staas	
2302	Marianna Rydvald	The biggest enemy, is a giant called g r e e d. May all peoples be protected from these ruthless corporations and may p e a c e prevail on our beautiful planet earth.
2303	Dave Frey	
2304	Georgia Brewer	
2305	Donna Charter	
2306	John Nowosad	
2307	David Givers	
2308	Leslie Sweeney	
2309	Janna Caughron	
2310	David Sutter	
2311	Richard Faust	
2312	Don Lahti	STOP the POLLUTION NOW.
2313	William Schricker	
2314	Sybil Schlesinger	
2315	Daniel Jaffee	
2316	Marianne Hart	
2317	Mary A Borchers	
2318	Scott Species	
2319	Jo Phillips	To decrease toxic waste, stop using toxic substances. That is how we lived on Earth up until the past 70 years. We just made a wrong turn down "better living through chemistry" lane. Back up and stop soiling our nest.
2320	William Claiborn	
2321	Virginia Williams	
2322	Mark Luciano	
2323	John McCarthy	
2324	Robert Hall	
2325	Sampath Palaniswamy	
2326	David Wilson	
2327	David Moore	
2328	William Wright	
2329	Cleo Ernst	
2330	Maggie Rose	
2331	Ralph Tuscher	
2332	Denise Cameron	
2333	Linda Kay G Duron	Truly Sad !
2334	Mary Smith	
2335	Patricia Guevara	
2336	lauri fritsch	
2337	Scott Erickson	
2338	Cary Woodland	
2339	Wayne Slawson	
2340	Mary Garcia-Lemus	
2341	Robert Stephens	
2342	Laurie Mazza	
2343	Wendy Johnson-Niblick	
2344	Eliot Lerman	
2345	Viri Romero	
2346	Valli Williams	
2347	Rosemary Goudy	
2348	Preston w	
2349	Weida & ANDY Graybeal	
2350	tony barnert	
2351	Cathleen Rose	
2352	Dean Monroe	
2353	Enrico Gabuzzi	STOP THE KOCK BROTHERS !!!
2354	bev kelly, phd	
2355	Dr. F Taylor	
2356	Margaret C. McHugh	Who is responsible? Dept. of Health? Help!
2357	Janelle Chase	
2358	Lori Mulvey	
2359	Jeremy Evnchesky	
2360	Thomas Reynolds	
2361	Marguerite Winkel	
2362	Ron Collins	
2363	Mila Valenta	
2364	Michelle Ognjanovic	All these toxins are deliberate, debilitating to health, and externalized as costs that taxpayers are made to pick up. It's a cycle of corruption and the govt looks the other way.
2365	Carole Hemphill	

Comment Number	Name	Comment
2366	diane hart	clean air and water are basic human rights
2367	Jody Gibson	
2368	Bill Carpenter	
2369	Bradford Rogers	People before profits.
2370	Robert Helm	
2371	rebecca koo	
2372	Stephen Urbaniak	
2373	Siri Margerin	
2374	Diane Deutsch	
2375	Ronda Snider	
2376	Marina Jimenez	
2377	Sergio Rivera	
2378	Cynthia Silver	
2379	Kelley Scanlon	
2380	David Dahlstrom	As an expert in exposure sciences, hazardous waste management, and knowledgeable of Chemical Waste Management's practices and the Kettleman Hills waste site issues, I implore DTSC to take stronger steps in regulating this company and this facility. It is important to consider raising concerns over environmental justice abuses upon the surrounding populations in this location.
2381	Chris Kohn	
2382	David Schooley	
2383	Jim Gayden	
2384	Annette La Rosa	
2385	B Mickleburgh	
2386	Virginia Lippert	horrendous
2387	Scott Cady	
2388	Lenora Pentecost	
2389	Ayesha Gill	
2390	Ron McGill	
2391	Josephine Soublet	
2392	David B. Brooks	
2393	Jeri Burgdorf	
2394	Mark Lungo	
2395	Linda Mooney	
2396	Gordon Campbell	
2397	paul mcadam	Outrageous!
2398	Eric Meyer	
2399	James levolella	
2400	Marc Zarowin	
2401	Ann Remkus	Stop making war on the health of Americans who are not part of the 1 percent !
2402	Janice Stout	
2403	Randy Morrow	
2404	Michael Fair	
2405	Bill Murphy	Greedy Republican Scum!!
2406	Anjali Choksi	
2407	Bill Murphy	
2408	Adrienne Fong	
2409	Pat Kelly	
2410	Esther Buddenhagen	This is absolutely horrifying. I am ashamed.
2411	Scott Tanner	
2412	Patricia Zylius	
2413	Elaine Becker	Make polluters pay!
2414	Byron Byers	
2415	Angela Taylor	
2416	Ellen Henry	
2417	Mitchell Rekow	
2418	Cheryl Fisher	
2419	Claire Amanno	
2420	Thomas Westheimer	
2421	Deborah Sevy	
2422	John Peter McGrath	
2423	Clinton Anderson	
2424	Eugenia Bajorek	another example of BIG corporations not noticing or caring what happens to the little people or the environment!
2425	Joan Stone	
2426	Victoria Shorr	
2427	Megan Fincher	
2428	Douglas Johnson	The word control is in your department's name, but you seem out of control, or perhaps beholding to ... someone else with no moral scruples?
2429	Anthony Schmitt	
2430	Karen and Jeff Hay	
2431	Cheryl Nelsen	
2432	Victoria Trinko	

Comment Number	Name	Comment
2433	erica hawley	
2434	Larry Ulrey	
2435	David Scharf	
2436	Naomi Peck	
2437	william toner	
2438	Miriam Sexton	
2439	Sarah White	
2440	Jo Galatoire	
2441	John Hansen	Maybe WM CEO. will build his Home in one of the towns and show us how it won't hurt him.
2442	Edmund Light	
2443	Gary Sarppo	
2444	Douglas Cooke	
2445	Anthony Montapert	
2446	Jean West	
2447	Orion Bobo	
2448	Dawn Spencer	
2449	Ryan Bradley	
2450	George Vail	
2451	Peggy Heinrich	
2452	Lenore Sheridan	
2453	Rachel Herbener	
2454	Terri keppler	
2455	Myra Boime	
2456	Stephen Dutschke	
2457	Michael Molder	
2458	Peggy Cope	
2459	Karynn Merkel	
2460	sara Roderer	
2461	Patricia Amirsoleymani	
2462	Beatriz Urrea	
2463	Leovigildo Rodriguez	
2464	Richard Fullerton	
2465	Sarah de Sousa	
2466	Alice Green	
2467	Catherine Lampton	
2468	Adriana Martinez	
2469	Valerie Ralston	
2470	Jeannine Bressie	
2471	John Heyneman	
2472	Tom Roth	
2473	Ginger Carter	
2474	frank belcastro	
2475	Heidi Gitterman	
2476	Sara Brenner	
2477	Mary Hanselmann	
2478	Linda Musmeci Kimball	
2479	Therese Gall	
2480		
2481	Susan Roberts-Emery	
2482	Allan Smid	
2483	Frances Howard	
2484	Edwin Aiken	
2485	Emily Lindsey	
2486	Dan Meier	
2487	Edna Publicover	
2488	N C Rosas	
2489	Phyllis Miller	
2490	Donald Granchi	
2491	Tia Jai	
2492	Joseph Falkenstein	
2493	Rebecca Evans	
2494	Terri Fl	Please put people before profit!
2495	Victoria Stratton	
2496	Barbara Brack	
2497	Allan P. Butler	
2498	Robert Fritsch	
2499	robert Bugalla	
2500	Richard Vultaggio	
2501	Susan Walden	
2502	gillian callard	
2503	Mary Helen Stephens	
2504	Randi Nielsen	
2505	kari clarke	

2552

T0086-037 KETTLEMAN COMMENT

Laurie MacSween	Insupportable! ENOUGH!!!!!!!!!!!!!! Corporations are criminals!!!!!!
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Comment Number	Name	Comment
2506	Jose Bereicua	
2507	eric alabaster	
2508	Nona Weiner	
2509	Sheridan Sonne Rice	
2510	Danny Gore	
2511	Victoria Kaplan	Unacceptable.
2512	Lynn Romans	time is now for change
2513	Michael Dobbs	
2514	Martin Thistle	
2515	Elisabeth Price	
2516	Orne Montgomery	
2517	Wright E Harris III	
2518	Rita Falsetto	
2519	kathleen brown	
2520	Laura Gray	
2521	mark chapel	
2522	Mayra Chavez	
2523	Ian Boardman	
2524	Susanna Hyatt	
2525	William Hassig	
2526	Randal Jeter	
2527	Carrie Cole	
2528	Andrew Mumford	
2529	norma lightcap	it's a shame the people in power don't care about the rest of us.....this is why we NEED government.....but one with strong people.....who know right from wrong. And this dump is WRONG.
2530	Aki Okuno	
2531	Jim Crotty	
2532	Susan Teitelman	
2533	Wayne Harris	
2534	Sharon Levine	
2535	Ann Stevning-Roe	
2536	Victor Avera	
2537	Layne Horwitz	
2538	Sharon Fay	
2539	Eliza Duncan	
2540		
2541	Kate Skolnick	
2542	Edward G. Mrkvicka	
2543	Elaine Kalantarian	
2544	Janet Glover	
2545	Spencer Koffman	
2546	chris bey	
2547	Jorge I. Gomez	This BP disaster is stupidity and greed to the nth degree. According to the embedded media, it was reported that if BP had install a shut-off valve, a 500K cost, this tragedy would not have happened, ergo, they should be fined out of their greedy, miserable corrupted existence.
2548	drew fenton	
2549	john cevasco	
2550	J Droege	
2551	bret polish	
2552	laurie MacSween	Insupportable! YA BASTA!!!!!!!!!!!! Corporations son criminales!!!!!!!!
2553	Cat Neshine	
2554	Nancy Pieterson	
2555	Nayeem Aslam	
2556	Ron Schutte	
2557	Athena Batsios	
2558	Kathryn Mellon	
2559	Rae Leeth	
2560	Alex H	
2561	jeff hopkins	
2562	Howard Rouser	
2563	Phyllis Park	
2564	Adam Roberts	
2565	Joan Goddard	It should be cleaned up %00%00 not just left the same size (not expanded).
2566	Michael Treece	
2567	frances Ob	
2568	Mary Gregory	
2569	Steven Hebert	
2570	Sandra Zylberman	
2571	Joe Byers	
2572	Lorne Beatty	
2573	Arkadiy Medvedovskiy	
2574	Todd Hauser	Thank you for alerting me to this tragedy ... I will help you!

Comment Number	Name	Comment
2575	debra netkin	
2576	Jacqueline Johnson	This is criminal! Do NOT expand it--AND--CLEAN IT UP!
2577	William E. Sarovec	
2578	Roger Corpolongo	
2579	R.M. Lewis	
2580	john wotipka	
2581	Effie Osborne	
2582	Lisa Iannucci	
2583	Ronaye Tylor	
2584	Mary Ann Black	
2585	Marilyn Whitesides	
2586	Phyllis Chavez	
2587	Andreia Shotwell	
2588	Leslie Cassidy	
2589	Jason Brose	This is unconscionable. What are you thinking? The dump should be -closed-, not expanded. Putting this in the middle of a community of poor Campesinos makes it even more odious. Put the dump in the polluters' back yards instead, and see how they like it.
2590	Bryan Lilienkamp	
2591	Susan Weiner	
2592	Howard Christofersen,MD	Obvious that tighter controls are needed
2593	mary brinich	
2594	carol pritchett	
2595	Jose Alvarado	
2596	Joseph Nelson	
2597	Lana Touchstone	
2598	Joanie Laine	
2599	Joan Budd	
2600	Victoria Olson	
2601	Michelle McKenney	
2602	Wendy Fast	The cancer rates are already shockingly high. Why is the Dept. of Toxic Substances Control not doing something to stop this? Instead they are doing something to INCREASE the toxic substances!
2603	Rod House	
2604	J. Hart	
2605	Elizabeth Burr	
2606	Linda Kaehler	
2607	Dan Beam	
2608	James Pilewski	
2609		
2610	Gregg Sparkman	
2611	Nancy Snell	
2612	Gregory Lonam	
2613	(Ms.) Meryle A. Korn	
2614	Hiasaura Rubenstein	
2615	sheila winston	
2616	Jeffrey Lilly	Have you no shame?
2617	Marjorie Milroy	
2618	Joe Lieber	Another case of environmental racism! This must stop.
2619	Mel Templet	
2620	Ed Robertson	
2621	Richard DiMatteo	Reminds me Tom Lehrer-"Poisoning Pigeons in the Park".
2622	Rita Boone	
2623	Heather Gold	People in towns like this have no power to fight for their health concerns, expecting a Dept. of Toxic Substances Control to be fighting FOR them! This seems so terrible, it's hard to believe such inhumane attitudes by those in control of the lives and futures of people too poor and/or powerless to defend their community.
2624	Paul Servizio	
2625	Eric Dills	
2626	fred rinne	
2627	Bruce Hellemn	
2628	Louise Calabro	
2629	John Lind	
2630	Tamara King	
2631	James M Connors	
2632	Suzy Lawrence	
2633	Alan Nestlinger	
2634	Lynn Shoemaker	
2635	Marshall Deutsch	
2636	Malcolm Simpson	
2637	Gail Brown	
2638	Richard Pasichnyk	
2639	Mark Gubbels	
2640	robinson collins	no. just no. let the company producing the waste dump it in their own back yard.

Comment Number	Name	Comment
2641	Norman Daoust	
2642	Francis Dallaire	
2643	Elizabeth Co	
2644	Morgan Clark	
2645	Carol Pinson	
2646	Pat Ander	
2647	robert turner	
2648	Douglas Long	
2649	Tedd Ward, Jr.	
2650	Jacki Ruby	
2651	Joshua Seff	
2652	Terry Doran	what a county the light of the race is the fumes from garbage
2653	Winfield Schmitt	
2654	Esther Patton	
2655	Charles Carruthers	
2656	Robert Haslag	
2657	Barbara McElnea	
2658	Kayla Almazan	
2659	Lynne Treat	
2660	ordell vee	
2661	David L. Edwards, M.D.	
2662	Robert Narozanick	Respect the land
2663	Dan Perez	it's AMERICAN GREED
2664	Diana Munch	
2665	Judith Pearson	
2666		
2667	Caryn Brock	
2668	Wendy Diamond	
2669	Beatrix Perez	
2670	Gene Lawson	
2671	Jose Marquez	
2672	Laura Stell	As a registered nurse, I am committed to public health. Expanding this dump will have a negative impact on the health of the surrounding community, which has suffered already.
2673	Diana Alcantara	
2674	Michael Abrams	
2675	Robert Griffin	
2676	kathy linder	
2677	David Ibbotson	
2678	James Mahan	
2679	dan stabel	
2680	Mercedes Lackey	
2681	john jensen	Kettleman City and the terrible odor is a disgrace to our state, and conveniently right on I-5, the major N/S route. Most Californians who get out on the open road now and then know exactly where it is, by the smell. Maybe it was there before I-5? Surely we deserve better recycling than exists at Kettleman. john Jensen
2682	C.E. Sherrod	
2683	Jon Bazinet	
2684	Simon Holden	The environment does NOT belong to corporations or government - it belongs to the People and for this reason must be made as pristine and healthy as humanly possible. PUNISH companies that pollute and MAKE them fix it, not reward them with more permits to operate!!!
2685	Geoff Leavell	
2686	Arnie Schoenberg	
2687	Thomas McCallum	
2688	Joel P Dietz Jr	
2689	Nazanin Fard	
2690	Margery Coffey	
2691	Donna Lemongello	
2692	marios psomas	
2693	Don	
2694	Anthony Adamczyk	We cannot keep treating our planet like a bottomless trash bin.
2695	Lora Lehner	
2696	Ricki Brodie	
2697	Edward Iwanicki	
2698	Rashid Patch	
2699	Tika Bordelon	shameful.
2700	Greg Kosmi	
2701	Bonnie Hearststone	
2702	Barbara Griswold	
2703	Andrea Torres	
2704	Eileen McCorry	
2705	Robert Hasselbrink	
2706	Robert Boucher	
2707	Herminia Trejo	Stop killing babies!

Comment Number	Name	Comment
2708	Ricco Bonelli	
2709	Kathryn Burns	
2710	Leonard Tremmel	
2711	Robert Dimatteo	
2712	Tom Rossen	
2713	Curtis L. Hughes	
2714	Mary Ann Baier	
2715	Martha Saywell	
2716	Ronald Gelden	
2717	Gabriel Barragan	
2718	Jan Taylor	
2719	Sarah Apfel	
2720	Mike Anderson	
2721	Alexandra Graziano	
2722	Robert Aponte	
2723	Bradley Walker	
2724	Marianne Vesey	
2725	Jan Ryk	
2726	Russell Whitley	
2727	Judith Freese	
2728	Leo Ward	
2729	Debbie McCarthy	
2730	John Betak	
2731	Barbara Brandler	
2732	Patsy Lowe	
2733	Chester Stark	
2734	Daniel Nilsson	
2735	William Pritchard	
2736	Jacqueline Richey	It's time to find a new place to put toxic waste. Better yet: make the corporations find ways to produce less of it.
2737	Tom Cleary	
2738	Susan Hemmer	
2739	Travis Harvey	
2740	James Nugen	
2741	James Eaton	
2742	Ralph Dickar	We need to use less toxic ingredients in industry and to find better ways to neutralize and eliminate the wastes.
2743	Erik Schnabel	
2744	theresa kristal	
2745	Callie Rabe	
2746	Jonathan Young	This is outrageous and inhuman.
2747	Rosalind Milliken	
2748	Terry Reeves	
2749	Donna Heimlich	
2750	Robert Neuhauser	
2751	Susan Segalla	
2752	Darlene Sievert	
2753	Bonnie McMillan	
2754	Michael Garitty	
2755	Jeff Dean	
2756	John and Jean Fleming	
2757	David Trione	
2758	Alison C	
2759	Erica Meade	
2760	Eric Schwartz	
2761	Erin Gannon	
2762	Brenda Martin	
2763	James Baron	
2764	Charles L. Rojer, M.D.	I thought the government agency was there to "protect the people" not the polluters!
2765	Diana Morgan-Hickey	
2766	Michael Zuckerman	
2767	Barbara Schiffer	
2768	Lois Congdon	
2769	Dave Heilermann	
2770	Greg & Annie Harder	
2771	Robert Pancner	
2772	William Cox	
2773	Barbara Sherman	
2774		
2775	Susan Oakes	
2776	Terry Martin	
2777	Steve Menicucci	
2778	Kim Floyd	

Comment Number	Name	Comment	
2779	Susan Lefler		
2780	Paul Rosenfeld		
2781	Marina Skinner		
2782	Mark Scardello		
2783	Tom Moore		
2784	Eric Ranvig		
2785	Lloyd Downs		
2786	Cary Moy		
2787	Ronald Ratner		
2788	Rick Lambert		
2789	Carol Jean Thatcher		
2790	Avi & Clarence Klammer & Reese		
2791	Anita Morrison		
2792	Alli Jackson		
2793	Wayne Wathen		
2794	Chris Schaffner		
2795	Shauna Haines		
2796	maia peter		
2797	Jacki Kossik		
2798	Bill Jenkins		
2799	Karen Kite		
2800	Hannah Hall		
2801	Vicky Crampton		
2802	Stephen Pryputniewicz		
2803	Nina Diamante		
2804	Christine Croysdill	No company should be rewarded for harming the health of nearby residents. No expansion of such toxic materials should be allowed. In fact, I strongly believe that Waste Management should be shut down entirely, since they have failed to make any effort to comply with laws and safety regulations.	
2805	Joseph Rollins		
2806	Maureen O'Neal		
2807	Sheri ambrose		
2808	William Conroy		
2809	holly overin	You have failed in your duties to protect the public from toxic waste residues which enter the air, ground and water. Because of these examples, you should have your license revoked, unless it is a license to murder children. Do not expand your waste facility. Clean up the superfund site that you have created. No one is expendable even if they do not represent the millionaires and billionaires you have sold out to and for whom you exist. Ultimately you will be held accountable for the innocence you now work daily to destroy.	
2810	Lucas Klein		
2811	James Kendall		
2812	Val Maylone		
2813	Michael Luciano		
2814	Joe Weis		
2815	Craig James		
2816	Randall Dollins		
2817	Andrews Fortenberry		
2818	Kati Short		
2819	Franklin Kapustka		
2820	Karen DeMasters		
2821	Susan Selbin		
2822	Cory Rahmberg		
2823	Ann and Bill Schweers		
2824	April Plumeri		
2825	Barbara J Schell		
2826	Ricky Hernandez		WHITE SUPREMACY MUST END IN ORDER FOR HUMAN SUPREMACY TO BEGIN...
2827	Keith Cowan		
2828	Sherry Rieger		
2829	Edward F Styborski		
2830	Shamus Nicholson		
2831	Cheryl Dare		
2832	Larry Forrest		
2833	Frieda Brock		
2834	Graham Hubenthal		
2835	lucy oh		
2836	Jon Sturtevant		
2837	Ellen Koivisto		
2838	Dolores Darst		
2839	Fae Mansfield	When are people going to be more important than profit to big corporations? So sad.....	
2840	Katherin Balles		
2841	Rosemary Tann		
2842	Marsha Lowry		
2843	Mary Ann and FRank Graffagnino	PLEASE TAKE THE RIGHT, FAIR, JUST, HEALTHY AND HUMANE ACTION AS URGED IN THE PETITION.	

Comment Number	Name	Comment
2844	Manuel Perez	
2845	michael framson	Stop poisoning these innocent people. Time to bring in Erin Brockovich.
2846	Maryanne Roberts	
2847	Pat	
2848	steve zimmett	
2849		
2850	Martha Korman	
2851	Ina Martinez	
2852	irasema bautista	
2853	Henry Winckler	
2854	James Croteau	
2855	Virginia Hamori	
2856	John Armstrong	
2857	Alan Haggard	
2858	Robert Williams	
2859	tim jensen	
2860	peg wupperman	
2861	Suzanne Smith	
2862	Robert Cornwell	
2863	Marilyn Mason	
2864	Bernard del Valle	
2865	Stephen Eklund	
2866		
2867	Melissa McGuire-Maniau	
2868	Sandra Booth	
2869	Alice Gray	These people matter! We ALL matter! YOU can't pick and choose who will be priority over another! Stop playing god!
2870	neil shargel	
2871	Armon Yeghnazar	We rely on you for this kind of information since our media and news broadcasters prefer profit over people. Thank you for your honest report.
2872	barbara stec	"we are not inheriting the earth from our ancestors but borrowing it from our children" -Native American saying We all know it is true. We all know the dangers of toxic dumping. We all know the injustice we are doing to future generations. It is time to stop this grand denial and swallow our cowardice. I think that most of us are ready to change for the betterment of humankind and the earth we share. Are you?
2873	june zand	
2874	Seren Bradshaw	
2875	Patricia Deller	
2876	Titania Kumeh	
2877	stephen brklycica	
2878	Mimi Jennings	We all share this planet. This is home. There's no "Planet B."
2879	Steve Trammell	
2880	Cheryl Dzubak	I think this is a sin that is happening and this dump must be stopped from expanding.
2881	Susan Ozawa	
2882	Peter Reynolds	
2883	Laurence Yorgason	
2884	Laurie Price	
2885	melvin zimmerman	
2886	Jan Baidenweck	
2887	John Bradfield	
2888	trish kolk	Stop poisoning our world
2889	Christina Fong	
2890	Laurie Robertson-Lorant	How can corporations be so evil?????
2891	Joan MacDonald	
2892	Jonathan Vallejo	
2893	Mary Lohmiller	
2894	Deborah Ebersold	
2895	Helen Woolf	
2896	Bonnie Rowe	
2897	Monica Gilman	
2898	Cade Bryant	
2899	Gayle Janzen	Please stop dumping toxic waste right next to a town where the toxins are killing people. Do unto others! This is an outrage and must be stopped, not expanded.
2900	Merlyn Heyman	
2901	Frances Paz	
2902	Kym Waugh	
2903	Ace Hull	
2904	Randall Lee	
2905	Soli Alpert	
2906	Dorothy Washington	
2907	Meredith McCown	Don't let them double the size! CLOSE IT!

Comment Number	Name	Comment
2908	arnold roman	
2909	S Jahangeer	
2910	Per Fagereng	
2911	John Estes	
2912	Sarina Amato	
2913	Marie Mason	DTSC must be stopped on this path of being friendly with polluters instead of watching out for the public they were set up to protect.
2914	Stephanie Trasoff	
2915	Frances Shure	
2916	Robert Gray	
2917	Doug Ballard	
2918	Randi Johnson	
2919	Sam Aley	
2920	Shirley Armand	
2921	Joanie Fritz Zosike	Dumping on the poor. How toxic is that!
2922	Dorene Schutz	
2923	Patty Bonney	
2924	Celia F	
2925	Milan Zeman	Please think of these good people and their children.
2926	Frank Hill	Stop poisoning people.
2927	John Stockhausen	Dumping poison anywhere people should be Banned & anyone violating his should be fined & jailed
2928	Amy Carpenter	
2929	Ned Quistorff	
2930	Nick Jury	These types of atrocities are happening all the time, all over the country and around the world. It's these monstrous global corporations that could care less about the casualties, the environmental destruction, devious methods used to prey on poor, defenseless people. It's all about wealth and power, and whatever it takes to obtain that wealth is considered "fair game" to accomplish their objectives. To them government is just a tool to use as needed in order to protect their interests and their methods. Nick Jury
2931	Ken Montsinger	
2932	Joan Brannigan	
2933	Sheilaa Hite	
2934	Frank Ackerman	Stop the greedy, corrupt corporations.
2935	Anne Olivares	This is shameful!
2936	William Cross	
2937		
2938	nancy harlander	
2939	Russell Smith	
2940	Anita Watkins	
2941	Tsee Lee	
2942	Ernestine Alexander	
2943	Vicki Pauly	
2944	John H Browne	The idea that, once a place has been stuck with this bad stuff it's easier to consolidate than find a better, &/or more logical place is Pure bureaucratic laziness! If you have poisoned people nearby as a result of your permissive actions, you'd better DO SOMETHING Right for those who are bearing the adverse brunt of your actions. Find another place; and prepare it better than you did Here. ^..^
2945	James Button	
2946	Kelly Cashman	
2947	Jay Sherwood	
2948	Charles Feathers	
2949	Barbara Maier	
2950	Dan Horan	
2951	Linda Myers	
2952	Kristopher Toma-Lee	
2953	Barbara Consbruck	
2954	Peggy Salas	
2955	Lizzie de Rham	
2956	Terry Horowitz	
2957	Bob Gorringer	
2958	mark pittman	
2959	Joe Carrera	
2960	Vickie Harwood	
2961	Walter Kindred	
2962	Gayathri Ramanathan	
2963	Dennis Smith	
2964	Garry Cobbum	
2965	Charles Gould	
2966	Lori Lujan	
2967	Cigy Cyriac	
2968	Edie Bruce	

Comment Number	Name	Comment
2969	Dale Johnson	
2970	Susan Grimm	
2971	Robert Terrill	
2972	John Clikeman	Would you let your kids drink the water there?
2973	Christina Campbell	Don't expose people to more toxins.
2974	Barry Ergang	
2975	Nancy Braun	
2976	John Mowell	
2977	Edward Gould	
2978	John D. Bennett	
2979	Felicite Strohbeh	
2980	william brackett	
2981	elaine Brouwer	
2982	Linda Maher	
2983	David Geist	
2984	elizabeth forrest	
2985	Alex Kulcsar	
2986	Pk Doyle	
2987	Paxton Robinson	
2988		
2989	Stephen Ekholm	
2990	Patricia Orlinski	This kind of mistreatment of the poor and people of color is wrong.
2991	Lynn Lee	
2992	Steven Gaylord	
2993	David Lawhon	
2994	alvaro garza	
2995	natalia marchan	
2996	Harriet Belkin	
2997	K T	
2998	Liz Neff	
2999	Johnnie Corrie	
3000	cathy murck	
3001	Steve Ditore	Your time is coming, Waste Management. All you can do is postpone the inevitable, with more people suffering as you lie and weasel your way around the environmental laws you've broken.
3002	Janie Lyle	
3003	Donna Dearborn	
3004	Susan Balthasar	
3005	Robert Brown	This sounds very depressing. Let's clean up Kettleman City!
3006	William L. & Frances D. Surbrook	
3007	Jason Steadmon	
3008		toxic waste kills, please stop it now
3009	Lupe Garcia	
3010	Ai McCarthy	
3011	Abigail Bates	
3012	Daniel Wolf	
3013	Wendy Scott	
3014	timothy diko	
3015	James-Michael Scott	
3016	Colin Blattel	
3017	Rosemary Graham-Gardner	Keep your shit in your own backyard, not on poor people's land!
3018	Scott Korman	
3019	Margaret Jeune	
3020	Ellen Rifkin	
3021	anne veraldi	
3022	Rene Gelsomino	
3023	Barbara Ulman	Toxic waste must not endanger the people nearby. Stop this expansion of the dump; instead, CLEAN IT UP!
3024	Betty Gorman	I can't believe they would even consider expanding it.....
3025	Brad J	
3026	Leslie Young Young	
3027	Michael Eichenholtz	
3028	Donna Fabiano	
3029	Bobbette Axelrod	
3030	Richard Waldo	
3031	Susan Harman	
3032	Perry Johnson	
3033	Theresa Corrigan	Not only should the site not be expanded, it needs to be cleaned up. We need to stop poisoning people.
3034	tim musial	
3035	Kathleen Beymer	
3036	Edwin McCready	stop the pollution!
3037	D Kessler	

Comment Number	Name	Comment
3038	Judie Hoepfner	
3039	Corey Bitterman	
3040	Lillian Wilder	
3041	Gary LaMaster	
3042	Michelle Peterson	
3043	Keith Hall	
3044	Myrna Santiago	
3045	Joan Peterson	
3046	Jenni Stepp	
3047	Elizabeth Hunter	
3048		
3049	Stephan Livingstone	
3050	Curtis Keedy	
3051	Scott Coahran	
3052	Elise Kelsheimer	
3053	Amy Fields	
3054	Jack Sewvello	
3055	A. Obermeier	
3056	Laura Larue	
3057	Dk Bolen	
3058	Jeanette Davis	
3059	Dorothy A Smith	
3060	Michael Evans	
3061	jessica aldridge	
3062	GlendaRae Hernandez	Such callous disregard for the lives of people and especially children
3063	Andrew Dobbs-Kramer	deserves the greatest consequence that can be given for such blatant disregard for human beings.
3064	Cindy Piccolo	
3065	Barbara Oceanlight	
3066	John Jones	Would you approve this expansion if it was adjacent to where your family lives??? Where is your humanity? Treat all people as though they are your family because they ARE!!! For years I have driven past this ominous site and wondered what was there that somebody doesn't want us to know about. Now I know and I will be watching.
3067	Susan McLean	
3068	Mark Choi	
3069	Gordana Leonard	
3070	Margaret Fisher	
3071	Tom Vanni	
3072	mary crandles	stop dumping toxic substances in Kettleman City. It is destroying life by increasing childhood cancer, miscarriages, and birth defects
3073		
3074	Alice McGough	
3075	GB Carey	
3076	Linda MacKay	The community of Kettleman City has been suffering for too long and there needs to be an end to dumping sooo much toxic waste next to this small town. The people of Kettleman matter as much as anyone anywhere matter! Please do not approve an expansion of the dump. The people need some relief. Enough.
3077	Sharyn St Clair	
3078	Linda Lillow	
3079	Ioseba Amatriain Losa	
3080	Art Hanson	
3081	Ellen Epstein	
3082	Jack Spectoe	
3083	Brendan Banerdt	
3084	Lise Snyder	
3085	keith ozbun	horrible move the dump to Republican neighborhood !!
3086	Red Lion York	
3087	Helena Weeks	
3088	Rick McConnell	
3089	Oscar Revilla Alguacil	
3090	Fritz Miehl	
3091	Celeste Hong	
3092	Georgia Kahn	
3093	Russ Duncan sr	
3094	Michael Iverson	
3095	Mike Farrell	
3096	Vickie Fouts	Do what is right for WE THE PEOPLE, not uncaring corporations and the rich who own & run them.
3097	robert weinstock	
3098	James Madden	
3099	Tom Brown	
3100	Jonathan Winfield	
3101	Karen Burman	
3102	James Brunkow	

Comment Number	Name	Comment
3103	judith brown	
3104	Wayne Morse	
3105	Constance Glenn	
3106	Herbert Escher	
3107	Connie Colina	
3108	Nicholas Rulli	
3109	Jean Goetinck	Unconscionable!
3110	Twyla Meyer	
3111	john s.	
3112	Evert Adams	There are proper procedures for the disposal of toxic waste. Dumping them is not one of them. Those doing the dumping ought to be find to such an extent that they can no longer stay in business
3113	Mark Beckwith	
3114	Theodore Voth III	
3115	Cher Gilmore	
3116	Kristine Andarmani	
3117	Laura Overmann	
3118	Forest Frasier	
3119	Nicole Taylor	
3120	Edward Dijeau	Toxic waste should not be dumped in the Agricultural reagon of the West. We should not be poisoning our own food and those who havest it for us.
3121	ronald maxson	
3122	John Halladay	
3123	Gregory Hill	Shameful. The people who run and allow this kind of thing to happen should be held accountable.
3124	Michael Martin	
3125	a.l. steiner	
3126	Tracy Mott	
3127	Thomas Brown	
3128	Mallika Henry	
3129	Victoria Estrella	
3130	John Raplinger	
3131	Andrew Lee	
3132	Thomas Tizard	
3133	Lyle Collins	
3134	Kathleen O'Nan	This dump should be phased out, not expanded. Dumps do not belong in our agricultural areas!
3135	Linda Moorman	
3136	Christina Ticas	
3137	Edward Dziadowicz	
3138	Waifan Chan	
3139	Jill Smith	
3140	Kenton Barnes	
3141	Christopher Dowling	
3142	Barbara Bennigson	
3143	Alan Thomas	
3144	Wayne Johnson	
3145	Terry Bromm	Put this dump[in beverly hills. This dump is already contributing to shockingly high rates of childhood cancer, birth defects and miscarriages in Kettleman County. Allowing an expansion is irresponsible.
3146	Edith Borie	
3147	Amy Perrin	
3148	Abraham Omorenimwen Oboruemuh	
3149	Marilda Matos	There are other ways to get rid of waste, this isn't one of them.
3150	Bette Koetz	
3151	Glenn Bristol	
3152	Mike Schorn	
3153	Marian Bauman	
3154	Peter Lee	
3155	Mary Warner	
3156	Jan-Paul Alon	
3157	francis mastri	
3158	Jennifer Shaw	
3159	William Ground	
3160	Peg Futrell	
3161	Gordon Michaels	
3162	jayne lello	
3163	Lorrie Altman-Michaels	
3164	Leon Fiftal	
3165	Lisa Yarger	
3166	Shawn Sargent	
3167	John Miller	
3168	Paul Moss	
3169	Vesta Shapiro	Please don't allow this.
3170	Gay Trachsel	

Comment Number	Name	Comment
3171	Allison Ragner	
3172	Kathleen Fellbaum	
3173	ronda cooperstein	
3174	reggie young	
3175	Tracy Kunstmann	
3176	Laila Atallah	
3177	Phil Young	
3178	Georgeanne Matranga	
3179	janet cooke	These negative effects MUST be reversed before an expansion.
3180	Nan Scott	
3181	Mark Casazza	
3182	stephanie proctor	
3183	Carole Mark	Need a more systemic solution to this. This is a national problem!
3184	Joseph Powell	
3185	Steven Gage	
3186	Wayne Renardson	
3187	Glenn Kramer	
3188	Marlana Shears	
3189	Kimberly Shaub	
3190	Vanda Giberson	
3191	Dennis Ledden	
3192	David Arbitr	Our economy is apparently ruining our future, to wit, our kids lives
3193	Joan Brannon	
3194	John Mansky	
3195	Gerald Frock	
3196	Sally Hirshberg	Shameful but not surprising!
3197	Mark Lukens	
3198	Linda Hipsher	
3199	Michael Toobert	
3200	James Bengel	
3201	Betty Walters	
3202	Tiana Bradley	
3203	Don Patton	
3204	charles hill	
3205	Jim Sisk	
3206	Lorraine Petrie	
3207	John Simpatico	
3208	Celsa Rodriguez	
3209	Gordon Brown	
3210	Ana Ciereszko	
3211	Karen Robbins	
3212	Sherry Andrews	
3213	Lawrence Jackson-Rosen	
3214	Marc H Lavietes	
3215	sean manchester	
3216	carol costello	
3217	Oriana Sanchez	
3218	mike steinmann	Keep it clean! We all have to breathe the same air, drink from the same aquifers.
3219	Tom Bryson	
3220	Deb Moon	It breaks my heart that Waste Management values corporate profits over humans - especially children.
3221	Lee Baker	
3222	Sissy Farenthold	
3223	Dorothy Wolking	
3224	Carole Plourde	This toxic dump should be cleaned up and closed. Why is it that some of our children's lives are considered expendable and others are protected from this type of environmental disaster. Farm workers children, black children, poor children always bear the brunt of environmental racism and elitism. My son has had testicular cancer and my daughter asthma and they didn't grow up next to a toxic waste dump and it was hard on them and on us and we are middle class. To dump this type of burden on families who are barely get by is wrong and lacking in respect for their humanity.
3225	Mary Duda	This is horrible and outrageous!
3226	Darryl Brasseale	
3227	Hessel Flach	
3228	oscar lopez	
3229	Rochelle Carothers	
3230	Mark Donaldson	
3231	Winfield Huteton	I live in Seattle (6059 Redwing St.), WA 98118
3232	Larri Richmond	
3233	Diane Carroll	
3234	Augie Gonzalez	

Comment Number	Name	Comment
3235	Bob	
3236	Carol Mannarino	
3237	Gloria Koller	
3238	Barbara Griffin	
3239	Karen Moody	
3240	James Berge	
3241	Karen Spradlin	
3242	Kelley Anderson	
3243	Gregory Bushur	
3244	A. Rubi	To whom it may concern: Dumping toxic substances on a town or people is not the right of the Agri industry! Stop the expansion of this toxic waste!
3245		
3246	Marjorie Crockett	
3247	Stephen Greenfield	
3248	Joel Eizenstat	
3249	dorothy perez	
3250	Amy Biggs	
3251	steven hoffman	
3252	Peter Sirois	We have a WM facility in the next town. I will watch them more closely.
3253	Baron Davis	
3254	Karl Rove	Right On
3255	Eric Lewis	
3256	kelly chavez	
3257	Delaine Spilsbury	
3258	Lewis Patrie	
3259	Agusti Serra	
3260	Karl Wilson	
3261	Lori Girshick	
3262	Howard Goldstein	
3263	gail canzano	
3264	Shirley Reusch	
3265	greg wolf	
3266	John Zalusky	
3267	Mark Lundholm	
3268	howard mock	
3269	David Sabata	
3270	Kristina Turechek	
3271	Mauricio Mayora	
3272	J. Steinberg	
3273	Rafael Zambrana	All the data gathered regarding the chemical misuse and effects on the population, should be centralized and disseminated throughout all the communities living of and around these facilities, in order to warn and boycott them. A pattern of how these facilities are affecting people's lives should be outlined for people to easily see it and be convinced NOT to work there and either kick them out or move away from them.
3274	Susan Getty	
3275	Don Bay	
3276	michael mcquerry	
3277	Derek Nankivil	
3278	Dana Smith	
3279	Barbara Silverstein	
3280	Philip Nehrt	
3281	James Rauner	
3282	John McCraw	
3283	Joseph Hoagland	
3284	Rael Nidess	Have been following the Kettleman issue for years... it's a tragedy & a disgrace!
3285	Edward Landels	
3286	Aida Sheets	
3287	Don Peterson	
3288	Dennis Jones	
3289	Patrick Jordan	
3290	Mary White	
3291	Amie King	
3292	Jon Krueger	While clarity is needed re: why is there no mention in the video there is nothing else which could be causing the health issues raised, the request, if true, does not go far enough. It ought to include retroactive cleanup and determination why there are health troubles from the old dump - not just preventing an addition to it.
3293	Vicki McClure	
3294	Margaret Hollenbach	
3295	Karen Gollis	
3296	Steven Kostis	

Comment Number	Name	Comment
3297	robert nobrega	
3298	Art Hunkins	
3299	Agnes A Matenos	
3300	Debra Gehring	Find better ways to dispose of this toxic waste, they are available!
3301	mardi hanson	
3302	Grace Morsberger	
3303	Chelo Ludden	
3304	Norman Moore	
3305	Alexander Kruedener	Protect the public, stop taking graft from corporations.
3306	crisobal lopez	
3307	Michael O'Neill	
3308	Elizabeth MacKelvie	
3309	Reg Smith	There should be a law that requires companies that create these toxins to have the responsibility to clean up after themselves. The folks creating the toxic waste ought to be required to live where it's dumped; that would guarantee their toxic mess would be cleaned up. Afterall, it's not THEIR children paying such a horrible price in support of their profits!
3310	Arthur Lane	
3311	Janis Brodie	
3312	James J Stewart	Is this Bengladesh or America? Corporate mass-murder for profit has made us a turd world nation.
3313	Jacque Zimmermann	How is this still happening - this is internatiional haunting.
3314	Don Bolanos	
3315	Jennifer Lyons	
3316	Maureen Ackerman	
3317	Bob Brister	
3318	Jamila Garrecht	
3319	Jim Sylva	
3320	Mila Pilz	
3321	don kelly	
3322	Cleo Kocol	
3323	Tim Lippert	
3324	Stephen Oviatt	
3325	Terry Tedesco-Kerrick	
3326	Linda Greene	
3327	Ken O'Connell	
3328	grady stewart	
3329	Arturo Alvarez	
3330	Benita Campbell	This is the inhumane result of vast inequality where the way-too-much haves corrupt government and infect the culture with insane ideas about deregulation and their perverted ideas of freedom. Of course, they even have money left over to first charm the residents and then later use psyops on them. For example, they give them food and t-shirts early on in the PR campaigns against regulations, but later they'll use their vast access to media to label anybody who stands up to them as "insurgents" and "terrorists." Funny how Teapublicans are so afraid of the government when it regulates big biz with the results of a more livable environment. But Teapublicans have no problem when money interests buy up politicians and together, in public-private collaboration, crush American citizens. I don't care how much another American or anybody else has, but when they organize huge amounts of capital to pervert democracy and kill other people, then obviously they have way too much money.
3331	Alexis Mazl_n	
3332	Bernadine Carpenter	
3333	Vic Bostock	
3334		
3335	Gerry Pirritano	
3336	Kathleen Bentley	
3337	Mark Barkan	Remember when Lake Erie burned? Remember when the Love Canal emptied the surrounding communities? Toxic waste sites are dangerous for anything that lives. Don't allow any to expand! Stop making toxic chemicals!
3338	Loretta Paraguassu	
3339	James Skalsky	
3340	otto Palmer	
3341	Charles Glaser	
3342	Erma Edwards	
3343	Christine Child	
3344	Dr. Steven F. and Mary C. Jennings	
3345	Dan Howard	
3346	Erica Ramos	
3347	Kevin O'Leary	
3348	Sharon Schulz-Elsing	
3349	Milton Wallin	
3350	carlos nunez	
3351	Ida Newsom	
3352	Daniel Heilborn	
3353	Robert Becker	

Comment Number	Name	Comment
3354	jeff costello	
3355	Gale Bauman	
3356	Roger Britton	
3357	Irene Mertz	
3358	Ellen Garza	
3359	Camille Ellis-Vickers	
3360	Tim McDowell	
3361	Pedro Giraud	
3362	Jennie Bloom	
3363	Andres Pacheco	
3364	Donald Walker	
3365	gerald chovnick	
3366	Fritz Hudnut	
3367	Bill Weston	
3368	Sara Farneth	
3369	marcy vaj	
3370	Fred Keen	
3371	John Kinney	
3372	Jayne Hamilton	
3373	Steve Whitacre	They need to find out where the executives in that facility live
3374	Daniel Hunt	
3375	jerry miller	
3376	alice ross	
3377	Karl Wiegand	
3378	Don Hill	
3379	Shawn Abrahamson	
3380	James Moreno	
3381	Sheila Daniels	
3382	Richard Comar	
3383	Dia Smith Redman	
3384	charles and ruth schultz	
3385	Ann George	
3386	David Weiner	
3387	James Scarabin	
3388	Joyce Frohn	
3389	Patricia Scully	
3390	Norman Crouter	
3391	Gerald Smith	
3392	Julia Albertin	
3393	Michael Gilbert	This why Republicans are against regulation! So their corporate paymasters can cheaply dispose toxic waste in communities of low incomes and influence! If I'm wrong then show me a toxic waste site in a wealthy community!!!
3394	Rosalee Cabrera	Stop this atrocity!!!! People of color should not have to bare the burden of waste control.
3395	Rosalee Cabrera	Stop this atrocity!!!! People of color should not have to bare the burden of waste control.
3396	Bo Baggs	
3397	Renee Greene	Full investigation (by independent experts) needed.
3398	Neil Olson	
3399	nacho jaramillo	
3400	Heather Franklin	
3401	Linda Tomei	
3402	Colleen Romanelli	
3403	Rosie Morgan	
3404	Kevin McCoy	Dear madame and sirs; how can you allow the expansion of a toxic waste dump so close to neighborhoods?
3405	Jim Byrd	This needs to STOP! It is very obvious that WM is responsible and their current way to handle it's waste is ineffective. How can you consider expanding a facility that has demonstrated it is ineffective? Laws are to protect the victims not the perpetrators! It's crap officials like these that gives government a bad name!
3406	Ron Hamilton	
3407	stewart neish	
3408	L. Kiselich	
3409	Daniel Gallacher	Un acceptable.....if this facility was near Sonoma or any affluent California community there would be immediate action.
3410	Caroline TheissAird	
3411	Robert Wm Smith	This tragedy is far too common. With the "no blame" attitude of the American legal system, this type of human sacrifice will increase..
3412	Lanlan Hoo	
3413	John Frey	
3414	Jonathan Pugh	
3415	andrea stevens	
3416	Anna Pier	
3417	gustavo velazquez	

Comment Number	Name	Comment
		It just doesn't sound like expansion of a waste site that endangers the health of the surrounding community is appropriate. It seems more appropriate to investigate operations and correct the problems that lead to the contamination of the community. There are clearly problems in the methods of storage, processing and disposal.
3418	Lou McCroskey	
3419	Valerie & Eric j	
3420	Jane Chischilly	
3421	Richard Sandoval	
3422	Anita Schroeder	
3423	Rick Browne	
3424	Faith Santillana	
3425	Jennifer Ciabrone	
3426	Deborah Baverstock	My brother lives not to far from here, so even though I am not a California resident I am signing this. This dumping is horrible for people and bad for the environment as a whole. It needs to stop, not expand.
3427	Donna Carter	
3428	Dr. & Mrs. George B. Kauffman	
3429	Abigail Patridge	
3430	stephen mcdonald	
3431	Katie Myers	
3432	patricia harp	
3433	Maria McConnell	
3434	Jacques Zakin	
3435	Sarah Friedberg	
3436	Mark Deakins	
3437	Darcie Aukeman	
3438	Cynthia Pratt	
3439	fran?oise sanchez	
3440	Elizabeth Cross	
3441	wallis nell	
3442	Edmund Cord	
3443	Chris Wordlaw	
3444	Anne Kaeser	
3445	Cecelia Lewis	
3446	Judy J	
3447	jeff condit	
3448	Sonia Santana	Please stop the expansion of this toxic dump. Stop maiming and harming the nearby residents and children who deserve a healthy life.
3449	Andrew Marotta	
3450	Helen Parker	
3451	Norm Cegelnik	
3452	Patricia Wilson	
3453	Eric Edwards	
3454	Katrin Olafsson	
3455	Helen Yeomans	
3456	Jennifer Scott	
3457	Geoffrey Kooris	
3458	Avra Leigh	
3459	Luis Guzman	
3460	Suzan Still	Deeply distressing when the children must bear the burden of a culture out of balance.
3461	Catherine Adams	
3462	lynda longshore	
3463	Thomas Bengaff	
3464	Efren Beltran	
3465	Luis Rauld	
3466	Joseph Jeffers	
3467	Nicole D. Bilotti	
3468	Eric Hamilton	
3469	Gia Ibarra	
3470	Sharon Routledge	This is unconscionable. All for a few dollars because the rest of the country doesn't want to take responsibility for the results of their actions. FOR SHAME! FOR SHAME! FOR SHAME!
3471	Kristen Wheelis Eksouzian	
3472	Paul S	
3473	Milton Bosch, M.D.	
3474	Renee Morehouse	
3475	Jonathan Nash	
3476	bev weidner	
3477	Karen De Wolfe	
3478	Patricia D'Ambrosio	
3479	Michael Bruflat	Shame on the State of California and WM.....criminal !!!!
3480	Klaus Dr. Germann	
3481	Myrna Freeman	
3482	Bob Applegate	
3483	Mary Anne Traylor	

Comment Number	Name	Comment
3484	Colin Smith	
3485	L.G. Markham	
3486	c. lee	
3487	Leonardo Baquero	
3488	Brenda Godsey	
3489	Cathy Bacquet	
3490	Richard Rheder	
3491	margie ghiz-gillies	
3492	Megan Krout	
3493	George Stl_hli	
3494	Judy Burris	
3495	Joan Stone	
3496	Teri Jernigan	
3497	Judith Patalidis	
3498	William Bauder	
3499	Kassandra Nevarez	
3500	harbhajan dhillon	
3501	Leslie Scales Hernandez	You mean people LIVE there?!
3502	kristine rosst�ad	
3503	Katrina Ontiveros	
3504	james HOEHNjr	
3505	Donna Shumaker	
3506	Sudha Upadhyay	
3507	Jens Hansen	
3508	Robin Reddell	
3509	Linda Brebner	I think this is deplorable. It is eco-racism.
3510	Ollie Steates	
3511	Eunice Van Handel	
3512	Susan Lentell	
3513	Tonya Andreaacchio	
3514	Devorah Zehring	Outrageous that this is occurring in California. Please do not expand. Thank you, Devorah Zehring
3515	r k	
3516	Myrna Castaline	
3517	Pam Sorrell	
3518	WILLIAM STANYER	
3519	Jackie Jones	
3520	Geoff Morgan	
3521	SAMantha LOFTIN	
3522	Lina Carrascal	
3523	Robert Mitchell	This reminds of the, of how the Native America Indians. Land was stolen. Major corporations, need to take more responsibility. There is should be new ways to break down toxic waste. Even if, by same means. They dismantle chemical weapons.
3524	Carolyn Lilly	
3525	Linda Hayes	
3526	Anne Hemingway-Feuer	
3527	Cynthia Raha	
3528	Daryl Gale	
3529	michael grady	
3530	Tania Schalburg-Dykes	
3531	Tristan Hanson	
3532	Patrick McIntosh	There's no excusable reason for treating people like medieval serfs.
3533	Dorothy Miller	
3534		Can't believe this is happening in our country. Have you no conscience??!!
3535	Monica Dalberg	
3536	constance garrett	how unconscienable of WM
3537	Jenna Wilcox	
3538	Jennifer Hale-Gallardo	
3539	Dana Lubow	
3540	Peter Phwan	
3541	Zenaida Perez F.	stop killing babies!
3542	Timothy Aquilina	
3543	Millicent Frehner	
3544	Cristina Leyva	Stop now
3545		
3546	Peter	
3547	Lee Evans	
3548	Harry Newman	
3549	Laura Williams	I will also pray for each and every person in Kettleman.
3550	Hector Martinez	

Comment Number	Name	Comment
3551	Frank J. Thomeczek	
3552	jan kline	I don't think the government should allow this expansion to happen, given the amount of birth defects and deaths that happen in this city. Give the people the answers they need as to why their children are dying needlessly.
3553	Hannah Tomes	
3554	Joseph Patrick Quinn	Folks: This ain't right; please grow a conscience. Sincerely, Joseph Patrick Quinn
3555	Lucia Gonzalez	
3556	rhoda seidler	Outrageous!
3557	Bruce C. Dubey	
3558	Ryan Hilles	
3559	Colleen Hagenbruch	
3560	Rachel Simpson-Loizou	
3561	Jeri Dulitz-Altman	
3562	peter colin lippman	
3563	Pattie Meade	
3564	Dimitri Ashling	
3565	Barbara Powers	It is only the raised voices of the public that will get the message across. No government entity or elected politicians will vouch for the public, only the money that dances the dog. What is happening throughout with these wastelands is simply obscene.
3566	Valmira Meshaj	
3567	Leanne Friedman	
3568	christian Limon	Please have some compassion for these people.
3569	Joan Horn	
3570	John R Poole	
3571	Andrea Eftim	
3572	Ashley Hudson	
3573	DIANE MEDINA	
3574	Fredric Salstrom	
3575	Martha Pino	
3576	ramon verhoeven	
3577	Keely Hill	
3578	Sheila Balter	
3579	JASON DERCOLA	
3580	charles pierson	
3581	penny luborskywechsler	
3582	Terry Sherven	
3583	Saab Lofton	
3584	karl meller	It is no accident that toxic waste dumps or facilities are placed in poor and rminority areas.
3585	kyle frydendal	this is deplorable
3586	James Thomas	
3587	Phillip Banks	
3588	Miland Suman	The eyes Of the world watch in shame. Shame on you America for letting this happen!
3589	Emma O'Driscoll	
3590	judith schleicher	
3591	Rick St. John	
3592	C Corazzoli	
3593	Ralph Shannon	
3594	Judy Whitehouse	
3595	cristina sanguinetti	
3596	Stephanie Kinghorn	
3597	Andrea Delgado	
3598	Cinthya Ruiz	
3599	allan gleerup	What a great place to work at! The old dtsc ! They need to find better ways to do this, so what if it costs more, how about 2 to 300 lawsuits!! How much will that cost!
3600	james keats	
3601	Carole Biang	
3602	Elizabeth Palma	
3603	Linda Zabielski	
3604	Margaret Trethewey	
3605	Lucy Duff	
3606	Jennifer Lake	
3607	JoVon Pierce	
3608	Rachel Kowals Dym	
3609	Linda Bruton	
3610	Alexandra Beabout	Have some respect for life
3611	Lynn Feinerman	ALL poisons must be stopped, and the companies who manufacture them... that includes Dow, Dupont, Monsanto, etc. etc. etc.
3612	noah smith-rowe	

Comment Number	Name	Comment
3613	mitzie wheeler	
3614	Faith Raymond	
3615	Rae Irwin	
3616	Richard Osborn	No poison.
3617	Letty Zuniga	
3618	Linda Dartt	
3619	Elana Mayer	
3620	Pako ford	California led the world--- Now, it's a disgrace.....
3621	kip smithrobinson	
3622	Jv Stills	
3623	kAa Sciborsky	
3624	Ronni Blumenthal	Rather than increasing the toxic load on this community, please explore
3625	Susannah Norris	
3626	Marissa Picone	
3627	David Gold	
3628	Marion Ladbrook	
3629	Rusty Gaidzik	
3630	Stephen Couche	
3631	Tonya Mitchell	
3632	betty brown	put the dump in Beverly Hills
3633	Linda Warrick	
3634	mark novotny	
3635	Natalie Blasco	Time to treat others as you'd like to be treated.
3636	Jake Allen	This is absolutely unnecessary.
3637	Roberta Vandehey	
3638	Dennis Deal	
3639	Steven Klabak	
3640	Michael Brewer	
3641	Linda Rubiano	STOP ENVIRONMENTAL DEGRADATION IN AMERICA! WE ONLY HAVE ONE PLANET.
3642	Suzanne Wilson	
3643	ernest lee	
3644	Oscar Tollast	
3645	Rucha Harde	
3646	ruth valdez	Try putting the hazardous waste in Beverly Hills.
3647	Hector Garcia	
3648	Barbara Sena	
3649	Joe Woo Jr.	
3650	Fabian Alecio	Stop killing innocent kids just for the money. Killers dress as angels? I don't think so
3651	Hannah Spencer	
3652	Angelina Mendoza	
3653	Christina Espada	
3654	Zane Evans	
3655	William Leight	
3656	Angela Cobian	
3657	Ned Flaherty	put the trash with the people that profit from it, dump the waste on Wall Street, or somewhere in Orange County, CA
3658	john edstrom	better yet, don't create toxins that can't/won't be rendered inert
3659	Frank Riccio	
3660	daniel stetzel	
3661	James Padgett	
3662	Jamie Clark	
3663	Alexander Clark	
3664	Mary Tennon	
3665	Hartson Doak	
3666	Gudelia Amigon	
3667	Shinehah Bigham	
3668	beth hernandez-jason	
3669	arnold schwertman	
3670	Jack Andriese	
3671	Robert Mammon	
3672	Deborah Naujokas	
3673	Nancy Shanley	
3674	Robert Parks	It's tragic when those whose role is to protect consumers serve the needs of those corporate interests instead. Have the integrity and the balls to do your job and stand up to pressure from big money!
3675	Paul Ezust	
3676	frances gould	
3677	Jen Schneider	
3678	Jo Ann & Alan Riley	
3679	Claudia Vasquez	

Comment Number	Name	Comment
3680	Andrea Inselmann	
3681	Flory Tran	
3682	Dixie Lopez	This raping of communities because they are populated with low income and minority populace. Enough already!!
3683	Gabriela Anderson	
3684	Patricia Davis	
3685	Matthew Jerauld	
3686	Melanie Thornton	A favorite tactic of big corporations is to dump on the least influential groups in society, this is no accident, it is intentional. Shame, shame, shame!
3687	Jeff Stookey	
3688	John Bowling	Treat the corrupt officials with the results of their corruption!
3689	Jessica Perez	
3690		As we move forward with the changes of an environmentally global conscientious society corporations need to be held accountable for their actions.
3691	chaun miller	
3692	Christine Aleman	WOW!
3693	Jim Madonna	
3694	Melissa Morales	
3695	Mariela Dieguez	
3696	James Cooper	
3697	Rick Glatz	
3698	Geri Silva	murder with impunity, plain, simple and pervasive. Where are the prisons for these corporations. There is no amount of punishment harsh enough for their CEO's
3699	Enide DeFreitas	
3700	G Allen Daily	
3701	ellen collier	
3702	Craig Peariso	
3703	Patricia Stuart	
3704	Ruth Peterson	
3705	Matthew krawczun	
3706	Vincent Patti	Put People over (corporate) Profits. People over Profits. People over profits. People over profits.
3707	Richard and Carolyn Rosenstein	
3708	Teresa Rolstad	
3709	devon maness	
3710	Lois Robin	
3711	Leslie Kozeluh	
3712	FRank Raguso	
3713	Seth Morgan	
3714	johanna martinez	
3715	Michelle Plain	
3716	Sylvia Rolfs	Really...polluting to the point where children die is acceptable? I don't think so. How do you live with yourself?
3717	Naomi McCann	
3718	Laura Adams	
3719	Robin Lesley	
3720	John Schmittauer	
3721	Iu morrissey	
3722	Kathleen White	Stop this horrible toxic waste dumping right now! this is reprehensible, to dump garbage full of toxic waste on the poor, and minorities is wrong. Stop the murder, for that is what it is.
3723	Diana Lovejoy	
3724	Er-Ti Chen	
3725	John Werndorfer	
3726	ANTONIO ORTIZ	
3727	Gwendolyn Zaxus	
3728	Tina Vivio	
3729	Teri Rubenstein	
3730	Laura Mota	
3731	Linda Livingston	why is the agency that should be protecting people, siding with the polluter?
3732	Janice Palesch	
3733	Wayne Lee	
3734	Jeslxs Acosta-Hughes	
3735	Jack Hill	
3736	theodore Arriaga	Governor Brown, Congress and the Attorney General need to require the Department of Toxic Substances Control to take immediate action requiring the company to take immediate action and prevent the company from expanding this toxic waste dump.
3737	Liliana Trujillo	
3738	susan schorin	
3739	Kendall Hamrick	
3740	Don Waller	Take the waste to your back yard instead of the innocent victims that you are poisoning.
3741	Christine Sullivan	If you don't take immediate action, the blood of these innocent children is on your hands. God help you.
3742	Michelle Mondragon	
3743	Julie Nadeau	

Comment Number	Name	Comment
3744	Marcy Gustafson	
3745	Avi Muller	
3746	Francisco Carmona	We can't keep doing this to our future, so that someone can make a fast buck!
3747	Oleh Sydor	
3748	Dave Macki	
3749	carolyn chew	
3750	Elizabeth Haney	
3751	Michael Ferris	
3752	Victoria Raya	
3753	Laura Corr	
3754	Cher La Freniere	
3755	Steve Sugarman	
3756	Louise Simone	
3757	Barbara Allen	Waste Management has no right to turn communities into hazardous waste dumps. There must be a safer way found to deal with this problem. Death in the name of jobs is so wrong. Every entity who uses a hazardous substance should be paying a tax at the cash register to help with this problem--people and corporations, all of us. Buy weed killer--pay federal tax. Buy a can of spray paint--pay federal tax. It can be done and should be done. Buy a chemical for your business--pay federal tax.
3758	Janie Macfarland	
3759	Robert Lopez	
3760	Edward Sharp	
3761	Rafael Uerdaz	If all as they say, have them come up with a second site proposal in a Anglo area with the same mix. All companies have a B or second backup proposal, what is their proposal?
3762	William Anness	In my opinion, WMI is only interested in the money making aspect of this venture. If it kills or maims a bunch of people, well too bad!
3763	jeanne serrano	FOR EVERY MEMBER OF CONGRESS WHO IS OKAY WITH DUMPING TOXINS OR FRACKED WATER, PUBLICLY DECLARING IT "SAFE" - THEY MUST HAVE A TRUCKLOAD OF THESE 'SAFE' TOXINS DUMPED IN THEIR OWN FAMILY'S BACK YARDS -AND- FORCE THE ENTIRE FAMILY (OF THE SO-CALLED "REPRESENTATIVE" OF WE-THE-PEOPLE) TO DRINK FRACKED WATER INSTEAD OF THE WATER COMING OUT OF THEIR OWN CITY WATER TAP AND MONITORED TO MAKE SURE NO BOTTLED WATER COMES INTO THEIR HOMES BY TAKING AWAY THEIR PRIVACY TO FORCE THEM TO LIVE BY THEIR OWN POLICY-MAKING UNTIL THEY CHANGE THEIR MINDS AND LEGISLATE ACCORDINGLY.
3764	Jackie Fezell	We need to stop producing toxic waste instead of expanding facilities for it.
3765	William Romero	
3766	Thomas Lichtenstein	
3767	john sikes	
3768	Frieda Stahl	
3769	Hada Rosales	
3770	Gisela Ruelas	
3771	Karen Nowlan	
3772	Elena Thorpe	
3773	Paul Rosen	
3774	Linda Marie	
3775	Cecelia Schneider	This is disgusting and it must be stopped right now. Shame on the Department of Toxic Waste and Waste Management. It is always the poor and innocent who suffer due to the Corporate dishonesty and the Government enabling of these monsters. To hire a Latino to go into this town and reassure these people that this is safe and to give them little trinkets and treats reminds me of the way the American Indians were treated in the 1800's. You disgust me!
3776	Gregory Bonzo	
3777	Lee Michalsky	
3778	wilton dillon	The toxic waste site should be closed, not expanded.
3779	robert kennedy	
3780	Maria Frias	
3781	Elizabeth Frazier	
3782	Joe Hernandez	
3783		
3784	ashley krolkowski	
3785	Barbara Carver	
3786	Melissa Gamez	
3787	Linville Doan	
3788	fred sugar	
3789	Rey Mambo	
3790	Lucy Gibson	
3791	Lorin Beatty	
3792	Kelly Wurzer	
3793	John Nettleton	
3794	pauly vachal	Where there are big profits to be made, the health of the general population takes a back seat. Just like here, where they want to send coal and oil trains through town. They never mention the toxic chemicals and the illness that results, only jobs! The corporations don't care about people, somebody dies too bad. There are always people to take their place.
3795	Alan Brooks	
3796	William Rainey	

Comment Number	Name	Comment
3797	Meeghan Gideon	
3798	Peter Gottemoller	
3799	Tina Burnat	
3800	Nell Grubbs	
3801	christina solano	
3802	Jeff Padawer	
3803	Roseanna Lavia	Sinful !
3804	Kari Curtis	
3805	Beverly McGuffin	
3806	Lu Plauzoles	
3807	Eduardo Huesca	this community deserves to live safely without being exposed to this waste. This is environmental racism.
3808	Eduardo Huesca	this community deserves to live safely without being exposed to this waste. This is environmental racism. I find that a government organization that is supposed to protect people, doing the opposite, to be entirely morally reprehensible. The unfortunate thing is, is that in many areas, the only disposal services available in their area is Waste Management.
3809	Janet Edwards	
3810	Bob Marsh	
3811	Juan C Lopez	There's a solution don't give up!!!
3812	Christina Navarro	
3813	Katherine Atwater	
3814	Carol Rosheck	This is an absolute abomination and has got to be the most immoral and unethical thing I've seen in a long time. Why are the lives of those in poverty worth less than anyone else's? This is a blatant attempt to kill people and getting the government to approve it!! Horrible!! Instead, the town should sue the living daylights out of WM and the State of California for crimes against humanity!!
3815	Joseph Muniz	Would a class action lawsuit be appropriate for this community?
3816	Trevor Ycas	
3817	Katherine Curtis	
3818	Neil Brown	
3819	ric garcia	
3820	roger schmidt	THIS IS A CRIME! AND THOSE THAT LET THIS HAPPEN ARE TO BLAME AND SHOULD BE CHARGED WITH THE DEATHS!
3821	David Rasmussen	
3822	Carolyn Doty	Apparently, no lesson learned from PG&E and Erin Brockivitch. Our people are NOT EXPENDABLE. This is not the only place this happens and there has to be a better way of getting rid of what we have and NOT making more of it. If you haven't read history, try reading why ROME FELL. Not listening to it's people. Government was to HELP not HINDER it's people. Don't help and things will change. Greed won't win in the end.
3823	Carolyn Doty	
3824	John Pritchard	
3825	Phil Merriam	
3826	sonia hauser	
3827	jaimedodaro	
3828	Cresencia Cruz	
3829	Kristine Smith	Disgraceful!
3830	Laura Hagenbarth	
3831	William Johnson	Stop dumping this waste and clean it up.
3832	John Raboin	god bless those families that have and will pay the price for this crime against humanity!
3833	Dallas Synnott	
3834	Jeff Gammill	
3835	Nicole Leite	
3836	kitty spaulding	
3837	Penelope Mazza	
3838	Corey Fischer	
3839	Juliette Cowall	
3840	bill montgomery	
3841	Diane Barber	
3842	Lucas Pfaff	
3843	Patrick O'Brien	This is pure and simple racism and classicism. Outrageous. WM should know better.
3844	Jon Longworth	
3845	Dannel Albert	I hate to think how much worse things will get with the government shutdown going on right now...
3846	Elvin Legros	
3847	Debra Rees	
3848	katy polony	
3849	Susan Brody	
3850	Susan Golightly	
3851	Yusbith Murillo	
3852	Sam Meier	
3853	denise young	
3854	Shoshana Wechsler	
3855	Melissa Jenkins	

Comment Number	Name	Comment
3856	Denise Campos	STOP Kettleman Hills Facility
3857	Karen Lin	
3858	Rebecca Shirley	
3859	Jenny Sowell	We are not disposable people - The poorest communities are always getting the worst deals. We should protect them.
3860	sharon hayes	
3861	Martha Muntzel	
3862	Kathleen Anderson	
3863		
3864	John R Williams	
3865	Lawrence Spatz	
3866	AutoFill Pamela glassoff	
3867	Eric Parker	
3868	Doris Katzen	
3869	Jeani Bantam	
3870	David Van	
3871	Terri Spurr	
3872	Richard MacDonald	
3873	Dimitry De Cock	
3874	Nora R. Enyart	This is criminal and heartless.
3875	suzanne schaem	
3876	Tracey Crack	
3877	Dan Freeman	If we don't stand up for ourselves no one will. Look at how our government and, our supposed, representatives have been bought by the very businesses that are killing us.
3878	Ruth Yurchuck	
3879	Cathy Dormann	
3880	Helene Eastwood	
3881	Lisa Pelletier	
3882	Elisa Yvette Becerra	What a shame. The residents of Kettleman have a right to live in a toxic free environment.
3883	Sylvia Garza	
3884	Akbar Rizvi	
3885	Brenda Clunn	Hope that DTSC rep is drinking from a local water source.
3886	Mandy Marcuccilli	
3887	Zenen Jaimes Perez	
3888	Michelle Flynn	
3889	Howard Moore	
3890	Timothy Martin	
3891	Mario Arseneault	
3892	Mary Martin	
3893	P.J. Frederick	For God's sake! It's 2013. Are we ever going to be able to have a sustainable, humane, honest government that serves the people instead of its corporate masters? Money corrupts. I am so sick and tired of the filthy rich beating down, starving, killing and lying to the rest of us. I fear it will never change. The rich get richer by sucking the life blood out of the rest of us. They like it that way and the system is set up to serve them.
3894	Francisco Velez	
3895	Andrew Pilling	
3896	J. Huston	No!
3897	Melinda Ross	Find a better, safer place and don't expand the dump!
3898	Richard Kurz	
3899	Laura Winick	
3900	Alfred Hogan	
3901	Pete Monreal	
3902	Jan Modjeski	
3903	Vaughn Baker	
3904	Laurence Taylor	Clean up Kettleman City and Stop screwing around. Force PG&E TO CLEAN UP THIS CRAP
3905	John Fernandez	
3906	Mary Bennett	
3907	Nancy Petranto	
3908	Lindsay Christenseer	Dear Department of Toxic Substance Control-- There's this organ that every body on this planet owns, called a heart. Google it. There's a living, breathing organism that we were born intertwined with, all around us. It's called the planet earth. Google it. Your hearts may be cracked, dry, seeping infectious ooze, but don't before it's too late, don't let it suck the life out of everything and everyone around you. Much Love. Lindsay Jade Christensen One of the most blatant instances of environmental racism I've ever heard of.
3909	Beth Enson	
3910	Jessica Walton	
3911	Marielle Intveld	
3912	amber lombardi	
3913	Patricia Swick	

Comment Number	Name	Comment
3914	Virginia Ramirez	
3915	Lynne Turpie	
3916	sashay simpson	
3917	Victoria De goff and family	
3918	Jeremy Umpleby	
3919	Sara McCay	
3920	Neil Cardew-Fanning	
3921	Charles McNally	
3922	Faith Gagne	Toxic dump sites in people's neighborhoods are absolutely horrible and should never ever be allowed. Where are the officials in this? Why are these companies allowed to do this and why are they not banned from this country?
3923	Lauren Jones	
3924	Maria Bustamante	
3925	ROSE MARTIN	
3926	mark & susan glasser	
3927	Janice Mastin-Kamps	
3928	Amanda Frazier	
3929	Kate Eisenberg	I grew up in a toxic wasteland and at age 33 was diagnosed with acute myeloid leukemia. The EPA and Super Fund Clean Up was designed to make sure old messes were cleaned up and new ones never begun. It is as if Love Canal, etc. never happened. Disgusting!
3930	Ruth Killough-Hill	
3931	Helen Parker-Lande	
3932	Shelley Nelson Pechous	The idea that WM is so egregiously dismissive of the damage being done to the residents surrounding their waste plant is quite horrific. WM is also the company that serves the area that I live in and it gives me great pause to think about what lack of oversight and failure to notify this community is WM capable of if they are that willing to sacrifice the lives of so many in Kettleman City, CA?
3933	Scott Grinthal	
3934	Eric Wilson	
3935	Florence Gilchrist	
3936	William Gotz	
3937	mike smith	
3938	Stacey Feeley	
3939	Robin Boeke	
3940	Andres Soto	DTSC, do your job! Protect the people not the corporations.
3941	Gordon Parker III	
3942	Greg Halbert	
3943	Robin Justice	
3944	Edith Martin	
3945	Julie Brown	
3946	Sraddha Durand	
3947	Courtenay Barber	
3948	Mary Levy	Horribly sad situation, which I know is an understatement!!!! Something should be done about this!!!!
3949	Bryon Ruelas	STOP poisoning California.
3950	C Parsons	Stop
3951	Colleen Devine	
3952	Louise Moriarty	It will come soon when all those responsible for heinous crimes against the environment will be held accountable. As we become aware of our responsibility to consume with an understanding of our consumer pollution footprint, our habits will change the trail of waste.
3953	Jeremy Martin	
3954	judy Ericson	
3955	Martha W D Bushnell	People must be living and their schools must at least a mile from this site.
3956	Craig Phipps	
3957	Karin Virehn	
3958	Cynthia Bell	
3959	Ed Caryter	
3960	Bob Sipe	
3961	cece gannon	
3962	Rose Bertrand	
3963	Cynthia B	
3964	Evelyn Montez	
3965	Hervl© Glon	
3966	Ted Jakubanis	
3967	Anita Wessling	DO YOUR JOB! PROTECT THE PUBLIC, NOT POLLUTERS!
3968	Deborah de Santos	If you wouldn't have it in your own backyard, don't allow others to be subjected to it.
3969	Jaclyn Kimball	
3970	Toni Garmon	YOU WORK FOR US....NOT BIG CORP.....REMEMBER ???? SHAME ON YOU

Comment Number	Name	Comment	
3971	stuart walker	THIS IS INSANE, a society that has no clue how to live on a LIVING PLANET. LETS VOTE EVERYONE OUT OF OFFICE UNTIL WE HAVE COMPASSIONATE HUMANS DIRECTING LOVING NURTURING WAYS FOR ALL LIVING THINGS. All toxins have to be shut down and contained properly, PERIOD!	
3972	Michelle Pavcovich		
3973	Jim Stephens		
3974	Janet Shifflet		
3975	Kathryn Schmidt		
3976	Marian Carter		
3977	Tessa Scott		
3978	kathy mayes		
3979	Jackie Gabriel		
3980	Joshua Maizel		
3981	Kurt Schaefer		
3982	Hina Imtiaz		DON'T DO IT, DEPARTMENT OF TOXIC SUBSTANCES CONTROL!
3983	Jody Smith		
3984	Ladonna Harris		
3985	Jan Cook		
3986	Janet Peach		
3987	Marilyn Lilly		
3988	Shelby Rogers		
3989	Barbara Barnett		
3990	Laure Richter		
3991	felipe zamora		
3992	Art Nanna	This shouldn't happen to anyone, let alone dumping it off on the most vulnerable among us.	
3993	Paul Franzmann		
3994	Terri Baker	30 years ago, Cesar Chavez warned us against these polluters who spawn cancer in our midst and merely shrug their shoulders They think this is the price of " progress" We must oppose this Horrific health threat! Please help. Thank you	
3995	donaldo gomez		
3996	Evren Sonmez		
3997	tom mcphillips		
3998	Lee Ann Greaves		
3999	Deborah Hartz	it's about time we stop buying the toxic waste. When we throw things away... they don't go away, it just goes some place else. Responsibility of Free Will. I know those people just won't listen...so lets you and I start NOW...ok... NOW	
4000	Nancy Thelot		
4001	Yao-Chieh Cheng		
4002	Jeanne Davis	These townspeople are human beings, not disposables.	
4003	Michael Ott		
4004	Fain Zimmerman	It is so hard for me to believe that this is happening in the USA today. What has become of our morals and empathy with all beings?	
4005	Michael Gomel		
4006	Kurt Shaffer		
4007	Gail Smallridge		
4008	Samantha Grissom		
4009	Chris Levine		
4010	Franz Settels		
4011	Melodi Coulson	WM, you've recreated all of the pollution dangers and social neglect of a 3rd world country. Shame on you. Let's put a boarding school there and y'all send you kids to live there.	
4012	Marcos Palacios		
4013	Jeanne Sofia		
4014	gaile carr		
4015	John Curtis		
4016	H. Michael McQuown		
4017	Janita Boulton		
4018	Richard Cesa		Corporate greed. Go after them!
4019	Mickie Flanigan		
4020	Rosalind Bresnahan		It is disgraceful that poor and minority people are written off by those who unsafely dispose of toxic materials.
4021	Sarah Hetzer		
4022	Alexandra Gruskos		
4023	Santa Stauffacher		
4024	Laura Garcia		
4025	Bob Leichner		
4026	C Foglietta		
4027	Robert Hodge		
4028	Jean Tepperman		
4029	Rudolph Benda		
4030	Fletcher Hutchins		
4031	Maryanna Foscett		
4032	Marjorie Woodruff		
4033	Liz Keen		

Comment Number	Name	Comment
4034	Aggie Monfette	
4035	Joseph Levy	
4036	Andrew Anderson	
4037	Sara Marsh	
4038		
4039	Steve Dustcircle	
4040	Susan Johnston	
4041	George Livesley	
4042	Denise Flanders	
4043	Diane Martin	
4044	martha beach	
4045	Sue Geurkink	
4046	april Barcenas	
4047	H Dare	
4048	Joanna Kozanecka	
4049	Damian Reyes	this is DISGRACEFUL!!! We need Erin Brockovich!!!
4050	Gabriella Favarato	
4051	Judith Parker	NO MORE DUMPING HERE NOW!!!! no more toxic substances!! stop poisoning humans, animals, the Earth!!
4052	Josh De Pasquale	NO MORE DUMPING ON FARM LAND ESPECIALLY!!!! this is crazy!!!!
4053	Janice Dlugosz	
4054	nicholas mosunic	
4055	Derek Stephen McPhail	though I live in Canada, I too was a victim from contact with toxic heavy metal poisoning; which, gave me Hepatitis C and osteoarthritis. fortunately, I've had naturopathic treatments that have cured me; despite, the horrible drugs I received originally from a major liver clinic, that had numerous side-effects and just didn't work. my hospital doctors still deny there was any connection between my illness and the heavy metal poisoning; despite my paying for blood tests that proved the existence of high quantities of lead, mercury & thalium. they also refuse to recognize the effectiveness of the naturopathic treatments.
4056	Gerard Braun	This wreckless way of acting by Chem Waste MISmanagement is as bad an criminal as a SERIAL KILLER !! A display of pathological parasite behaviour !!
4057	Margaret Morrison	
4058	Tabitha Maya	
4059	Karyna Linzer	
4060	Amelia Rodriguez	This is terrible!
4061	Andy Lupenko	
4062	Ana Torres	
4063	Katrina Sandigo	
4064	Tim Collingwood	Low-income, let alone Latino, does not mean that life is expendable. Stop using this community of people as a dumping ground for hazardous waste.
4065	Christopher Jenner	
4066	Yajaira Sanchez	
4067	Mary Kizis	Ou country is better than this, at least it used to be
4068	Ana Lopez	
4069	Tom Lemieux	Stop dumping toxic wastes on minority towns!!!
4070	Keli Espitia	
4071	MaryAnne Muller	
4072	Elijah Hammond	People are always more important than profit!
4073	Beatriz Zavala	
4074	Fred Mallery	
4075	Safia Alif	Anything to help.
4076	Danielle Bastien	I was born and raised in California and feel strongly that this waste dump should not be expanded. Furthermore, Waste Management should be held accountable to reporting spills from their sites and for the health effects on residents near waste sites.
4077	donat ntigoheka	
4078	Prudence Brooks	FOR SHAME! SHAME BE UPON YOU PIGS WHO WOULD CRUCIFY THE UNBORN AND THE NEWLY ARRIVED PEOPLE, LET ALONE ANIMALS AND THE WILD NATURE THAT I AM CERTAIN YOU DO NOT CARE ANYTHING ABOUT. CEASE AND DESIST! TAKE THIS CRAP AND RESPONSIBLY RECYCLE IT.
4079	Curtis Miller	
4080	Stuart Schiffman	
4081	Stuart and Bonnie Shaw	
4082	Gail Jothan	
4083	Chery Esau	This is horrible!!!!!!!!!!!!
4084	Irma Mondragon	
4085	Azi Carrero	
4086	Patti Johnson	
4087	Sofia Pavlova	
4088	miguel Iiriano	
4089	Lisa Enlow	
4090	silvia pena	
4091	Lauren Murdock	
4092	Dennis Ruffer	
4093	Verona Murray	

Comment Number	Name	Comment
4094	Idalia Cerna	
4095	Martin Mundo	Build these waste sites away from people! Very sad that these kinds of things are still happening.
4096	Robin Mackey	
4097	Beth Sweetwater	
4098	Eduardo Prado	
4099	Brian Back	How can you allow these people ...these children to suffer & die? Go away.. All industries that generate waste must be held responsible for clean up and compensation for adverse consequences
4100	Brian T. Manning	
4101	Charles Griffin	
4102	Celeste Howard	
4103	Steven Garland	WM should not be killing children
4104	Susan Allen	
4105	Susan Allen	
4106	Barbara Suruga	
4107	Ashley Dickinson	
4108	Elise Phillips	Though I am an entire country away, I find the potential expansion of the waste management facility to be completely appalling. To pretend that there is no connection between the height rate of birth abnormalities and high levels of toxic contamination in the area is blatant disregard for human life. The corporate piggy banks profiting from the suffering of others should be ashamed.
4109	Erica Salazar	
4110	rita wright	
4111	Christopher Hargis	
4112	Vonnie Sisauyhoat	
4113	Tracy Hughes	Why are we (California) allowing this? Federal dollars means more than human life? Disgusting. There is no safe way of disposing of toxic chemicals. Their manufacture and release from the earth must be stopped now. Clean up must be begun in earnest worldwide and the closest thing we can get to environmental justice--because there is no adequate payback for this stuff--must be done. There's integrity, and there's corruption. This is unthinkable.
4114	Michelle Gale	
4115	LingChen Chou	
4116	Tracy Scanlon	People think this only happens in other countries,it doesn't happen in America anymore,think again.
4117	Mr @ Mrs R N Huff	
4118	Sarah Grisham	
4119	Margie Goulden	
4120	Jennifer Gates	
4121	Marina Lopez	
4122	K L	
4123	Margaret Welmer	
4124	Carla Tevelow	
4125	Luis Sarellano	
4126	Edward Nizalowski	We are all one.
4127	Anne Sherwood	
4128	Matthew Wiskow	
4129		
4130	Roberta Ryan	
4131	eveandree laramee	
4132	Donna Allen	Perhaps the Department of Toxic Substances Control staff should be forced to live in Kettleman City.
4133	Cynthia Montgomery	
4134	steve chung	
4135	David Kaufman	
4136	Stacey Rougvie	
4137	Gloria Umana	
4138	Omar Rivera	
4139	Christine Fougrousse	
4140	Patricia Federico	
4141	Christine B. Hayes	
4142	James Tevis	
4143	Amber McDaniel	
4144	Beverly Jahn	
4145	Peter Xenoulis	The corporate pyramid gangs dumping there toxic filth on lower socio economic neighborhoods. sounds like a familiar pattern around the world. Would be great if everyone turns on them, if they did they would lose all there power.
4146	Jan Deihl	
4147	Maria Gomez	Please hear the cries of mothers and affected children!
4148	philip alcala	
4149	Lynn Marie Smith	They need to clean their mess up and find alternatives! Human life needs to be valued.....not toxic wasted!
4150	babette bruton	
4151		
4152	Rosalind Shierman	
4153	Tim Gaub	

Comment Number	Name	Comment
4154	Cassi Kirk	
4155	Tammy Woods	
4156	Zachary Bennett	
4157	Syed Hasan	
4158	Yasmin Rubayo	
4159	Daisy Vega	
4160	Steve Spieckerman	
4161	Erica Lalak	
4162	Eleazar Almazan	
4163	Christopher O'Brien	
4164	Jennifer Armstrong	
4165	Ann Ewing	
4166	Terri Anderson	
4167	Marnie Cotton	
4168	Edgar Serrato	
4169	Anne del Prado	You have the power to make companies diminish their waste or not. Just remember, also outside of your church, that Jesus said, All that you have done to the least of my people you have done to me. Stop blaming the Romans and Pontius Pilate, you are nailing Jesus on the cross.
4170	Susanna Martin	
4171	York Quillen	
4172	Mercy Betancourth	
4173	bruce bell	More and more the agencies that are in place to protect us are being paid off or made powerless by lobbyist forcing their agendas during voting or elections. It needs to stop, no more turning a blind eye toward the health issues caused by toxic waste in this town
4174	mike gill	Just another huge corporation that has bought its way into our "government for the people".
4175	peter hemp	tell the EPA to do it's job and protect ALL of us
4176	Carmen Capo-Lugo	
4177	Sharon Crocker	
4178	Trevor Whitbread	
4179	Anne Corrigan	
4180	Cynthia OByrne	
4181	Maureen Perron	WE should be decommissioning this site and eliminating the toxic waste, not adding to it.
4182	Terry Young	
4183	Monica May	
4184	Ioana Gheorghiu	
4185	Mara Williams	
4186	Henry Peters	
4187	Jesse Granger	
4188	susan nevers	
4189	Marjorie Yoder	
4190	Michelle Yamamoto	
4191	Sharla Chittick	
4192	Carlos Perez	Shameful
4193	Faith Rivers	
4194	Michelle Newman	
4195	Beth Smith	
4196	Luis Argueta	
4197	Gina Wahl	
4198	Beverly Janowitz-Price	
4199	Juliana Choi	
4200	Daniel Dance	
4201	Glen Miller	This expose is phoney. Almost every "cancer center" has been proven false or coincidental - no cause and effect. What part of your town would you like to see developed to dispose of toxic waste? Fear mongers are only looking for personal power or financial gain. Oh sure, and how do you propose, in detail, eliminating toxic waste? There's lots of effort already made to eliminate waste and it should be encouraged.
4202	Rosalie Malik	
4203	John M Romero	This is clearly the State of California's problem to be solved, and the WM company is the problem. This will not get any better without the State of California's intervention and it must be immediate and forceful... Lives are at stake and due to GREED, by the WM company, it is likely to be covered up and treated as a minor problem...unless the people, with our support, stand up and force appropriate action to be taken... an open investigation and shutting down of the facility until all is concluded and resolved!!
4204	Phil Konigsberg	
4205	James Hansen	We stayed one night in Kettleman City and the water in the motel was toxic smelling and was not drinkable or even suitable for bathing!
4206	Julie Evans	You need to get in touch with Erin Brockovich, she may be able to help the people of Kettleman City. Google her name to locate her.
4207	Miss Crystal J Boles	
4208	Charlotte Mosher	
4209	Bill Clark	

Comment Number	Name	Comment
4210	Desiree Kinghorn	
4211	Ryan Hanson	
4212	Tony Bell	
4213	Terry Arndt	
4214	Lyall Kerr	
4215	Rachel Lockwood	
4216	Michelle Nickelson	
4217	Barbara Grothus	
4218	Isabelle Skiba	
4219	Kali Martin	
4220	dhyan sandhya	
4221	Amber Haley	
4222	April Kay	
4223	richard stotts	
4224		
4225	Laurie Fisher	
4226	Laurie Fisher	
4227	Arnaud Kiers	
4228	Bev Derouard	
4229	Debra Murphy	
4230	William Allman	
4231	Anthony Iacono	
4232	Sam Jampetro	heartbreaking. My prayers go with you.
4233	KRIENA POVODEN VUČKO	
4234	Debra Garceau	
4235	laura atkinson	this is disgusting
4236	Melinda Rivera	
4237	Seth Silverman	
4238	Matthew Iskra	
4239	Jon Knipp	
4240	Abigail Connell	
4241	Marty Brown	
4242	Abigai. Buitenkant	
4243	John Kesich	A better world is possible, but not while some are more equal.
4244	Lucille Grooms	
4245	ilea pick	
4246	Dave Matthews	
4247	Vince Mendieta	
4248		
4249	Amber Schadenfroh	
4250	Lana Kosina	
4251	Julie Taylor	
4252	Peter Cervantes-Gautschi	
4253	L. Griffiths	
4254	Littlebird Parks	
4255	Robert Kraft	I've always heard that human beings are the only animals that will willfully foul their own "nest". This is a perfect example to prove that belief.
4256	Audra Ovist	
4257	Burmansah Burmansah	
4258	Barbara Eakins	
4259	Tara Murray	
		I know it is hard what Kettleman City is going through, may God keep giving you strength courage to his people to fight the bad that is taking over. WM you will not win!!!
4260	Stephanie Williams	
4261	Claudia Almazan	
4262	Charles Repsher	People must be protected from the horrible chemicals.
4263	William Bucy	
4264	Cathrina Skov	
4265	Sharon Davison	Poisons should be w/the people who made them.
4266	mouawad daher	
4267	Lisa Adams	
4268	Lee Scoville	The callousness of this is mind blowing. For shame!
4269	Christine Rodgers	
4270	Alice Joyce	
4271	Teresa Dingus	
4272	John Moszyk	
4273	Christian Oscategui	
4274	Anthony Lopez	
4275	Claudia Walker	
4276	Brayden Criswell	
4277	David Jackson	

Comment Number	Name	Comment
4278	Edwina Smith	
4279	Kasia Malz	
4280	Clare Ritchie	
4281	Jim Macke	
4282	Francisco Ramirez	
4283	Mary Dean	
4284	Karin Stork-Whitson	
4285	Rachael Clifford	
4286	Joshua Bastian	
4287	Luz Prieto	
4288	Emma Honig	
4289	Audrey Moore	
4290	Cheryl Fulton-Sears	We live miles from the northeastern toxic waste dump which CWM also wants to expand. We need to stop creating all this toxic waste!! We still have waste from the Manhattan Project(WWII nuclear waste). If we dumped it all in Washington maybe someone would stop allowing all this nonsense!
4291	Marissa Goldberg	
4292	Holly Sabean	
4293	Kathy Washburn	
4294	Michael Rothstein	There is so much statistical evidence linking diseases like Cancer, MS, etc. not to mention birth defects, to pollution, that this kind of thing has to stop everywhere. We are killing ourselves!
4295	Jessica Felix	
4296	Ingrid Brennan	
4297	Richard Jewell	
4298	Vic Burton	The poisoning of the planet must stop.
4299	Ken Gilmour	
4300	Patrick CoatarPeter	
4301	Phillip J Crabill	Keep our environment safe and clean, PLEASE!!!!!!
4302	Tracy Peterson	
4303		
4304	Alene Mack	
4305	Sue Christiansen	
4306	Ann Unsworth	
4307	Ray Shafiz	Please stop the mess
4308	Gerry Smyth	
4309	Mike Stone	
4310	David HARTY	Totally irresponsible and reprehensible! This company should be sued under a Class Action. Of course, it only affects the poorest among us so why should anyone care, right? The word is out now. Waste Management should be ashamed, but they won't change until they take a financial hit!!
4311	David Johnson	
4312	Angela Fazzari	
4313	D.C. Leslie-Pringle	Every child gets one chance only to be born perfect ... stop reducing their chances now.
4314	Leslie Wellbaum	
4315	Jon Anderholm	
4316	Joyce Romano	
4317	Nancy Amodeo	
4318	Frances Frainaguirre	
4319	James Racinowski	
4320	a mogavero	
4321	Jeannette Amariles	
4322	Mary Ryan	
4323	Sharon Labreck	
4324	yakini shakir	
4325	Carla Josephson	
4326	Mark Rembe	
4327	Renee La Pan	
4328	Majed Subh	
4329	Quentin Fischer	
4330	Lawrence Greywolf	
4331	annick baud	
4332	Carol North	
4333		
4334	Pilar Zorrilla	
4335	John Grosklags	If you believe that this is OK to do, then how about dumping in your backyard. This is criminal. All folks responsible for toxic waste should live in these communities. Unbelievable.
4336	Marcia Halligan	
4337	Leonida Joy Silao	
4338	Myra & James Sommers	Protect the children and their parents from the Wast Management Plant who are making their children sick with the poisons !!
4339	Juan Ramirez	
4340	Deborah Mathlowetz	
4341	Carol Patterson	

Comment Number	Name	Comment
4342	bernardo alayza mujica	
		I drive the California Central Valley for work and many times go through Kettleman City While going between the 5 and 99 Fwys. I find it unconscionable that a governmental agency would allow the poisoning of innocent people. At the very least have the decency to NOT EXPAND the dump. Give the residents of the area a fighting chance.
4343	Kevin M	Your Truly- A concerned citizen
4344	EMILY AMARO	
4345	Nicki Viso	
4346	Casey Lindgreen	
4347	Pam Warren	
4348	Mack Moore	
4349	Jemimah Barba	
4350	Maria Fontaine	
4351	Jason Lee	
4352	Jose Moran	
4353	Melodi Yanik	
4354	Lily Virani	
4355	elisha Belmont	
4356	Yina Shan	
4357	Rachel Rose Ulgado	
4358	Lindsey F	
4359	Jessica Smith	It's unfair to poison innocent people this way.
4360	Samuel Fuller	
4361	Isabel Kimble	
4362	Elizabeth Indick	
4363	Barbara Robinson	
4364	Marian Zam	
4365	Maria Nasif	
4366	lydia quintero	
4367	Helen Taylor	
4368	Keely Eschenbacher	
4369	Samantha Maffeo	
4370	Terry Dycus	
4371	Carolyn Jaramillo	
4372	Corinne Forssman	We are all living on the same planet!
4373	Gerl Philley	
4374	Holly Zink	
4375	Deborah Imershein	
4376	Melvin Cheitlin	
4377	Mona Yardumian	Dept of Toxic Substances should protect PUBLIC HEALTH, *not* private profits. Please do your job!
4378	George Canada	
4379	Ann Bolek	This is a disgrace! People suffer because they don't have the money or position that others have
4380	Pat Kelly	
4381	Sherry Morris	
4382	Bill Davis	Poisoning people is not acceptable.
4383	Chris Bocian	
4384	Teresita De la Torre	
4385	Kathleen Kelly	I had no idea this was going on. This has been my stop for many years to or from the SF area and
4386	Athena Dykman	
4387	Vivian Ly	
4388	Chris Hawkins	
4389	Andrea Axelrod	
4390	Carmen Hendershott	
4391	Margaret FitzGerald	
4392	Bridget Chorley	
4393	Lee Lindley	
4394	carole jokiel	
4395	Diane Thompson	
4396	Irene Lawrence	
4397	Arlene Germann	Let's carry on the struggle for decent working and living conditions for Farmworkers that was begun by Cesar Chavez!
4398	Charles Garner	Have the corporations put the toxic waste in their back yards
4399	Tate Jenkins	
4400	Mary Puckett	
4401	Sarah Brady	
4402	Dennis Nolan	
4403	Alice ODonnell	
4404	joseph sarchenko	
4405	Matthias Hess	
4406	Meghan Cohorst	
4407	Jean Wiant	

Comment Number	Name	Comment
4408	Donald Cronin	
4409	Joe Ayala	
4410	Vaughn Irving	
4411	Russell Stone	
4412	Margaret Copi	
4413	Sr. M. AMELIE Hawxhurst, R.S.M.	THIS IS A HORRIBLE THING TO LIVE NEAR!!! PEOPLE NEED PROTECTION FROM TOXIC WASTE LIKE THIS!!!BAD ENOUGH DUMP IS HERE NO!! NO!!! NO!!! TO EXPANSION! ! !
4414	nancy mccooy	
4415	Carol Farina	
4416	Barbara Salzman	
4417	kenny lachman	
4418	Cathy Butterfield	We've gone to war over lesser crimes than this. Stop poisoning our citizens, stop destroying arable land.
4419	Ashley Brown	
4420	Laura Lennon	
4421	Debra Rivers	
4422	MANUEL LARA	I WOULD ASK THE PEOPLE WHO RUN THIS COMPANY TO MOVE TO THE COMMUNITY WITH THEIR FAMILIES IF THEY BELIEVE IT IS SAFE.
4423	Maria Pe	
4424	isabel briseneno	not only are we hurting our own species, but the environment. these atrocities must stop!! how convenient it is for rich people to dump their companies' waste on the poor...it's disgusting.
4425	Teri Adams	
4426	Jesse Simons	
4427	Nancy Wagner	We leave I-5 at Kettleman City to go to Atascadero, near the coast. What a tragedy for those who must make their life in this hellhole! Waste Management, clean up this community!
4428	Dr. James H. Lazalier	Move the Department of Toxic Substances Control to Kettleman City, CA
4429	Pat and Gary Gover	
4430	pat fisher	
4431	Irma Morales	
4432	Jill Morrison	
4433	Brittany Sacash	
4434	Rita Griswold	
4435	Fernanda Andrade	
4436	Morgan Coleman	
4437	Karen Andersen	
4438	Ann Garth	
4439	Adair Sherwood	This should not be happening in our Nation ! Please, put a stop to this tragedy.
4440	Shannon Bloom	
4441	Jason Furness	
4442	Louise Zhang	
4443	Nataline Chew	
4444	Ramya Chellappa	
4445	Michelle Ng	
4446	Frances Micran	
4447	Elisa Greco	
4448	Mary Bockover	
4449	Richard Conti	
4450	N P	
4451	nora maya	
4452	Maria Rangel	
4453	Molly Noland	If you do not want this in your town, it should not be in ANY town.
4454	Michael Georges	
4455	Scott Hertel	
4456	Garth Hoyman	
4457	Malachi Roth	
4458	Melanie Stanford	
4459	Mike Watson	
4460	Wayne Brumley	Why are we making more toxic sites while we spend fortunes cleaning them up later? We have a superfund site that still has not been cleaned up right, so why is Waste Management permitted to create another and even expand it while people are dying because of it? It's disgraceful. We here in America represent the highest level of civilized man, but we still act like we evolved from an ape.
4461	melvin carter	
4462	afanna mcmorrow	
4463	Becky Rice	
4464	Julio Grajeda	
4465	Sally Fraser	
4466		Disposing of hazardous wastes should be 100% safe.
4467	Erline Towner	Disgusting
4468	Bernadine Turner	We need to stop producing more and more toxic waste so that this would not be necessary.
4469	Jayne Martin	
4470	Stephanie Spina	

Comment Number	Name	Comment
4471	sandra alvarez	
4472	Susan Austad	
4473	Luis Aguilera	CWM, if you can't live with the consequences, don't pollute. Send advocates to clean your act, not the consciences of these residents.
4474	Delainie Hanson	
4475	Michelle Abreu	
4476	Lisa Davil	
4477	Richard Reichmann	
4478	Dora Luz Valdes	Crueldad humana creada por el dios greedy.....shame
4479	CIRILO SILVA III	
4480	Brent Hepner	
4481	REY LEON	
4482	Mark Lehman	
4483	Shearle Furnish	
4484	David Huebner	
4485	les roberts	
4486	Maureen Berbeyer	
4487	Laura Sacks	This is criminal. I am angry and sad at the same time.
4488	Eileen F Tisdale	
4489	Frances Greenlee	Have we learned nothing?
4490	stacey channing	There has to be another way without sacrificing human health
4491	Lana Schmitt	
4492	Linda Buckley	
4493	Carolyn Pettis	
4494	Joel Forbes	Dump Toxic Waste on the property of the CEO's of company's that produce toxic waste.
4495	Miguel Mendoza	
4496	Kathy Dabanian	
4497	Martha Eberle	
4498	Klaus Pfeiffer	Find out where the owners of waste management live and move the dump site into their back yard.
4499	Iva Riddle	
4500		
4501	Denisse Ochoa	
4502	Gerritt and Elizabeth Baker-Smith	
4503	stephanie cantu	
4504	Wayne Wildman	
4505	Brian Bobko	
4506	Maureen Saraco	
4507	Linda Parena	
4508	Charmaine Foltz	
4509	Lisa Goldberg	
4510	Sophia Hansen-Day	
4511	Vernon Schoenhals	
4512	William Briggs	
4513	Dario Silva	
4514	Renee Peterson	
4515	Margaret Toews	
4516	Zari Trhaas	
4517	alexandra christie	
4518	Arnold Gore	
4519	Abigail Gruchacz	
4520	Nancy Kilgore	
4521	Chad Thompson	
4522	Kneide Nascimento	
4523	Korrie Shell Fuller	
4524	Virginia Camerman	
4525	Kelly McConnell	
4526	Ricardo Garcia	
4527	Ronald Warren	
4528	Helen Adamo	
4529	Ben Basin	
4530	Nick Barcott	
4531	Judith Daniel	Do not expand this landfill!!!! Let's get control of toxic materials.
4532	Denise Lytle	
4533	Diana Brunswig-Bosso	
4534	sean brennan	
4535	Sandra Ciresi	
4536	Tim Wallace	

Comment Number	Name	Comment
		It's absolutely not right that the negative impacts of this waste continue to increase on a group of human beings in Kettleman City (not to mention the environment and local species). There needs to be a multi-level approach: 1) making a plan to decrease toxic waste and 2) since toxic waste won't go to '0' overnight, it needs to be disposed of in the least invasive way possible to both humans and then environment. This strategy needs to be DEEPLY and THOUGHTFULLY explored. It's easy to ignore when it's not your babies dying.
4537	Ashley Sturm	
4538	charlie nitsch	
4539	Rafeeq Sabry	
4540	Drew Martin	
4541	Ralph Alvarez	
4542	Joel Trupin	People can not live healthy lives in filth.
4543	niloofar shambayati	
4544	W W.	the facts speak
4545	Jasmin Djokaj	
4546	susan Iancker	
4547	Paul Madarasz	
4548	Benjamin Allen	
4549	Jed Holtzman	This is an outrage.
4550	Lew Douglas	
4551	p Parsons	
4552	Alan Bixler	
4553	leslie smith	
4554	Medard Spencer	
4555	Wendy Waidson	
4556	Michael Blakesley	
4557	Lisa Sood	
4558	Ellen Langley	
4559	Alma Hofverberg	
4560	Robert SAnjour	
4561	Glenn Woodard	
4562	John R Huff Jr.	
4563	Julia Fujioka	
4564	Maureen Nolan	
4565	madeleine mccristal	This is despicable, hold your council responsible....
4566	Phillip Leija	
4567	Kim Lewis	
4568	Chris Kubala	
4569	Harriet Martinez	
4570	Pam McCall	
4571	Patricia Gause	
4572	Wendy Ebersberger	
		Everyone should have the right to grow and live in a poison free area. This world is to beautiful and great a gift for us as human beings to allow this to happen any where on earth.
4573	Marjorie Bly	
4574	Dianne Risdon	
4575	phil vanasse	
		One of the most irresponsible act done by our Gov't. Agency without regard to the people because they have no relatives whatsoever in this poor town. A despicable thought running through their minds(Politicians) to whom we voted for them but no qualms in collecting taxes for us and doing nothing. Are we really into this politicking era as a way of life? P-olitics, O-verrides, L-ife, I-rresponsibly, T-urning, I-gnorance, into C-arelessness, S-system.
4576	Mario Cagaoan	
4577	Michelle David	
4578	Chelsea Jewett	
4579	Mike Gallas	
4580	Susan Lada	
4581	Dorothy Tartaglia	
4582	Julia Koschulla	Reminds me very much of Erin Brockovich's pursuit of Pacific Gas and Electric...do not let them get away with polluting the environment unrestricted
4583	Dawn Dale	Toxic waste in close proximity to this community is causing health problems and deaths!! Please do not let this plant expand!!!
4584	Billie Knighton	
4585	Pj Ormerod	
4586	Madhu M	
4587	Charlene Reader	
4588	Peter Theis	
4589	John Curotto	
4590	Paulette Amadi	
4591	Karen Chase	
4592	Angel Rodriguez	
4593	James Harmon	
4594	Barbara Duehn	
4595	Bethany Hurley	

Comment Number	Name	Comment
4596	Tobias Zackrisson	
4597	Aron Thomas	
4598	Beth DeHoff	I'm doing a graduate research paper on the Kettleman City environmental racism story. ¡Buena suerte!
4599	Glen Williams	
4600	Anne Staggemeier	
4601	Margarita McLarty	
4602	Deborah Cusick	Please consider your own grandchildren as you leave this legacy of irresponsibility!
4603	Joanne Chenoweth	
4604	Stephen Weitz	
4605	Frieda Gardner	
4606	Mike Mizell	
4607	Robin Rae Swanson	
4608	guillermo cancio	
4609	Joe St.Clair	
4610	sanford abrams	
4611	Eliot Waterhouse	
4612	Mark Fleeman	
4613	Clarke Reese	
4614	Randall Webb	
4615	Marvin Howard	
4616	Julia Torquati	
4617	Benita Crow	
4618	Terry Poplawski	
4619	Barry and Gretchen Draper	
4620		
4621	Alexandra Tumarkin	
4622	patricia weintraub	
4623	Dave Luckens	poor people have rights too.this outrage would not be perpetrated on an affluent community
4624	Lucy Armstrong	
4625	Lisa Miller	
4626	Walburga Landy	
4627	Joy Keeping	
4628	Heidi Murray	
4629	Carissa Brands	
4630	Patricia Bereczki	
4631	Rachel Sanyal	
4632	Constance Cummings	
4633	jim slaybaugh	
4634	Marjorie Steakley	
4635	Nolan Warner-Sullivan	
4636	Connie Stomper	
4637	Leslie Geffen	
4638	suzanne myers	
4639	Cynthia Adams	
4640	Monica Niculescu	Maybe you should get http://www.avaaz.org involved. They do great work with causes like this. Good luck and God bless you all.
4641	Bob Lentz	
4642	Maryann LaNew	
4643	naomi zuckerman	first, we MUST stop producing ALL toxic waste. the existing waste must be disposed of in 100% contained and safe ways and must be done hundreds of miles from inhabited places.
4644	Adela Marina	Treat people with respect. Real democracies do not kill and make their people sick.
4645	Pete Wade	
4646	Mj Faris	
4647	Ormand Tegland	
4648	randy oravec	
4649	Cate Manochio	
4650	Susanna Odry	
4651	Irene Radke	
4652	rosemarie waiand	
4653	adia harris	
4654	Karen Mejia	
4655	Mr and Mrs Lewis pURNELL	
4656	Cynthia Garcilazo	
4657	Heather Collins-Dudas	
4658	Doug & Carol Wingeier	
4659	Nubia Padilla	
4660	Malcolm Blue	You want to double the size of the largest hazardous waste dump this side of the Mississippi? Bright! Really bright!
4661	Mary Rivera	
4662	Yanira Arias	
4663	Gladys Schmitz	This is immoral and absolutely intolerable and must be stopped.
4664	Audrey Strauss	

Comment Number	Name	Comment
4665	Feyna Shapiro Nygren	You wouldn't allow this in YOUR backyard so don't allow it in ours!
4666	Amy St Lawrence	
4667	Flavia Jimenez	
4668	Ken W	
4669	Rubi Fregoso	
4670	Tina Gonzalez	
4671	Allen Rozelle	
4672	Angela Anderson	
4673	Danae Gutierrez	
4674	Danae Gutierrez	
4675	Charles Delannoy	It is wrong for this to occur in any community.
4676	Carole Seman	
4677	Laura Adams	
4678	Steve Breyman	
4679	Alexandra Bonshahi	This is horrendous and must stop NOW!!! We are talking about people -- about little children and babies! For the love of God, please STOP expanding the toxic waste dump near Kettleman City.
4680	Debbie Bray	
4681	Carlos Duarte	
4682	Brett taylor	
4683	Paquita Garatea	
4684	Ana M Robles Rangel	
4685	James Brady	
4686	Bettina Schlegel	
4687	cathern murphy	
4688	Caroline Bridges	
4689	Malcolm Campbell	
4690	samantha fox	
4691	kat strickley	
4692	Alexis Bay	
4693	Bruce Morris	
4694	Jesse Saenz	
4695	B Thomas Diener	
4696	Ellen Piascik	
4697	Cristina Gaston	Don't let this happen to humans.
4698	Lenore Jansen	how can people be so stupid... why not put it in there front yards and let there familys be exposed to this... and quit killing mother earth....
4699	Stephanie Ramos	
4700	Astrid O'Brien	
4701	Al Mendelsohn	
4702	sam yim	
4703	Jieun Hong	
4704	Honour Horne-Jaruk	
4705	M_nica Alfonsin	
4706	Sherry and Leo Frumkin	
4707	jae pil park	
4708	Phong Nguyen	
4709	Bob Rominger	
4710	Joan Pritchard	
4711	Elizabeth Meyer	
4712	Christina Martinez	
4713	daniel gonzalez	
4714	RM Krebs	
4715	Ana Trinidad	
4716	Johan soderlind	
4717	Mariann Midboe	
4718	Elmer Anderson, Jr.	
4719	Thomas Johnson	
4720	Abraham Makany	
4721	Jennifer Watson	
4722	frances Castro	
4723	Debora Michel	
4724	Marilyn Sebek	
4725	Virginia Vega-Siferd	
4726	Karen Malpede	Why don't we care about the health of our children and the health of our only home, Earth?!!
4727	Ron Herrgesell	
4728	Phoebe Vaneveld-Taylor	
4729	Felicia Dale	
4730	Sandra Widland	
4731	Thomas Sutton	
4732	Sandra Hendricks	

Comment Number	Name	Comment
4733	Claudia Ryan	What words can be expressed that will turn the continued insanity of pollution into reason? What part of horrible health issues is not understandable? I marvel at those who are placed in positions of power who seem to have a totally different perspective of reality than those of us who ACTUALLY LIVE with reality.
4734	Ernest Martinson	
4735	Wanda Harper	
4736	Leonard Cannon	
4737	Zayda Miranda-Makany	Stop the abuse, this are humans not animals. Even for animals are protections and laws.
4738	Bridget Guiza	
4739	Lisa Serrano	
4740	Sue Lunbeck Butler	
4741	Evan Centanni	
4742	Michelle Culbertson	
4743	sharon byers	
4744	Brent Jensen	
4745	Mary Calhoun	
4746	chris megna	
4747	Jason Balicki	
4748	Luiz Garcia	
4749	Corinne Cogger	
4750	Tiffany Beard	
4751	Daniel Casarez	
4752	Natalie Blackstock	
4753	Zoe Brent	
4754	Cathleen Kelly	
4755	mary babington	
4756	Greg Campbell	
4757	Sara Eng	
4758	Charles R. Belt, MD	
4759	Frank Sierra	
4760	Emma Sevene	
4761	Robert Carmichael	
4762	Christine Mitchell	
4763	Alison Richards	
4764	Alysia Cooper	
4765	L Wilgus	More research needs to be done as to what is causing these children's health issues and DEATHS before an expansion takes place. Clean up your act WM.
4766	Enakai Ciseaux	
4767	Cassandra Rand	
4768	Elaise Bush	
4769		
4770	Brendan Moss	
4771	Bruno Silva	
4772	Tu Ngo	
4773	Kacie Phillips	
4774	Indigo James	
4775	Edward Wiltse	
4776	Marcus Ebels	
4777	Aurora Nasi	
4778	Kiara Sanders	Preservation of human life, whether in poverty or not.
4779	Courtney Catlett	
4780	Ruth Bell	
4781	Carl Tyndall	
4782	michael guyette	
4783	Alivia Millabush	
4784	EVE BROMBERG	
4785	Bethanie Lane	
4786	Keshav Sapatnekar	
4787	Cassidy Cheddar	
4788	Dave B.	
4789	matt wright	
4790	Kelsey Rogers	
4791	Nik King	
4792	Jessica Finkbeiner	
4793	Rachelle Roach	
4794	Meghan Hurley	
4795	Elizabeth Lee	There are plenty of ultra-desolate stretches in Nevada, Utah and other sparsely populated states. Why locate these horrific dumps in the most populous state in the Union? Our Hispanic citizens are important to California, and turning a deaf ear to their concerns is turning a deaf ear to every citizen in California. Wake up, government: many of us no longer trust you and wonder who is REALLY pulling the strings.
4796	Julie Gundersen	
4797	Anna Penttinen	Stop protecting the polluters and start protecting the people. This makes me sick.

Comment Number	Name	Comment
4798	Meg Croshier	
4799	Alyse Buitre	
4800	Elisabeth Messner	
4801	Erin Connor	
4802	A L	
4803	Genevieve Cournoyer	
4804	Bill Pinkham	
4805	Sarah Springer	
4806	Orlando Hinojosa	
4807	Candace Todd	<p>California is my home; it is where I come from, where my son was born, and where most of my family lives today. The harm to one of its communities ultimately involves the fates of all of its communities.</p> <p>Businesses need to act as good neighbors every bit as much as individuals if we are all to survive and thrive together.</p> <p>If, instead, business organizations look only at the near term and the bottom line, they are not only unethical but unlikely to survive and thrive in the long term. Investors can divest and move on, but the organization itself will fail financially and/or face extended legal costs & penalties (as a result of damage and death) that erode its profitability over time.</p> <p>Good business sense (not just the practice of public relations) can readily prevent this spiral into death, damage, and diminished productivity, but it takes intelligent long-term planning. It requires good leadership on the part of businesses and communities.</p> <p>It is pretty disappointing when a corporation of WM's magnitude cannot find this level of skill and ability within its own ranks. Such mediocrity might be able to spin numbers on the spread sheets, but as the company becomes ever more mired in disasters it will pull the rest of California into its troubles.</p> <p>So if WM can't fix its own fate, then California needs to step in and do so instead, before the level of toxicity is beyond any reasonable containment.</p>
4808	Aisling Cooney	
4809	wes lamb	We need better treatment plants and for companies to use less dangerous chemicals than to just dump everything where it can hurt people.
4810	Lila Cornell	
4811	Sheralee Fielder	
4812	Karen Aym	We are tired of having rich white men cover us in their toxic garbage. We are tired of our children dying so that the rich can become richer.
4813	Jhoskesia Manigault	
4814	Martin Cisek	
4815	Marin Hemming	
4816	Joseph Tanzi	
4817	Rachel Turner	
4818	Molly Labine	
4819	Ann Klinefelter	
4820	Sarah Kimbrough	Environmental Racism cannot prevail.
4821	Kasia Markham	
4822	Isobel Birks	
4823	Erik Rowen	
4824	Ana Bowden	
4825	Angelica Huggins	
4826	meredith kawali	
4827	Megan Borowski	
4828	Cherrie Palmer	
4829	Sam Lord	
4830	Gregory Wang	
4831	hannah caburian	
4832	Amy Huffenberger	
4833	Rachel H	
4834	Claire Helmberger	This is another example of wastefulness destroying lives and this cannot go on.
4835	Jayne Worsham	
4836	Deena Hassanein	
4837	Nathalie Lozier	
4838	Shannon Holman	
4839	Rachel Donat	
4840	Danielle Wozniak	
4841	Stacy Willis	
4842	Rafael Magat	
4843	Samantha Sayers	
4844	Monica Garza	
4845	Karen Obertubbesing	
4846	Sonia Dailey	

Comment Number	Name	Comment
4847	Col Williams	
4848	Kenisha Thrower	
4849	Lena Budinger	
4850	Omotayo Balogun	This is a huge human rights violation and it needs to be remedied! People have the right to clean water! Toxic waste needs to be disposed of appropriately!
4851	Laura Machado	
4852	Ashley Dobson	
4853	naomi warren	
4854	Amanda Dowd	
4855	rachel beasley	
4856	River Reier	
4857	Jacklyne Sanchez	
4858	Haley Nevers	
4859	Rosa Vielmas	
4860	Reiana M	This toxic waste project is ridiculous think of the community that is being effected by it!
4861	Breana Henderson	
4862	Rita Camacho	
4863	Lindsey Best	
4864	Nathan Graves	
4865	Olivia Thompson	I am so sad and disgusted by this. Justice must prevail.
4866	Jamie McLaughlin	
4867	Bonnie Nichols	
4868	Karla Salamanca	
4869	sora kairi	
4870	Kayla A	
4871	Mitchell Wilson	
4872	Liz Z	
4873	Katie DiGirolamo	
4874	Marie Willis	
4875	amy mellor	
4876	Anthony Johnson	
4877	Jessica M	
4878	Emilia Boer	
4879	Vanessa fregoso	
4880	Rebecca Scott	
4881	Alexandra McKay	
4882	Chris Womack	
4883	RaShondra Banks	
4884	Luis Gonzalez	
4885	Leslie Montes	
4886	Liliana Sampedro	
4887	laura p	
4888	Rebecca Layman	
4889	Carly Thompson	
4890	Clarissa Mota	
4891	Evyn Evans	
4892	Donna Hutt Stapfer Bell	
4893	Amara Vear	
4894	chioe opfeil	
4895	Johanna Caulfield	
4896	Katie B	
4897	Max Eber	
4898	Alexandria Ortiz	
4899	Sally Steffens	
4900	Jade Yong	
4901	Jezebel Nguyen	
4902	Amanda F.	What is being done to the citizens of Kettleman City is absolutely horrific. To knowingly dump toxic waste despite the extremely detrimental effects on the human population in the area is a soulless act. Now, the dump is potentially going to double in size?! This madness needs to end. Shame on those in the Department of Toxic Substances Control if they allow this to happen.
4903	Oscar Gonzalez	
4904	Rose Arellano	
4905	Sam Koh	
4906	pilar montenegro	
4907	Clarinda St. Clair	
4908	katina rivera	
4909	Hannah Moitt	
4910	marco Trujillo	
4911	Jude Dixon	
4912	Shannon Rohane	
4913	daniel Dixon	
4914	audrey rosser	
4915	Jeanette Orta	

Comment Number	Name	Comment
4916	Nathalie Rock	
4917	minor paredes	
4918	Laura Moore	
4919	Cali Dorsch	
4920	Indiana Womack	
4921	Tracy Evans	
4922	Mia Montagna	
4923	Andy G	
4924	Diana Lopez	
4925	Cecilia Kuuppo	
4926	Zerena Diaz	
4927	Amelia Vergel	
4928	Michele Zaslavsky	
4929	Linda Viagran	
4930	Dean Welliver	
4931	Anastazija Markovich	
4932	Ruby Meza	
4933	Alison Kim	
4934	asra hussain	
4935	Victoria Baker	
4936	Jo Kelly	
4937	Anna Hubbard	
4938	Ninette Rincon	
4939	cindy el sayed	
4940	yamileth gonzalez	
4941	Ashley Buie	
4942	Taylor maximick	
4943	Monica ONell	
4944	Lea Scheer	
4945	Kelly-anne Wynd	
4946	Suzy Hernandez	
4947	Andrew Quirk	
4948	Leah Bean	
4949	Sierra Nowlin	
4950	Molly Gabriella Huldt	
4951	Rebecca Doane	
4952	Jahlani Smothers-Pugh	
4953	Alison Marks	
4954	Andye Lam	
4955	Chris New	
4956	kelly dunn	
4957	E Jennings	
4958	Halie Stone	
4959	Nercolas Cerge	
4960	Andrea Shettle	
4961	the riz rizo	
4962	Celeste C	
4963	C Welta	
4964	Rebekka Nilsen	Unacceptable. It is terrible that the locals have to live under so dangerous material.
4965	Gabby Hewitt	
4966	Matthew Gammons	
4967	S R	
4968	Ana Tara	
4969	Bon Louthan	
4970	Sarah Gillock	
4971	Katie A	
4972	Franziska Laue	
4973	Kremena Petrova	
4974	Jennifer Kay	
4975	K.M. Davis	
4976	kathleen benitez	
4977	Allison Bowers	
4978	Aoife Kavanagh	
4979	michele kelly	
4980	Jaci Johnson	
4981	Rebecca Eastham	
4982	Sultana Q	
4983	Harrel Deshazier	
4984	Elizabeth Skalecki	
4985	Devon Pena	Ending toxic racism should be among the highest priorities of an administration that feigns to have revived environmental justice at the EPA. Get on with it!
4986	Katherine Knudson	
4987	Amanda Wilson	

Comment Number	Name	Comment
4988	Kathleen Rasley	
4989	Mariah Jordan	
4990	Sinead Rustem	
4991	Ash Reither	
4992	Isabel Gendler	
4993	Sarah Reysen	
4994	Dana Wierzbicki	
4995	Laura Fraser	
4996	Jeri Coleman	
4997	Sharon Cheng	
4998	Calliope Hartmann	
4999	Keanna Ardis	
5000	Susanne Wagner	
5001	Jaclyn Poulton	
5002	Gabrielle Freeman	
5003	Cynthia Enlow	
5004	Kiley Brown	
5005	Alyxis Schwab-Tidwell	
5006	Alice Baddeley	
5007	Abigail B	
5008	Allyssa Crook Moore	
5009	K Herb	
5010	Katie Hale	
5011	Andrea Jessen	
5012	Aysha Shehim	
5013	Jessica Davis	
5014	Gayle Milne	
5015	Brenda Ash	
5016	Hannah Speregen	
5017	Sarah Watts	
5018	Casey Kapps	
5019	Chloe Bramwell	
5020	Paula Rittenhouse	
5021	Jasmine Reynolds	
5022	Teagan Werry-Evans	
5023	Brenna Blackwell	
5024	Andri@anne Bienvenue	
5025	Rebecca Miller	
5026	K Reen	
5027	June Harvey	
5028	Rachel Bortosky	
5029	Cloud Behrschmidt	
5030	Margaret Barlow	
5031	Annelise Rue-Johns	
5032	Christiane Wagner	
5033	Sylvia Gaenzle	
5034	Emily Plessas	
5035	D Davis	
5036	A.J Thomas	
5037	Nakia Jones	
5038	Carola Beckers	
5039	lizi newman	
5040	Ciera Gump	
5041	Amanda Orzel	
5042	Jennifer Evans	Human lives are more important than a profit: find a way to safely dispose of or re-use your waste, instead of dumping it and walking away. Children need clean water and air, good food and a place to play, they don't need toxic waste dumping grounds next door to their homes.
5043	Ayesha Rahman	
5044	Maria Giulia Salvia	
5045	Teresa Erinstein	if you wouldn't bury it in YOUR backyard, sirs, then with respect, please refrain from burying it in the backyard of Kettleman.
5046	Regina Velasco	
5047	Kelli Taptto	
5048	Jenni Batt	
5049	Meghan Allen	
5050	Charisa Houghten	
5051	Linn W	
5052	Dakota Gonsalves	
5053	Leah Hawes	
5054	CHRISTINE Tsai	
5055	Claudia M	
5056	Stephanie Porche	
5057	Lauren Baker	

Comment Number	Name	Comment
5058	L. Shieh	
5059	David Klein	hueones.
5060	Sarah Hash	
5061	David Wood	
5062	Rachel Sager	
5063	Megan Ruiz	
5064	Cobi Price	
5065	mikayla groom	
5066	Sara Matthews	
5067	Camille Blouch	
5068	Melanie Canales	
5069	Lydia Taylor	
5070	Marie Schoenenberger	
5071	Constanze Ober	
5072	Ellen Shin	How is it that they have such little empathy, that they don't realize the loss of human lives? How is it that money and reputation is worth more than entire people?
5073	Gloria Fraser	
5074	Marissa Luna	
5075	Karissa Kaveney	
5076	Blanca Escobedo	
5077	Julienne Ablay	
5078	Christel Okihara	
5079	Mardi Billman	
5080	Amy Vanderwarker	Expanding the Kettleman City landfill is unconscionable. Deny the permit today!
5081	Sophia Lafergola	
5082	petr storozhenko	
5083	ashleigh colemon	stop toxic waste dumping! save the children!
5084	Kate Lubeck	
5085	Josie Jacobs	
5086	muna javaid	
5087	lance nelson	
5088	Miranda Murray	
5089	Naomi Bosch	
5090	Abby Levens	
5091	orun williams	
5092	Denee Kaveney	
5093	Melissa Trout	
5094	Melanie Rivera	
5095	Vivi Hoang	
5096	Catrine Logan	
5097	kathleen viele	
5098	Marty Otanez	
5099	Linda Larsson	
5100	Louella Mainka	
5101	sierra silva	
5102	E. Guthardt	
5103	Elizabeth Cotton	
5104	Jessica Smith	
5105	Michelle Morris	
5106	Mary Baldwin	
5107	Jillian Allen	
5108	Nicolas Daily	
5109		
5110	Sarah Keefe	
5111	Gabrielle Field	
5112	Julia Falley	
5113	Izzy Okaya	
5114	Ashley Martin	
5115	Caitlin Riggsbee	
5116	Ashley Scnio	
5117	Katrina Miyuki	
5118	Alexandra Collins	
5119	Nicole Gemmill	
5120	Davide Roman	
5121	D Dickinson	
5122	Barbara Douglas	
5123	Minal Kalas	
5124	Alanna F	
5125	Kristen Wright	
5126		
5127	Michelle Van Peborgh	
5128	Kristen P.	
5129	Vivien Rupp	

Comment Number	Name	Comment
5130	C Niccals	
5131	Isabella Strafford-Antonio	
5132	Jessica Donaldson	
5133	Ann Maldonado	
5134	Alba Liripio	
5135	Julie Steinhauer	This is sad that greed takes precedent over life...
5136	Christine Mulholland	
5137	Sarah Noone	
5138	tammy wood	
5139	Susan Tornicelli	
5140	Kaylee W.	
5141	Sarah B	
5142	Sal Kaine	
5143	Tyson Balmer	
5144	Michelle Lance	
5145	Jess Fishenden	
5146	Sophie Serket	
5147	Ann Marie Kernen	
5148	Tina Oh	
5149	Patrice Spruiell	
5150	Penelope de St. Paer-Gotch	
5151	Rachel Anderson	
5152	Danielle Smith	
5153	Melissa Smallwood	
5154	Elena Jimenez	
5155	Jennifer Kim	
5156	Gabriella Gold	
5157	Charles Sandoval	
5158	shavella brown	
5159	Joseph Mullett	
5160	Helen Crow	
5161	Elaine Herzog	
5162	Alexandra Fisk	
5163	rocio gonzalez	
5164	Rosalie Oceanna-Kolb	
5165	Christian Heinold	
5166	Gabrielle Patterson	
5167	Emily Tobin	
5168	Alyssa Jones	
5169	Anna Mitchel	
5170	Ana Hernandez	
5171	isa e	
5172	Robert Brewer	If you know about this and do/say nothing you are as guilty as WM.
5173	tracy wangui	
5174	M Garibov	
5175	Cassandra Lozano	
5176	Caitlyn Gillette	
5177	d g	
5178	Kaili Kreiner	
5179	Hannah Carrillo	
5180	Consuelo Moreno	
5181	Mitchell Johnson	Greed will kill us all
5182	Karen Hatlestad	
5183	Tricanne Wilson	
5184	Blake Stitilis	
5185	Rachel De La Cruz	
5186	Emma Y	
5187	Dawn Larson	
5188	Brittany Stump	
5189	Kassandra Alaniz	
5190	Thea Stevens	
5191	Stephanie Forsyth	
5192	Carmen Wu	
5193	Josephine Nguyen	
5194	Deb Kobres	
5195	Yael F.	
5196	Larisa Stow-Norman	How can it even be legal to dump toxic chemicals next to communities? Would you want to live next to WM? Would you want your children to be exposed to these toxins? Putting profit above the health of our people is criminal and needs to be rectified. Being profitable doesn't have to endanger our people and our precious planet. It's time for conscious business models.
5197	Fernanda Aragi_n	
5198	amanda curry	

Comment Number	Name	Comment
5199	Cynthia Brown	This is sickening. I mean that quite literally: it is sickening. I wish that I believed in heaven and hell. At least then I would have the small comfort of believing that these...individuals...would be spending eternity in hell. That would be a small start in giving them the retribution they deserve, and have earned.
5200	Elizabeth Calderon	
5201	Jamie Stevens	This is completely disgraceful. I hope this petition does what it has to do.
5202	Jo Tennent	
5203	Lauren Chin	
5204	Kate Taylor	
5205	Rozanna Perry	
5206	Guangjing Chen	
5207	N. Zickert	
5208	Vic Kern	
5209	Jane Al-Mashat	
5210	James Read	
5211	Penney Morse	
5212	Kaylie J.	
5213	Pamela Petty	
5214	Tiffany Cho	
5215	Brenda Franco	
5216	Katrina Kopec	
5217	Jeanette Warkentin	
5218	Marji Beach	This is a disgrace and a tragedy.
5219	laura rosales	
5220	Omwe Elad	in solidarity and against environmental racism
5221	Sarah Richardson	
5222	Samantha Demaris	
5223	Andrew Gustafson	
5224	Magali C.	
5225		
5226	Naomi Parker-Reyes	Stop filling communities with toxic waste. Recognize your greed and stop making a profit on poison and other people's suffering. You are human. Remember this.
5227	K W	
5228	Terry Eaton	
5229	Eugene Campos	
5230	Katherine Laase	
5231	Vivian Ha	
5232	Dylan Cooper	Revolting breach of intellectual honesty and good faith.
5233	Hannah Ein	
5234	Virginia Gregory	
5235	Brian Bogucki	
5236	kathy fugere	Is Erin Brockovich informed of this big problem
5237	Louise Backlund	
5238	daniel mcgowan	
5239	Hannah Birch Carl	
5240	Claudia Quijano	
5241	Katie Roadnight	
5242	Richard Strain	
5243	Holly Disch	
5244	Roselyn Krapf	
5245	Alice Backlund	
5246	Leathia Miller	
5247	Brendan Elefante	
5248	Sal Conigliaro	
5249	maria christodoulou	
5250	Hailey Hamias	
5251	Max Hakim	
5252	Akash Shetye	
5253	Isabella Swyst	
5254	George Bucceri	
5255	Belal Taher	
5256	Susanna McGrath	
5257	Gonzalo Quinones	
5258	Alejandra Lemus	
5259	Andrew Obergh	
5260	Ashley Barnett	
5261	Kat Abayev	
5262	Max Gibson	
5263	Jonathan Rutchik	
5264	Marina Lupu	
5265	Ankoor Talwar	
5266	Christopher Correa	

Comment Number	Name	Comment
5267	Stephanie Marino	
5268	Ariel Garcia	
5269	Eminel Cooper	
5270	Kevin Chand	
5271	Kyle Reddy	
5272	Amarie Calovini	
5273	Justin Wang	
5274	Jessica Hernandez	
5275	Julie Thomas	
5276	Bijan Aime	
5277	Adel Elkosh	
5278	Marguerite Roberts	
5279	Nina Gadmer	
5280	Alex Thomas	
5281	Sam M	
5282	Karan Singhal	
5283	Kelly Hird	
5284	Talya Auger	
5285	Katherine Elliott	
5286	peter gamino	Waste Management: As casually as you sponsor golf tournaments, you foster birth defects & death in Kettleman City.
5287	Jennifer Walker	
5288	Adam Williams	
5289	Sandy Oglesby	This is a horror story that no mother, wife, sister, auntie, or Nana wants to hear about the children she loves! I'm so sorry and pray for a solution....poverty is a unspeakable participant...money talks!
5290	nora hanson	
5291	Jenna Mack	
5292	Mandy Smith	
5293	Ean Kessler	
5294	Richard Warren	
5295	Chelsea Dale	
5296	Rebecca Gindin-Clarke	
5297	Ira Gerard	WM, you have blood on your hands.
5298	Chloe Sheppard Shaw	
5299	Kerr Ingram	
5300	Sonja Gjokas	
5301	Thom Fistner	
5302	Sten Ritterfeld	
5303	Joana Frey	
5304	Christian Caballero	
5305	Colleen O'Brien	
5306	John Shayegh	
5307	Kim Chaffee	
5308	Saida Ponce	
5309	Laurel Leake	
5310	Heidi Weston	
5311	Timothy Perkins	
5312	Amanda Tinoco	
5313	Elizabeth Bryant	
5314	Adriana Ruiz	
5315	Darryn Ambrose	
5316	Joyce & Ray Denne	I remember when the runoff from the fields was so toxic horns were installed around the pond to keep the birds away after thousands had been killed...we cannot allow this to happen to our fellow humans.....
5317	John Dierig	
5318	Niki La Teer	
5319	Francis Dias	
5320	Arielle Tabor	
5321	Malia Cumming	
5322	Wendy Trichell	
5323	Anthony Mihovich	I would encourage them to find an alternative to dumping waste, or a way of minimizing the waste that they produce.
5324	Aura Anttila	
5325	Grace Feldmann	
5326	Megan Kennedy	
5327	Richard Daniels	My heart is with all the victims and families of these terrible trials. I hope that a solution to the problem can be figured out and put into action.
5328	Sue Shell	
5329	James Hagger	
5330	Michelle Garcia	
5331	Kimberly Wiley	
5332	Alex Neff	

Comment Number	Name	Comment	
5333	Lisa Tripoli		
5334	Elyette Weinstein		
5335	Jess Perry		
5336	Sabina Carr		
5337	Susan-Lynn Johns		
5338	Ande Kobek	Erin Brockovich where are you?! This is absolutely shameful! I just signed a petition to help the expansion of their facility & because it's Waste Management you probably use their company to haul away YOUR trash, you're paying for it!	
5339	Lily Naha		
5340	Rebecca Hoeschler		
5341	Cressell Spoo		
5342	Emma Christian		
5343	Terry Richmond		
5344	Tammy Lettieri		
5345	Kelly Mehalco		
5346	Aesha Lorenz Al-Saeed		
5347	Lynda Pauling		
5348	Jesse Gundersen		
5349	Marjorie Helm		
5350	Justin Lawson	This is an eery repeat of what happened at the Love Canal, NY, 30-odd years ago, don't you think? Hasn't a lesson been learnt here?	
5351	Jacky Ellis		
5352	pablo corpus		
5353	MJ Corona		
5354	Carlos M.		
5355	Karen T Morales		
5356	Angelica Vanecek		
5357	Hanna Michael		
5358	haleigh paige		
5359	Erka Rabura		
5360	Ani Abu		
5361	lynds kreig		
5362	Elise Fiala		
5363	Rachael Juedes		
5364	Janna Trautwein		
5365	Johan Björk		
5366	Catherine Jayne		
5367	devina romero		
5368	Jesus Guzman		
5369	Timothy Farrell		
5370	Luis Ojeda		
5371	Andrew Yip		
5372	Jezebel Bong		
5373	Judy McNeilly	Would you want this in your county, near your farmland? Toxins must be reduced, not allowed to spread and spread indiscriminately. Toxins are poisons! Take a stand.	
5374	Leonard Adame	Do not let this toxic dump expand. If the government supporters of this rotten establishment believe it is safe, then let them move here with their children.	
5375	Susy Chavez		
5376	Jodi Golden-Lund		
5377	Mary Ann Cramer		
5378	Jose	One of these people is your relatives (pretend.. could easily be true and is if you go back enough). Do they deserve this? There are other neighborhoods that can hold their own and sacrifice to hold their slice of America's toxics. If not and if this can't be buried out somewhere away from all people, then we have a real problem, but these folks need a break while one of us handles the next batch of toxics.	
5379	Kira Kratzer		
5380	Donald Hermanns		
5381	Karen Shovein		
5382	Patti Montgomery		This is just wrong.
5383	Christine Frank		
5384	Toneyh Blanks		
5385	Miriam Mangini		
5386	Veronica Eady		
5387	Barney McConias		
5388	Natalia Ospina		
5389	Anne Freas		
5390	Ronni Taylor		
5391	Jemima Wynn		
5392	Erin Thomas		
5393	Erin Thomas		
5394	Violeta Enciso		

Comment Number	Name	Comment
5395	steph lau	
5396	Richard Durante	
5397	Evelia Rodriguez	
5398	Darin Jones	
5399	Andrea Rincon	
5400	Fernanda Perez	
5401	Melanie Gomez	
5402	danielle miller	
5403	nataly gonzalez	
5404	Cindy Saavedra	
5405	Sal Rosas	I live down the road from Kettleman City. I went to school with people from there and I have worked as a substitute teacher there. Something is certainly wrong. Where I live in Avenal, we have a huge dump where L.A.'s garbage gets shipped and it's horrible. The area also has a huge problem with Valley Fever. I should know. I became infected. It's so bad the government ordered two local state prisons to move infected prisoners. Yet nothing has been done for the people.
5406	Emmanuel Macias	
5407	Maurice Rutley	
5408	Kendall McKee	
5409	Maiya Osife	
5410	Dana Blow	
5411	Paulina Olvera	
5412	Kelli Cleveland	
5413	Sarah Yellow Eagle	
5414	Nora Karol	
5415	Alexa Tomassi	
5416	Ellison Langford	
5417	Sharon Suzuki-Martinez	
5418	Andrea Kiepe	We can't let this happen, please take a stand for public health and demand better, more responsible solutions to toxic waste. Thank you!
5419	Jessie Duke	
5420	Shelby K	
5421	kiana tavakoli	
5422	Randall McGrew	Toxic waste is just one of the hazards Man has thrust upon our world destroying the environment we all depend upon. The claims of business and industry that they require these sites without which they would not be able survive is an excuse to put money, and power it buys above Humans. Anyone who does that has lost his or her Humanity. It doesn't matter if one or a million are adversely effected. It is too much, and we have to stop it.
5423	P Roberts	
5424	mike kinkel	
5425	Nina Hrebenko	
5426	Elyse Rickard	
5427	Bethan Thomas	
5428	caitlin rash	
5429	Rebekah Rosen	
5430	Michelle BarlondSmith	NO MORE SACRIFICE ZONES STOP POISONING THE HUMANS
5431	Wendy Reed	
5432	Gail Wadsworth	
5433	Lucia Schnetzer	
5434	Jeniffer De Paz	
5435	Jeniffer De Paz	
5436	Ann O'Donnell	
5437	Loren Lemos	
5438	Cam Rothnie	
5439	Devon King	
5440	María Lopez-Nunez	
5441	Karen Basurto:-Stra	
5442	jeannie stranzl	
5443	Yanzit Moctezuma	
5444	S B	
5445	Christy Lundy	
5446	mariah magee	
5447	Emily Schnipper	
5448	Alexandra Cole	
5449	Shirley Vitela	
5450	Mary Prescop	
5451	jonathan staufer	
5452	nik payne	
5453	Diane Yang	
5454	Lois Gutierrez	
5455	Marie Veek	
5456	Claire Barry	
5457	Alvira U	
5458	Linda Needles	

Comment Number	Name	Comment
5459	Cynthia Montoya	
5460	Olivia Lim	
5461	Laura Stebbins	
5462	Eileen Holtz	This is just disgusting! I've been angry with Waste Management ever since one of their trucks shattered my windshield! this ices the cake!!
5463	Kayla Troxclair	
5464	Kenneth Vaughan	
5465	Ginny Schneider	
5466	Regi Teasely, Ph.D.	California residents deserve to live in a non-toxic environment.
5467	Stephanie Batchelder	
5468	Claudia Ruck	How can people live with the knowledge that they are spewing death and destruction in all directions, including themselves? This has to be stopped NOW!

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October 25, 2013

To: State Department of Toxic Substances Control

From: Greenaction for Health and Environmental Justice

Re: Comments in Opposition to Draft Permit for Expansion of Chemical Waste Management Kettleman Hills Hazardous Waste Facility

Greenaction for Health and Environmental Justice submits these comments on the Department of Toxic Substances Control Draft Permit for the Chemical Waste Management (CWM) Kettleman Hills Hazardous Waste Facility on behalf of our members and constituents in Kettleman City, Avenal and other communities impacted by the operation of the CWM facility.

These comments will demonstrate that DTSC must deny Chemical Waste Management's application to expand the violation-plagued hazardous waste facility in the suffering, overly burdened and at-risk low-income, Latino and Spanish-speaking community of Kettleman City.

Kettleman City residents have suffered enough from pollution and environmental racism and injustice, and the health problems likely caused by pollution continue. The proposed expansion of hazardous waste landfills at the Chemical Waste Management Kettleman Hills Facility would add significant risks to the already over-burdened community of Kettleman City.

As a state agency mandated to protect public health and the environment, ensure compliance with the law including permits, and required to comply with and uphold civil rights laws and environmental justice policies and mandates, DTSC must deny new permits to Chemical Waste Management.

As set forth below, the analysis and documents justifying the issuance of the permit are based on faulty assumptions and findings, violate legal requirements, and moreover, reflect bad policy and set damaging precedent for DTSC's permitting program. The project applicant's past compliance history and the project impacts on nearby residents are so significant that they justify, and require, a permit denial.ch

I. The Chemical Waste Management Kettleman Hills Facility, the Community and Environment:

The Chemical Waste Management (CWM) facility is located approximately 3.5 miles southwest of Kettleman City. Diesel trucks carrying hazardous wastes and PCBs to the facility travel just yards from residential areas and near the Kettleman City School. According to the U.S. Census, some 96% of Kettleman City's population is Hispanic or Latino, and the per capita income of that population is \$15,081. People living in the communities surrounding near the facility are already living with

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significant respiratory health problems as the Central Valley, including Kings County, has worse air quality than any other region in the Nation. Kings County is in extreme nonattainment of current 8-hour and 1-hour ozone standards, and is in non-attainment of 24-hour and annual average fine particulate matter (PM 2.5) standards. Drinking water in the town is contaminated with benzene and arsenic.

Latinos and other people of color have a much greater exposure to environmental hazards – including air pollution, pesticide poisoning, lead poisoning, groundwater contamination and proximity to toxic waste facilities – than any other sector of our population. This holds true for Kettleman City residents, who must drink contaminated water, breathe air that is well over state and federal health-based standards, and live and work in an environment with numerous stationary and mobile pollution sources including the Chemical Waste Management hazardous waste, PCB and solid waste landfill, widespread pesticide use, massive diesel traffic on Interstate 5 and Highway 41, diesel truck transfer stations and idling hot spots, old oilfield contamination, current fracking and oilfield operations and a former PG&E toxic site.

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At the same, Latinos nationwide and in Kettleman City have the least resources to cope with this exposure, having less occupational and residential mobility, less access to health care, fewer financial resources, and less political power than almost any other sector of U.S. society. DTSC proposes to allow the continued and massively expanded dumping of toxic waste despite the disproportionate impact this will have on Kettleman City residents.

CWM proposes to expand its hazardous waste landfill B-18 both vertically and laterally– the expansion would increase the footprint of the landfill from 53 acres to 67 acres, and would increase the volume of the landfill from 9.7 million cubic yards to 15.6 million cubic yards. CWM plans to add another hazardous waste landfill (B-20) at the site once the B-18 expansion is complete.

CWM’s facility is already the largest hazardous waste facility in the West. The community has experienced elevated rates of birth defects in recent years, and agencies have repeatedly fined the facility for chronic and serious violations of hazardous waste laws and regulations. For example, the U.S. Environmental Protection Agency (“EPA”) and DTSC records show that over the years, CWM has repeatedly failed to report toxic spills, improperly disposed of PCBs and other hazardous waste, and failed to conduct required monitoring. CWM has demonstrated a pattern and practice of chronic and repeated violations at KHF, some spanning a period of several years.

If DTSC allows KHF to expand, it is almost guaranteed that CWM will continue to violate environmental laws and permits, and will negatively impact a low-income, community of color who the state admits is highly vulnerable to pollution and whose health is already heavily burdened by proximity to the landfill and other environmental pollution.

II. Applicable Laws Provide Legal Basis for Permit Denial– RCRA, CEQA, Title VI of the United States Civil Rights Act and California Government Code 11135:

A. CEQA and RCRA:

DTSC's permit decision is in part governed by the California Environmental Quality Act (CEQA) and the Resource, Conservation and Recovery Act (RCRA).

CEQA and RCRA give DTSC the authority to deny the permit due to the chronic violations and environmental and human health threats posed by this proposed expansion.

RCRA is supposed to provide protection of human health and the natural environment from the potential hazards of waste disposal and ensure the management of waste in an environmentally sound manner.

The California Environmental Quality Act requires state and local agencies within California to follow a protocol of analysis and public disclosure of environmental impacts of proposed projects and adopt all feasible measures to mitigate those impacts. CEQA makes environmental protection a mandatory part of every California state and local agency's decision making process. CEQA gives DTSC the authority to deny the permit due to the chronic violations and environmental and human health threats posed by this proposed expansion. Unfortunately and improperly, DTSC has made a mockery of CEQA by relying in significant part on an EIR prepared pursuant to CEQA through an illegal, blatantly racist and discriminatory process, and by failing to conduct a thorough and comprehensive of all potential impacts.

B. California Government Code 11135 and Title VI of the United States Civil Rights Act of 1964:

In addition to RCRA and CEQA, as a recipient of substantial state and federal funding, DTSC's permit decision must comply with and not violate state and federal civil rights laws, as the communities most directly and disproportionately affected by the DTSC decision are primarily Spanish-speaking and Latino, populations protected under California Government Code 11135 and Title VI of the United States Civil Rights Act of 1964.

As these comments and the public record make clear, the issuance of a permit would have a clear, discriminatory, negative and disparate impact on Latinos and Spanish-speakers, a protected class of people under our state's and nation's civil rights laws. In fact, even Kings County's racist EIR process had no choice but to admit and conclude that the proposed expansion of the landfill would have a negative and significant impact that could not be mitigated.

In addition, the defective public process for the DTSC comment period, the use of flawed and defective environmental studies to justify the permit issuance, the failure to conduct the promised and vitally important Cumulative Impact analysis, and the significant reliance on a boldly racist Environmental Impact Report process clearly resulted in a violation of state and federal civil rights laws.

III. DTSC/Cal EPA's Proposed Approval of the CWM KHF Expansion Violates State and Federal Civil Rights Laws:

The California Environmental Protection Agency, in designing its mission for programs, policies, and standards, must conduct its programs, policies, and activities that substantially affect human health or

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the environment in a manner that ensures the fair treatment of people of all races, cultures, and income levels, including minority populations and low-income populations of the state. Pub. Res. Code § 71110.

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin under any program or activity that receives federal financial assistance.

California Government Code, section 11135 prohibits discrimination on the basis of race, color or national origin under any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state. According to the California Code of Regulations, it is a discriminatory practice for an agency in carrying out any program or activity “to make or permit selections of sites or locations of facilities: that have the purpose or effect of excluding persons from, denying them benefits of, or otherwise subjecting them to discrimination under any program or activity.” 22 CCR § 98101(j)(1) (emphasis added).

DTSC must issue a permit before any toxic waste disposal facility can operate in California. Health & Safety Code § 25200. DTSC has issued permits to the three operating Class I toxic waste dumps in California, near Buttonwillow, Kettleman City and Westmoreland. All three of the host communities have the same demographics: overwhelmingly high percentages of Latino residents, of residents of Mexican descent, of farm workers, or poor families, and of people who primarily or only speak Spanish. See 2010 U.S. Census. Overall, Latinos comprise 32 percent of the state’s population, but Latino communities bear 100 percent of the risk and impact of hosting toxic waste dumps.

Additionally, a review of California commercial offsite hazardous waste facilities indicates that out of 55 total permitted facilities, DTSC approved 54 in areas with above average poverty rates or non-white populations.

The 1984 Cerrell Report, commissioned by the California Waste Management Board and funded with taxpayer dollars, set forth criteria and factors that encourages the siting of polluting facilities in low-income, Latino communities. That report implicitly advised companies and governmental entities to site waste facilities in small, poor, rural, Catholic communities with low education levels whose residents were engaged in extractive industries—a description that fits Kettleman City and the two other communities that host hazardous waste facilities in the State. The Cerrell Report explains that these communities are the least likely to oppose undesirable waste projects. The Report cautions that “[m]iddle and higher-socioeconomic strata neighborhoods should not fall at least within the one-mile and five-mile radii of the proposed site.”

DTSC’s practice of permitting hazardous waste landfills solely in low-income, Latino communities has a disproportionate impact and violates State and Federal civil rights laws. DTSC is well aware of the discriminatory impact of hazardous waste siting, yet continues to issue permits - even to chronic violators of permits like CWM - and exercises lax enforcement against violations.

A. DTSC's Approval of the KHF Expansion Would Violate California Government Code Section 11135.

California Government Code, section 11135 prohibits discrimination under any program or activity that receives any financial assistance from the state. An agency violates section 11135 if it receives state funding and takes an action that results in a significantly adverse or disproportionate impact on minorities. Unlike intentional discrimination claims, proving disparate-impact discrimination does not require a showing of discriminatory intent. To make a showing of disproportionate impact, statistical evidence of a kind and degree showing that the practice in question has negatively impacted minorities to a greater degree than non-minorities is sufficient.

DTSC is a state agency, and therefore receives state funding for all of its programs, including its permitting program. DTSC is the permitting authority for hazardous waste landfills in California. An operator cannot build a hazardous waste landfill or receive hazardous waste without a RCRA hazardous waste permit, issued by DTSC. Therefore, if DTSC approves the KHF expansion, it is directly responsible for the facility's impacts on nearby residents.

The facility has, and an expansion would have, a disproportionate and adverse impact on nearby residents. As acknowledged by the EIR, the project would have significant and unavoidable impacts. The project's significant and unavoidable air quality impacts would impact nearby residents to a greater degree than other populations.

In addition, the expansion would add 400 trucks transporting hazardous waste near or through Kettleman City each day. The 400 diesel trucks would add to the significant air quality burdens in the area and will exacerbate the extremely high levels of asthma in Kettleman City. Residents would be at greater risk of toxic exposures than other areas of the State due to accidental hazardous waste releases from the trucks or the disposal site. The close proximity of the hazardous waste landfill and constant threat of accidental toxic releases negatively impacts residents' mental health and sense of safety and well-being. The close proximity of the hazardous waste landfill and the presence of trucks constantly carrying hazardous waste through town would negatively impact property values in the town.

These impacts would disproportionately affect Latinos. According to the 2010 U.S. Census, Kettleman City is 96 percent Hispanic or Latino; Kings County is 52 percent Hispanic or Latino; and California is 38 percent Hispanic or Latino. "The basis for a successful disparate impact claim involves a comparison between two groups — those affected and those unaffected by the facially neutral policy." *Tsom-banidis v. W. Haven Fire Dep't*, 352 F.3d 565, 575 (2d Cir. 2003). In determining disparity, it is usually appropriate to measure the racial proportionality of the allegedly affected populations against the population of the agency's decision making jurisdiction. DTSC is a state agency and has decision-making jurisdiction over the entire state. To determine disparate impact, one need only compare the impacted community (96 percent Latino) with the rest of the State (38 percent Latino). Using this Census data, it is readily apparent that DTSC's approval of the KHF expansion would have a disparate and prohibited impact based on race when compared to the rest of the state.

DTSC's overall permitting of hazardous waste landfills also has a disparate impact on the basis of race. DTSC has permitted three hazardous waste landfills in California; one in Kettleman City, one in Buttonwillow, CA, and one in Westmoreland, CA. Buttonwillow is 78 percent Hispanic or Latino. And Westmoreland is 87 percent Hispanic or Latino. The population of the three communities together is 87 percent Latino. Comparing this Census data with statewide data, demonstrates that DTSC's approval of hazardous waste landfills in California disproportionately impacts Latino residents.

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Finally, DTSC's overall permitting of hazardous waste management units also has a disparate impact based on race. DTSC permits 55 commercial offsite hazardous waste facilities. These facilities are also predominantly permitted near areas with high Latino populations. Collectively, these communities have 76% more minority residents when compared to the rest of the state.

B. DTSC's Approval of the KHF Expansion Would Violate California Regulations:

1. DTSC Perpetuates King County's Discrimination

Decision-making about siting and regulating hazardous waste facilities is an integrated process, involving the facility operator, local, state, and federal agencies, including DTSC. DTSC, if it approves the KHF expansion, will perpetuate the disproportionate siting of hazardous waste facilities in low-income, Latino communities in California.

California law establishes that an agency is liable for perpetuating discrimination perpetrated by others. According to Title 22, Section 98101 of the California Code of Regulations, "[i]t is a discriminatory practice for a recipient, in carrying out any program or activity directly . . . on the basis of ethnic group identification . . . to utilize criteria or methods of administration that: perpetuate discrimination by another recipient on the basis of ethnic group identification. . ." 22 CCR § 98101(i)(3).

Kings County is a recipient of State funds. Here, DTSC perpetuates the discriminatory action of Kings County in citing the KHF expansion. Kings County issued a land use permit to Chemical Waste Management in an area where the facility will have a disproportionate impact on Latino residents. Kings County used a process that discriminated against its Latino residents. Most Kettleman City residents' first language is Spanish, and a high percentage of residents are monolingual Spanish speakers. In spite of Kettleman City residents' continued request and demand for documents in Spanish, the County provided documents in an English-only format. Kings County excluded Latino Kettleman City residents from the Local Advisory Committee considering the Kettleman Hills expansion. Kings County did not provide equal time for Spanish speakers to testify at the public hearing as English speakers. Kings County contracted with a large police and security force that had the effect of intimidating local residents and preventing them from participating in the decision-making process.

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DTSC relies on Kings County's discriminatory process to make its own decision on the hazardous waste permit. DTSC explicitly relies on Kings County's EIR that was the product of this discriminatory process. DTSC's decision to issue the permit is contingent and dependent on King's County's environmental review process.

To avoid perpetuating Kings County’s discriminatory conduct DTSC must 1) prepare its own environmental impact report using a process that does not discriminate against Latino residents; and 2) deny the permit for this particular location because of its disproportionate impacts on Latino residents. Only by denying this permit can DTSC prevent the disproportionate impact of Kings County’s decision.

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2. DTSC Discriminates Against Kettleman City Residents By Permitting the Selection of the Site of the KHF Expansion:

According to the California Code of Regulations, it is a discriminatory practice for an agency in carrying out any program or activity “to make or permit selections of sites or locations of facilities: that have the purpose or effect of excluding persons from, denying them benefits of, or otherwise subjecting them to discrimination under any program or activity.” 22 CCR § 98101(j)(1) (emphasis added).

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Here, DTSC did not itself select the KHF expansion site, but permitted the selection of a site that will subject Latino residents to discrimination on the basis of race and national origin. Under California regulation, this makes DTSC liable for the discrimination.

C. DTSC’s Violations of the California Health & Safety Code Has Led to Pervasive Patterns of Discriminatory Siting Statewide:

DTSC is directly responsible for providing statewide planning for hazardous waste facility site identification. According to Section 25170 of the California Health & Safety Code, “The department, in performing its duties under this chapter, shall . . . [p]rovide statewide planning for hazardous waste facility site identification and assessment. . .” Health & Safety Code § 25170. The legislature also specifically requires that DTSC prepare and adopt a state hazardous waste management plan to serve as a comprehensive planning document for the state. The state hazardous waste management plan requires DTSC to identify “areas or regions of the state where new or expanded capacity to manage hazardous waste are needed and the types of facilities that should be sited and constructed.” Health & Safety Code § 25135.9. The plan requires “a statement of goals, objectives, and policies currently in effect, or in the process of development, for the siting of hazardous waste facilities.” Id.

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The California legislature expressed its intent that the hazardous waste management plans prepared by or with assistance from DTSC “serve as the primary planning document for hazardous waste management at the local level; that the plans be integrated with other local land use planning activities to ensure that suitable locations are available for needed hazardous waste facilities; that land uses adjacent to, or near, hazardous waste facilities, or proposed sites for these facilities, are compatible with their operation.” Health & Safety Code § 25135.

The legislature required DTSC to approve the first plan by 1991, with revisions at least every three years thereafter. Health & Safety Code § 25135(b). However, DTSC has yet to complete any of the required statewide planning documents. Because DTSC has failed to comply with its statutory mandates in the Health & Safety Code, the State has no guidelines, standards, or plans that would

prevent waste disposal companies from targeting of low-income and minority communities for the most undesirable toxic waste facilities, a practice that is well documented.

DTSC is the only agency that is tasked with statewide management of hazardous waste disposal and has an obligation to prevent the disproportionate impacts of hazardous waste facility approval across the state through its general authority as well as the specific plans required by the Health & Safety Code. By failing to develop the required planning documents or using its general authority to prevent the targeting of Latino, communities, DTSC has contributed to the widespread discrimination against Latinos in hazardous waste facility siting decisions.

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D. DTSC’s Approval of the KHF Expansion Would Violate Title VI of the United States Civil Rights Act of 1964:

Title VI prohibits discrimination by recipients of federal funding. Section 601 provides that “[n]o person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

A claim under Section 601 requires a showing of discriminatory intent. However, circumstantial evidence of impact may prove intent. The Ninth Circuit has held that evidence of “gross statistical disparities” may be used to satisfy the intent requirement of a Title VI claim where the evidence “tends to show that some invidious or discriminatory purpose underlies the policy.” Though statistical evidence of discriminatory impact alone does not prove intent to discriminate, it, along with supporting circumstantial evidence, may be “considered in determining whether there is evidence of intent or purpose to discriminate.”

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Here, there is sufficient circumstantial evidence to infer discriminatory intent. This evidence includes:

- The vast racial disparities in where DTSC approves hazardous waste facilities in California.
- The Cerrell Report, commissioned by California, which provided private companies and governmental entities with criteria to determine which communities would be least likely to oppose undesirable land uses. The criteria described low-income, rural, Latino communities.
- DTSC has, in fact, permitted 100% of the State’s hazardous waste landfills in low-income, rural, Latino communities.
- DTSC’s preparation of a draft approval despite acknowledging that Kettleman City is in the top 10% of most vulnerable communities in California, factoring in demographic data and pollution sources.
- DTSC’s acknowledgment that it does not have any standardized criteria to determine when it is appropriate to deny a hazardous waste facility permit.

- DTSC’s preparation of a draft approval for the KHF prior to reviewing and implementing a report that it commissioned to critique its permitting program.
- DTSC’s failure to prepare required statewide hazardous waste planning that would determine appropriate siting criteria.
- DTSC’s oft repeated concerns that policies designed to prevent disproportionate siting decisions in California would lead to hazardous waste being disposed of out of state. This indicates that the agency believes that the only politically viable locations for a hazardous waste landfill are in areas with high minority populations.
- DTSC’s significant reliance in the permit decision on Kings County’s racially discriminatory permit process that top DTSC and Cal EPA officials themselves have denounced as unacceptable.

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In total, circumstantial evidence sufficiently demonstrates that DTSC has acted in the belief that permitting hazardous waste landfills is most feasible in low-income Latino communities; that California requires additional hazardous waste capacity; and that it must approve hazardous waste landfills in Latino communities in order to meet California’s hazardous waste capacity needs. This meets the standard for intentional discrimination.

E. DTSC’s Approval of the KHF Expansion Would Violate the Equal Protection Clause:

The Equal Protection Clause of the Fourteenth Amendment provides the primary constitutional cause of action available to remedy inequities. The constitutional prohibition on disparate treatment in this context prevents government actors from allocating environmental benefits and burdens on racial grounds. To prove a violation, plaintiffs must show that persons who are similarly situated are being treated differently (i.e., a disparate impact) and must also provide evidence of intent to effectuate the discriminatory practice.

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DTSC’s proposed approval of the KHF expansion and its larger pattern of issuing permits to hazardous waste facilities that target Latino communities violate the Equal Protection Clause.

IV. DTSC Improperly Relies on the State’s Scientifically Flawed “Environmental Exposure” Study to Incorrectly Conclude that Chemical Waste Management Facility Could Not Have Caused the Birth Defects Plaguing Kettleman City:

Possibly the most important document being used by the DTSC and other agencies to justify a massive expansion of the landfill and a dramatic increase in pollution associated with an expansion is the Environmental Exposure Study conducted by California EPA and many of its agencies.

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This state study was conducted by reluctant agencies with a historical and well-documented bias in favor of Chemical Waste Management, and was done only after the Governor ordered an investigation of the birth defects and pollution impacting Kettleman City. State agencies had earlier refused to investigate the birth defects until ordered to do so.

The controversial exposure study concluded that the emissions from the Chemical Waste Management hazardous waste landfill likely could not have caused the birth defects. We assert that the evidence clearly proves that the State study's conclusion was without basis in fact or science.

A. State Study Was Flawed and Misleading, and Compared Apples to Oranges:

The state's study was flawed and misleading and used improper evaluation methods to reach its conclusion.

The clear and unequivocal fact – ignored by the state agencies that did the study - is that actual operating conditions, monitoring and emissions at the Chem Waste landfill facility were dramatically different between the times the birth defects spiked in 2007 and when the testing and exposure study were conducted in 2010.

Despite this enormous discrepancy in disposal operations, the state improperly and unscientifically equated emissions when the facility operated at full capacity with emissions when it was operating at less than 5% capacity.

1. CWM was in full scale operation in 2007:

When the birth defects and infant deaths spiked in 2007, hazardous waste disposal operations at the Chem Waste landfill were at 100% normal levels and PCB dumping had soared:

- Hundreds of diesel truck trips going to and from the landfill were taking place daily
- Emissions from the full scale landfill operations were not being independently monitored on a daily or regular basis
- Chem Waste was producing faulty or unreliable laboratory results, as documented later by USEPA (and was the subject of enforcement action)
- Chem Waste had numerous other violations including illegal disposal of wastes and failure to conduct some of the required monitoring
- Shipments and disposal of PCBs, a banned substance that is a known reproductive toxin, had skyrocketed, probably due to the increased shipments from the PG&E Hunters Point power plant in San Francisco that was being demolished
- The PCB monitor had been turned off prior to the huge increase PCB disposal

2. CWM Operations Were Dramatically Reduced and at Less Than 5% of Capacity in 2010:

When the state conducted its environmental exposure study in early 2010, hazardous waste operations at the Kettleman Hills landfill were only about 5% of normal, down by over 95% when compared to 2007 when the birth defects problem erupted:

- The state's environmental exposure study negligently or intentionally failed to note the crucial fact that hazardous waste and PCB disposal activities at the landfill were at or near 100% of normal operations when the number of babies born with birth defects erupted in 2007, compared to less than 5% of normal operations when the testing and study took place in 2010.

- In a July 26, 2013 email from Wayne Lorentzen of DTSC to Bradley Angel of Greenaction, Mr. Lorentzen stated "... the Kettleman Hills hazardous waste landfill (B-18) had less than 5% of permitted capacity remaining in January 2010 by our estimates." This email is attached and incorporated into these comments as Exhibit A.
- It is clear that a landfill experiencing more than a 95% decrease in waste disposal transport and disposal activity would have dramatically less emissions than when it was operating at full capacity and normal operations.
- When the study took place in 2010, Chem Waste knew they were being monitored and watched closely by government, the media and the public, so they may have been more careful than usual during their operations – in contrast to their decades of well documented permit violations.

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3. State Study Was Biased Towards Chem Waste:

This flawed study was done by state agencies biased in favor of Chemical Waste Management, as evidenced by the refusal of state agencies to investigate the birth defects and infant deaths until ordered by the Governor to "investigate", and their decades of public statements defending the company's landfill operations at the same time that years of chronic and repeat violations were taking place.

It is a documented fact that the California Department of Public Health intentionally understated and withheld the true number of known birth defects, including in a presentation to the Kings County Board of Supervisors, until challenged with the true, accurate number by Greenaction and the Kettleman City community group El Pueblo Para el Aire y Agua Limpia/People for Clean Air and Water.

Another example of the state's pro-Chem Waste bias regarding this study, as we discuss elsewhere in these comments, is that DTSC and California EPA never even had a compilation of Chemical Waste Management's extensive and troubling compliance/violation history or provided one to the public until challenged by Greenaction on their failure to disclose this vital information.

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In addition, the state agencies never accounted for or evaluated the numerous violations committed by CWM in the state's evaluation of potential environmental impacts from the facility operation.

In conclusion, the state study was completely flawed and essentially compared apples to oranges and misled the public. The state study never acknowledged or mentioned the issues raised above, resulting in an enormous failure to consider crucial and relevant facts in reaching a conclusion.

While we agree that as of today no firm cause of the birth defects and infant deaths has been found, the state study did not prove that Chem Waste's activities could not have caused these terrible health problems and deaths and it is improper to rule Chem Waste out as a cause or contributor to the past or present profound health problems. The Kettleman City birth defect study did rule out genetics and lifestyle activities as possible causes, thus leaving pollution as the likely cause of the high number of birth defects.

V. State Is Breaking Its Promise to Reduce Pollution in Kettleman City:

At the conclusion of the state's inadequate and flawed investigation into the birth defects plaguing Kettleman City, state officials publicly announced a promise to the people of Kettleman City: the state would supposedly work to reduce pollution impacting Kettleman City.

It is a clear and unequivocal fact, admitted by Kings County and the State DTSC/Cal EPA, that approval of permits to expand the violation-plagued Chemical Waste Management hazardous waste and PCB landfill would increase pollution in the overburdened community of Kettleman City.

This broken promise is yet another example of the bias of state agencies who are willing to increase pollution in a community where they promised to reduce pollution, a community that the State itself admitted and documented is among the most vulnerable and at-risk communities in the state of California.

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VI. Discovery of New Childhood Leukemia and Many Adult Cancers, and other Ongoing Health Problems Affecting Residents:

Kettleman City residents have long suspected elevated levels of birth defects, infant deaths, cancer and other environmental health issues in the community may be tied to pollution sources such as the Kettleman Hills Facility. This concern was highlighted when residents, their community group El Pueblo and Greenaction discovered a large and unexplained number of birth defects and infant deaths.

Unfortunately, and wrongly, no government agency has ever conducted a comprehensive health survey in the town to determine the extent of health problems or to confirm or refute the belief that pollution may be causing high rates of illnesses and infant deaths.

Now, new information is now emerging that seems to confirm the existence of higher than expected cancers and other health problems in the community. DTSC should be aware of these problems and consider them prior to making a decision on the permit, as the new information appears to confirm once again that Kettleman City residents are suffering, vulnerable and at-risk and thus should not be exposed to a dramatic increase in hazardous waste transportation and disposal.

DTSC's approval of an expansion of the landfill would expose residents to decades of increased toxic pollution including breathing the emissions from hundreds of toxic waste trucks every day.

The State Department of Public Health continued to be ignorant of new cases of childhood cancer and has been oblivious and uninvolved in trying to determine the extent of unusual rates of cancer and miscarriages reported by residents. In addition, the state apparently dismissed reports of excessive rates of anemia by relying on "information" provided by Kings County, a county whose officials have been notorious for downplaying the birth defect/infant death problem and who are cheerleaders for more pollution in the county.

In the last few weeks, Greenaction joined with residents and their community group El Pueblo, and the Center on Race, Poverty and the Environment, and asked residents questions about health problems. This questionnaire was in response to alarming reports of large numbers of cancer cases on a single street in Kettleman City.

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In the last week we have also learned of a one year old baby who was apparently born with leukemia. This is not the first child in recent years with leukemia, a troubling development. Last November, a two year old died from leukemia. Adding insult to injury, the California Department of Public Health outraged residents by announcing there were no new cases of childhood cancer at the very same time this child was stricken.

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It would be completely irresponsible – and the breaking of a specific promise - for the state to approve a massive increase in pollution that would result from expanding the landfill in a community suffering profound illnesses that may be caused by the one or many of the pollution sources in and next to Kettleman City.

VII. State Should Have Investigated and Evaluated the Potential Impacts of Proposed Landfill Expansion and Construction Activities on Increasing Exposure to Valley Fever:

In August 2013, the issue of Valley Fever once again received prominent media and government attention when state prison officials decided to transfer vulnerable and at-risk inmates out of Avenal State Prison due to ongoing illnesses and deaths linked to exposure to Valley Fever. Avenal is just a few miles from Kettleman City and is also adjacent to Chem Waste.

The fungus that causes Valley Fever is in the soil of Avenal, Kettleman City and throughout the area.

When the fungus spores are sent airborne by the wind or other activities such as digging in the soil (as would occur with expansion of the Chem Waste hazardous waste and PCB landfill), people exposed to Valley Fever can get very sick, be stricken with permanent disabilities, and even die. People with weakened immune systems are particularly susceptible.

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The DTSC should have evaluated, and must evaluate, the potential impacts of proposed landfill expansion and the associated large scale construction activities that would occur on disturbing soil with the fungus that causes Valley Fever.

As the construction and operational activities associated with the proposed landfill expansion would disturb the soil and likely result in an increase in the airborne fungus associated with Valley Fever, it would be irresponsible to approve the expansion that almost certainly would cause more Valley Fever among residents already suffering a wide range of serious health problems. In fact, prisoners incarcerated in Avenal are also close to the CWM facility and the permit decision should consider the potential impact of landfill expansion construction on inmates who are already experiencing severe health impacts from Valley Fever.

It is a sad commentary, and a huge flaw in the DTSC permit analysis, that the state seems to care more about the impact of Valley Fever on the health of prisoners than on the people of Kettleman City and Avenal whose happen to live next to a giant hazardous waste landfill run by a giant corporation with friends in high places.

Both prisoners and residents have a right not to be exposed to Valley Fever.

VIII. Kings County’s EIR Concluded that Expansion of the Landfill Would Have Significant, Negative and Unavoidable Impacts that Cannot Be Mitigated:

The DTSC/Cal EPA would violate its environmental justice and civil rights mandates and the public promise made by state officials to reduce pollution in Kettleman City by approving an expansion, as even the biased Kings County Environmental Impact Report found that the proposed dump expansion would have significant, negative and unavoidable impacts that could not be mitigated. As a result of their finding of such a significant negative impact that could not be mitigated, the county had to adopt a Statement of Overriding Consideration – a statement itself flawed and inaccurate.

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Even if all feasible mitigation measures are imposed, the EIR concluded that the landfill expansion would significantly increase ozone, fine particulate matter (PM 2.5), coarse particulate matter (PM 10) emissions, result in a significant and unavoidable increased cancer risk at the facility boundary, significantly increase traffic impacts, and contribute to cumulatively considerable and significant greenhouse gas emissions.

Adding insult to injury, only about 3% of the hazardous waste disposed of at the facility is generated in Kings County, more concrete proof that the approval of a landfill expansion would disproportionately and negatively impact the Latino residents of Kettleman City, in violation of state and federal civil rights laws that DTSC is required to comply with.

DTSC should reject the permit to expand due to the clear fact that this proposed project would have a significant, negative and unavoidable impact that cannot be mitigated, as even the pro-Chem Waste Kings County EIR process determined.

IX. DTSC is improperly and illegally relying in significant part on a flawed EIR prepared by King County that was approved through blatantly racially discriminatory hearing rules and the use of police dogs, police intimidation and police violence:

The DTSC Draft Permit decision improperly relies heavily and significantly on the flawed and racially discriminatory process used by Kings County to produce the “Environmental Impact Report” for the proposed hazardous waste facility expansion.

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It is a matter of public record, as documented in the transcript of the Kings County Planning Commission “hearing,” that Kings County used blatantly and racially discriminatory rules, procedures and actions that violated the public’s right to participate in the permit process. These violations were startling, on their face racially discriminatory and intentional, and of a nature that resembled the Jim Crow-style systemic racism used in the Deep South and elsewhere to deny African Americans the right to vote and exercise their democratic rights.

A. Specifically, Kings County rammed through the defective EIR in order to approve a Conditional Use Permit for Chem Waste using the following racially discriminatory and unjust procedures, rules and actions:

- The “hearings” were marred by the large multi-agency police presence and the placement of police dogs in front of the hearing room, specifically designed to attempt to intimidate opponents of the hazardous waste landfill;
- Spanish speaking Kettleman City residents were given half the time to testify as English speakers brought in from out of town by Chem Waste to pack the hearing;
- When residents and advocates objected at the start of the hearing, residents and Greenaction’s Executive Director were threatened by county officials with removal by the police;
- When Ramon Mares, a Spanish-speaking Kettleman City resident and grandfather who is also a United States citizen, objected to the racist testimony rules, he was assaulted by numerous police officers and dragged out of the hearing and barred from testifying or attending the rest of the so-called public hearing;
- Police also knocked Mary Lou Mares, a grandmother with health problems, to the ground;
- Hundreds of Waste Management workers who had never worked at the landfill were shipped in to the first hearing held by Kings County on the EIR to pack the room, take up valuable public hearing time, make comments that were not relevant to the decision – and these workers had an intimidating effect on residents;
- Kings County refused to translate any of the permit documents into Spanish, making it virtually impossible for most residents to understand or comment on the proposed EIR;
- The EIR hearings were held in Hanford, not Kettleman City, making it difficult for the people most affected by the EIR and permit decision to attend and participate due to the distance needed to travel to the hearing and the fact that working people with families would be hard pressed to get home from work, feed their families and travel all the way to Hanford in time for the hearing.

B. Top DTSC and Cal EPA officials agree Kings County’s procedures were “unacceptable” but DTSC still relies on the Kings County study:

In a meeting with dozens of community and environmental justice advocates in front of the California EPA building on October 9, 2013, DTSC Deputy Director of Enforcement Brian Johnson stated that Kings County’s use of racially discriminatory public comment processes that gave Spanish-speaking residents half the time to testify as English speakers was “unacceptable.” We completely agree with Mr. Johnson of DTSC.

At the same meeting, California Environmental Protection Agency Assistant Secretary for Environmental Justice and Tribal Affairs Arsenio Mataka – the state’s top official responsible for

environmental justice policy – stated that in response to these concerns, a new state law was passed requiring that non-English speakers be given the same time to testify as English speakers.

C. DTSC is thus improperly relying in significant part on the Kings County EIR that was produced with what DTSC admits was an “unacceptable” process and a process that is now prohibited by state law:

Despite the new state law prohibiting the very type of racially discriminatory procedures used by Kings County, and despite DTSC Deputy Director Johnson’s public denunciation of Kings County’s discriminatory procedures in the EIR process, the DTSC’s draft permit decision relies significantly on that very study that was produced by racially discriminatory rules and police intimidation that made a mockery of the public’s right to meaningful participation in the process.

As DTSC is required to provide meaningful opportunities for public participation to the affected public regardless of the color of their skin or the language they speak, and as DTSC is subject to state and federal civil rights laws, the DTSC must not rely in any way, large or small, on the Kings County EIR that was approved with a process that was explicitly, blatantly and illegally discriminatory and unjust.

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X. DTSC’s “Environmental Justice Review” Document Fails to Analyze Environmental Justice Issues and Promotes Environmental Injustice:

One of the DTSC permit documents used to justify its draft decision to approve the proposed landfill expansion is entitled “Environmental Justice Review.”

DTSC claims it “...prepared this Environmental Justice Review to identify and address environmental justice concerns related to the Kettleman Hills Facility operated by Chemical Waste Management, Inc. (Applicant). The Environmental Justice Review also assesses the potential harmful offsite impacts from the facility as well as existing environmental burdens on the people in the community. Finally, this document reviews authoritative and voluntary actions taken by DTSC, local government, federal government, and the Applicant to address impacts on the people in the community from the facility or from the multiple impacts of other activities. This review is informed by the policies set forth in Government Code section 11135, Public Resources Code sections 71110-71113, California Environmental Protection Agency (Cal/EPA) Environmental Justice Action Plan (2004), and DTSC’s own policies for environmental justice.”

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However, DTSC’s so-called “Environmental Justice Review” is in reality a document that promotes environmental racism due to inaccurate analysis, the omission of key information that should have been analyzed, and the unethical and inappropriate use of certain information.

Specific inaccuracies and defects in DTSC’s “Environmental Justice Review” include:

- This review failed to identify or address environmental justice concerns related to the Kettleman Hills Facility, and in fact no concerns were addressed by DTSC;
- Contrary to DTSC’s claim, this review does not include an assessment of Cumulative Impacts, and the assessment of “potential harmful offsite impacts from the facility as well as existing

environmental burdens on the people in the community” that DTSC claims is in the review is simply not in this document;

- Even if the information about assessing harmful impacts was in this review, a real Cumulative Impact Assessment and analysis would include the toxic waste facility, other existing environmental hazards, proposed environmental hazards and existing and recent health and environmental quality information – this DTSC “Environmental Justice Review” failed to analyze these issues cumulatively if at all;
- It was completely improper, and a biased attempt to justify dumping more hazardous waste and PCBs on Kettleman City, for this document to review “...authoritative and voluntary actions taken by DTSC, local government, federal government, and the Applicant to address impacts on the people in the community from the facility or from the multiple impacts of other activities.”

These voluntary actions are irrelevant to a permit decision that should be based on facts and the law, not on a giant corporation using its vast wealth to greenwash their polluting operations and attempt to win the support of residents;

- A major flaw is that DTSC cites various incentive programs and the US Environmental Protection Agency Environmental Justice Small Grant that was given to Greenaction to reduce diesel pollution from illegal truck idling in Kettleman City - and DTSC mentions this grant as grounds to support granting Chem Waste its permit. This is unacceptable. As the State says it wants to provide more funding for highly impacted communities to remediate past disparities based on the CalEnviroScreen tool, this cannot be used as grounds to permit additional disproportionate impacts. The goal of the tool and of those who participated in its creation is to reduce impacts in these highly impacted communities;
- DTSC’s claim that “To address the issue of air pollution, the Applicant has agreed to an enforceable plan to reduce diesel truck emissions ...” is absurd and Orwellian, as the DTSC is proposing to allow a **massive increase** in diesel truck traffic and diesel emissions;

If the expansion is approved, diesel truck trips carrying hazardous waste will increase from the current level of approximately one per day to about 400 per day. Using cleaner, but not clean, diesel vehicles will in no way “address the issue of air pollution” as DTSC claims and will not result in cleaner air and less diesel emissions;

The only way to truly reduce diesel emissions is to reject the expansion, and make sure that there are not 399 more diesel truck trips per day more than are currently occurring.

- DTSC’s claim that they are addressing the long-standing issue of water quality and the lack of a safe drinking water supply for Kettleman City residents is also absurd, as DTSC knows very

well that the people of Kettleman City drink, bathe and wash in toxic contaminated water every day and have done so for decades;

- In the section on “Public policy basis for environmental justice consideration in the permitting process,” DTSC writes that “Environmental justice is defined in California law (Government Code, section 65040.12) as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws and policies.”

DTSC is absolutely correct that there is a public policy and legal basis for environmental justice consideration in the permitting process, but the draft decision to permit a massive expansion of a violation plagued hazardous waste facility in an overburdened, vulnerable and suffering community whose residents have faced Jim Crow-style racism in the permitting process for this project is a clear violation of environmental justice and civil rights;

- The discussion of air quality in this “review” focuses on air monitoring requirements, but fails to mention anywhere the undeniable and well-documented fact that CWM has violated some of its permit requirements on monitoring, including for years at a time. Essentially the DTSC details a wishful thinking, make-believe world where CWM complies with its permit and does all the required monitoring and reporting;
- The “review” mentions US EPA’s Air Emission Study on KHF Ponds, which despite being based on a one day (November 12, 2010) inspection , allegedly indicated “... that the Kettleman Hills Facility did not appear to be a significant source of the measured compounds at the time of inspection.” The use of a one day inspection to conclude that the facility was not a significant source of measured compounds at the time of inspection is not a representative sample to make any conclusions;
- The DTSC “review” cites the “ US EPA KHF PCB Congener Study”, yet this study allowed a toxic polluter with a serious record of violations, including failing to report spills and failing to conduct some of the required monitoring, to conduct most of the testing;
- DTSC’s “review” cites the “Cal EPA Kettleman City Community Exposure Assessment” ordered by Governor Arnold Schwarzenegger in January 2010 which directed Cal EPA to assess possible environmental contaminants in the air, groundwater and soil that may have contributed to the increase in birth defects in the Kettleman City community since 2007.

We discuss the enormous scientific and technical flaws with this study elsewhere in these comments, but once again DTSC failed to point out that the pollution and waste disposal activities at the landfill were reduced by over 95% at the time the study took place compared to the full operations taking place several years earlier when the spike in birth defects took place;

- DTSC's "review" cites the state's birth defect study, but omits key information including the clear fact that the state knowingly and intentionally understated and withheld the true number of birth defects. DTSC's "review" also failed to mention the state agencies had refused to investigate until the Governor ordered an investigation in the wake of major national news coverage;
- DTSC's "review" correctly states that "Environmental justice requires not only fairness in the distribution of environmental and public health burdens and benefits, but also access to government's process for making decisions affecting environment and public health."

However, DTSC violated this very clear mandate and requirement in many ways, most blatantly in relying in significant part on Kings County's EIR that was approved using Jim-Crow style racism including police intimidation and racially discriminatory hearing rules.

As DTSC has publicly acknowledged that Kings County's actions were unacceptable, DTSC improperly is using that EIR to partly justify its draft permit decision;

- DTSC's review correctly discusses and provides information on the findings of the state's own CalEnviroScreen cumulative impacts tool and study, which concluded that "The population characteristics indicators show that residents may be more vulnerable to the effects of pollution." As an expansion of the landfill would clearly result in more pollution and thus more of an impact on an already vulnerable community, the state should use the information in CalEnviroScreen to reject, not approve, the permit;
- It is an outrage that the DTSC included in its so-called "Environmental Justice Review" actions proposed to be taken by a giant corporation that has repeatedly violated its permits to essentially buy off and sway public opinion. These include paying for a walking track, soccer field lighting, pavilion, and parking lot at the Kettleman City Elementary School. Children's ability to participate in sports should not be dependent on money from a company that dumps hazardous wastes and PCBs next to their town and has a terrible compliance history;
- DTSC's mention of funds that may be provided by Chem Waste to help pay off the water service debts of the Kettleman City Community Services District is improper, as many now believe that the only way Kettleman City will get a new and safe water supply is if the dump expands. This is an unethical way to garner support for a toxic waste landfill, essentially sending a message to residents that if you want clean water for your family and babies, you must allow more toxic waste to be disposed of in your town.

XI. DTSC Proposed Approval of Toxic Dump Expansion Ignores Cal EPA's CalEnviroScreen Cumulative Impact Methodology Which Proves Kettleman City Residents Are Highly Vulnerable and At-Risk From Additional Pollution:

In April of 2013, the California Environmental Protection Agency, along with the Office of Environmental Health Hazard Assessment, released a science-based tool (California Communities Environmental Health Screening Tool, the “CalEnviroScreen”) for evaluating multiple pollutants and stressors in communities for use by its boards, departments, and office. The tool shows which areas of the state have higher pollution burdens and vulnerabilities than other areas. The tool uses environmental, health, demographic and socioeconomic data to create a screening score for communities across the state.

Contradicting the findings, and purpose, of CalEnviroScreen, DTSC is proposing to approve a massive expansion of a problem-plagued hazardous waste landfill in a community that the state’s own CalEnviroScreen methodology found is one of the most at-risk and vulnerable communities in the state.

The DTSC’s “Environmental Justice Review” (pages 18-19) states the following about the findings of CalEnviroScreen regarding Kettleman City (emphasis added):

“CalEnviroScreen identifies which portions of the state have higher pollution burdens and vulnerabilities than other areas. It examines indicators related to exposures, environmental effects, sensitive populations, and socioeconomic factors. ***The Kettleman City census zip code is identified as in the top 10% highest scoring census zip codes in the state based on these indicators, which indicates a comparatively high level of pollution burden and vulnerability.***

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For the purposes of this analysis, we compared Kettleman City to two neighboring communities, Lemoore and San Miguel, examining the raw data identified by CalEnviroScreen for their respective pollution burden and population characteristics indicators. The table on the next page provides CalEnviroScreen data for the Kettleman City zip code, a nearby zip code in Kings County, and a nearby zip code in a community to the southwest of Kettleman City. The indicators show how residents of Kettleman City compare to the other communities across the 18 CalEnviroScreen indicators.

The pollution burden indicators show that residents of Kettleman City may experience comparatively higher impacts. Although some indicators are not present or show lower burdens, other indicators show high burdens. The ozone indicator shows that the portion of the daily maximum 8 hour ozone concentration over the federal standard is about 0.11. The average PM2.5 air pollution is 14.1 and exceeds US EPA’s standard for ambient PM2.5 concentration. Use of pesticides filtered for hazard and volatility in the area is much higher than the two comparison zip codes, with 3,706.2 pounds reported. In addition, hazard-weighted pounds of chemicals from toxic releases are 39,120,229. Unlike the two comparison zip codes, CalEnviroScreen does not identify impacts from cleanup sites or groundwater threats for the Kettleman City zip code.

The population characteristics indicators show that residents may be more vulnerable to the effects of pollution. The educational attainment indicator shows that 57.2% of the population has less than a high school education. This percentage is significantly higher than the two comparison zip codes.

The linguistic isolation indicator measures the percentage of households where no one speaks English “very well,” and identifies 23.6% of households in Kettleman City as in this category. This percentage is also significantly higher than the two other comparison zip codes. Kettleman City is also high on the tool’s measure of poverty, with 39.8% of the population living below twice the federal poverty level. The percent low birth weight in Kettleman City, 6.03%, is comparable to the two comparison zip codes. Finally, CalEnviroScreen identifies 96.27% of the population of Kettleman City as non-white or Hispanic/Latino, significantly higher than the two comparison zip codes.

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The data from CalEnviroScreen are useful for understanding the multiple pollution sources present in the Kettleman City census zip code. They are also valuable in understanding how the zip code compares to other zip codes in the state. Finally, they provide a way to assess the community’s relative vulnerability to those pollution sources, particularly in light of emerging scientific research indicating that the relationship between pollutant exposure, stress, and health outcomes can vary based on the race and ethnicity of the population.”

We incorporate into our comments the chart starting on page 19 of DTSC’s “Environmental Justice Review” documenting population characteristics and pollution burdens in Kettleman City.

XII. DTSC Improperly Failed to Consider or Evaluate Cumulative Impacts to Assess True Impacts of Proposed Expansion of the Hazardous Waste Facility:

DTSC’s Environmental Justice policy states that DTSC will “minimize potential cumulative impacts from facilities and sites on community health and the environment by significantly reducing exposure risks from individual sites.” Even though DTSC acknowledges that Kettleman City residents face a cumulative risk from multiple pollution sources, it does little to identify the nature of those impacts or address them.

As discussed in more detail below, DTSC’s entire cumulative impact analysis consists of listing new or proposed projects that have emerged since Kings County certified its EIR for the project and summarizing any existing CEQA documentation for the new projects. DTSC did not analyze the combined impact of multiple environmental stressors in the area, and certainly did not minimize potential cumulative impacts by significantly reducing exposure risks from individual sites.

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DTSC is well aware of the widespread concern over cumulative impacts in Kettleman City. In fact, during her confirmation hearing, members of the legislature explicitly asked DTSC Director Debbie Raphael to explain how she planned to address cumulative impacts. The Director responded that “we need to take additional information into account, look at what other facilities have been cited around the Kettleman community, look at the issue of birth defects, look at pesticide exposures, to try to have an idea of what - - paint a picture of the reality of the situation for the residents of Kettleman, and how does the facility play into that. And that’s part of the additional work that we are working on right now.”

Despite Director Raphael's explicit promise to conduct a cumulative impact study, and despite CalEnviroScreen's identification of Kettleman City as a very at-risk and burdened community, DTSC failed to conduct a cumulative impact analysis for their permit decision.

DTSC's alleged cumulative impact analysis is a far cry from what the Director promised the legislature and fails to evaluate the cumulative impacts at all. The analysis did not "look at the issue of birth defects," did not "look at pesticide exposures," and did not "paint a picture of the reality of the situation for the residents of Kettleman and how does the facility play into that."

Outside the CEQA context, Cal/EPA defines cumulative impacts to mean exposures, public health or environmental effects from the combined emissions and discharges, in a geographic area, including environmental pollution from all sources, whether single or multi-media, routinely, accidentally, or otherwise released. Impacts will take into account sensitive populations and socioeconomic factors, where applicable and to the extent data are available.

DTSC prepared an Environmental Justice Review "to identify and address environmental justice concerns related to the Kettleman Hills Facility. . ." EJ Review at 4. The document "review[ed] authoritative and voluntary actions taken by DTSC, local government, federal government, and the Applicant to address impacts on the people in the community from the facility or from multiple impacts of other activities." Id. DTSC "acknowledges the multiple environmental pollution burdens borne by the Kettleman City community, and the presence of poverty, language barriers and other factors which tend to make those people vulnerable to the impacts of pollution." EJ Review at 4. However, DTSC does not address the cumulative impacts associated with its permit decision. Rather DTSC describes residents' concerns and summarizes ongoing activities by itself and other agencies that are completely independent of and unrelated to the facility and the ultimate decision.

For example, DTSC lists 1) agreements made by the company pursuant to the Tanner Act process, 2) EPA's prevention of pesticide exposure project to educate local residents; 3) EPA's Diesel Truck Emissions grant to Greenaction for Health and Environmental Justice; and 4) plans for a new drinking water source. Many other cited actions are merely inconclusive studies with no associated pollution reductions. All these activities would have occurred even without DTSC's approval of the proposed facility. Yet DTSC relies upon these activities in an attempt to mitigate the significant cumulative impacts from the proposed KHF expansion.

DTSC risks stifling improvements and positive programs for vulnerable areas if it relies upon them as justification for permitting undesirable land uses. DTSC must address cumulative impacts from the KHF expansion by significantly reducing exposure risks from that individual site, not by reliance on the positive steps that are already being taken in the community. Where, as here, cumulative impacts are so severe, the only way to acceptably reduce the cumulative risk presented by the KHF expansion is to deny the permit.

During the DTSC phone briefing on July 2, 2013 about their draft permit decision, Director Raphael stated that the promised cumulative impact study was actually part of the DTSC's permit document entitled "Environmental Justice Analysis." However, a comprehensive cumulative impact analysis is not in that document or in any other permit document.

The permit documents do contain a listing of many of the multiple pollution sources impacting Kettleman City, but this list is incomplete and completely fails to evaluate the combined cumulative impact of all these existing and proposed pollution sources on a community the state itself admits is highly vulnerable. A list of pollution sources is not a cumulative impact analysis.

The permit documents do include valuable and highly relevant information compiled by Cal EPA in their cumulative impacts analytical tool and methodology, the CalEnviroScreen, and this model and tool resulted in the state ranking Kettleman City in the top 10% of the most vulnerable and at-risk communities in the state to pollution.

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DTSC is thus making a mockery of CalEnviroScreen by approving a massive increase in pollution at the same time acknowledging that this community is highly vulnerable and after promising to reduce pollution impacting this suffering town.

The failure to conduct a comprehensive cumulative impact study of the potential impacts of expanding the toxic waste landfill combined with existing and other proposed pollution sources in this community already suffering high rates of serious health problems has resulted in inadequate analysis of the potential and real impacts of the proposed expansion.

XIII. DTSC Erred in Refusing to Conduct Biomonitoring of Residents:

Despite repeated and public requests from residents including mothers who had babies with birth defects, the state erred by refusing to conduct biomonitoring of residents to determine the extent of toxic contaminants in their body. This testing could possibly have identified possible links between certain types of pollutants coming from specific pollution sources and health problems being experienced by mothers, babies, kids and other residents.

According to the California Department of Public Health, “Biomonitoring is the measurement of chemicals (or their metabolites) in a person’s body fluids or tissues, such as blood or urine. It tells us the amount of the chemical that actually gets into people from all sources (for example, from air, soil, water, dust, and food) combined. Because of this, biomonitoring can provide useful information on how much exposure to toxic chemicals a person has had.”

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Because of the multiple pollution sources, it is important for Kettleman City residents to know how much exposure they have compared to other areas of the state. Even if the biomonitoring was unable to pinpoint a single source, the information about cumulative impacts from living near so many pollution sources is important, especially in the face of DTSC’s proposed decision to approve yet another pollution source.

Residents have long requested that the State conduct biomonitoring to help determine whether unexpected chemicals are in their bodies, yet these requests have been repeatedly rejected or ignored.

At her confirmation hearing, Senator Alquist questioned DTSC Director Debbie Raphael specifically about her commitment to conduct biomonitoring in Kettleman City. The following dialogue occurred during the Senate confirmation hearing for Debbie Raphael:

Ms. Raphael: . . . You are correct in saying biomonitoring has not been offered to the residents of Kettleman. What I will commit to and am excited to do is to go deeper into the why on that and to work with the Department of Public health to ask the question: Is this an appropriate place for biomonitoring? If not, why not? Let's talk to the community members, bring them into the conversation to get a realistic view of what could biomonitoring – how could it help: what kind of information could it give to the community members that they don't already have. The idea of finding out what's in their bodies, can we link it to anything in the environment, are the chemicals that they're being exposed to even - - sorry- - contained in their bodies, that some of the pesticides won't be picked up in biomonitoring, is what I want to say.

Senator Alquist: Would you commit to, in the next three months, asking these questions?

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Ms. Raphael: I will.

Senator Alquist: And at that point, putting out a statement after you evaluate the answers to those questions, stating either specifically why biomonitoring would not be a good thing to use in Kettleman City, or why it would be to implement the process.

Ms. Raphael: Yes. I would...I'm committing to do what you say.

However, DTSC has not put out a formal statement on whether biomonitoring would be a good thing to use in Kettleman City. DTSC has not talked to the community members to get a realistic view of how biomonitoring could help provide residents with information that they do not already have.

XIV. Permit Must Be Denied Due to CWM's Dismal and Well-Documented Compliance History of Chronic, Repeat and Serious Violations:

DTSC admits in their so-called "Environmental Justice Review" permit document that "it is DTSC's responsibility to ensure the facility does not pose a health risk to the community, and operates within the requirements of its hazardous waste permit."

It is a matter of public record, and an undeniable fact, that Chem Waste has frequently been in repeat, chronic and often ongoing violation of its hazardous waste permit often for years at a time. It is a mockery of reality for DTSC to pretend that somehow all of a sudden Chem Waste will operate within the requirements of its permit.

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DTSC and other agencies must reject the proposed permit due to the fact that Chemical Waste Management has a long track record of serious, repeat and chronic violations of their permits regarding handling and disposal of hazardous wastes and PCBs at the Kettleman Hills Facility.

In the last few years alone, Chem Waste has been cited for violations including years of illegal disposal of hazardous wastes and PCBs, years of failing to conduct some of the required monitoring, failing to report 72 spills of hazardous waste over a four year period, and faulty laboratory results.

These chronic violations clearly are grounds for a permit denial, yet the state's decision to issue a draft permit sends a message to polluters that they can violate their permit dozens of times as Chem Waste has, yet still get new permits.

A. DTSC Should Deny the Permit Based on Chemical Waste Management's Repeating or Recurring Pattern of Violations and Noncompliance:

The KHF expansion project takes place against a backdrop of repeated environmental violations and fines for failure to meet basic operating standards. Agencies have fined Chemical Waste Management millions of dollars for violations at KHF since it was built, and continue to issue fines to the company as recently as this year.

Chemical Waste Management has been fined repeatedly for violations at KHF. In 1984, EPA fined Chemical Waste Management \$2.5 million for a total of 130 violations. Among other incidents, Chemical Waste Management was charged with allowing leaks from the dump to contaminate local water supplies. In 1985, EPA and Chemical Waste Management's parent company, Waste Management, Inc., agreed to a consent decree involving \$4 million in fines for failing to adequately monitor ground water and for mishandling hazardous waste, including PCBs, at the Kettleman Hills dump. In 2005, EPA and Chemical Waste Management entered into a consent decree for extensive monitoring violations. The California Department of Health Services fined Chemical Waste Management \$363,000 for eleven administrative and operational violations at the Kettleman dump.

Agencies have consistently and continually levied violations and fines against Chemical Waste Management. For example, on April 8, 2010, EPA issued Chemical Waste Management a letter outlining that the company was engaged in improper disposal and improper handling of highly toxic materials. And, on May 27, 2010, EPA Region IX issued a Notice of Violation to Waste Management stating that, "the data quality control system at the KHF Laboratory is not adequate to ensure reliable analytical results," and "should not be used for decision making." On March 2013, DTSC fined Chemical Waste Management \$311,194 for 72 violations for failing to report hazardous waste spills on its property during a four year period between 2008 and 2012.

Health & Safety Code, Section 25186 authorizes DTSC to deny or revoke a permit based on violations of or noncompliance with environmental protection statutes and regulations, if the violation or noncompliance shows a repeating or recurring pattern or may pose a threat to public health or safety of the environment. Moreover, Title 22 of the California Code of Regulation, Section 66270.43 authorizes DTSC to revoke or deny a permit for noncompliance by the applicant with any condition of the permit.

In response to a question about whether Chemical Waste Management's enforcement record was taken into account in the draft permit modification decision, DTSC explained that "DTSC carefully reviewed the facility's entire enforcement record, dating back to 1983 and concluded that none of the violations threatened public health or the environment." DTSC FAQ. By considering only whether violations threatened health and the environment, DTSC applies the wrong standard. Pursuant to Health & Safety Code Section 25186, DTSC must consider whether violations of or noncompliance with environmental protection statutes and regulations shows a repeating or recurring pattern. This

consideration is in addition to and separate from its consideration of whether the violations pose a threat to public health or safety of the environment.

We also challenge DTSC's claim that none of the violations threatened public health or the environment. For example, DTSC was unaware of CWM's failure to report 72 spills spanning a four year period – and unaware of the spills – until they discovered the violations after the fact. In reality, DTSC has absolutely no independent, verifiable evidence to assert these spills and the failures to report them (as required by CWM's permit) did not threaten public health. These incidents very likely could have posed a serious health threat to company workers or even to school kids that CWM tries to bring on picnics to the hazardous waste facility.

In addition, it is absurd for DTSC to claim that the failures to conduct required monitoring, or relying on unreliable laboratory testing, or illegally disposing of hazardous wastes and PCBs do not in any way threaten public health.

In a separate document, DTSC provides a different answer to how the agency considered the compliance history of the KHF. DTSC explains that its enforcement review "concluded that the facility is not a serial violator as there have been long stretches of time without violations." This is factually incorrect as Chemical Waste Management has not gone any substantial period of time without violating statutes, regulations or its permits, as demonstrated above. Additionally, DTSC's interpretation of its authority is contrary to the plain language of the statute, and constitutes the setting of an underground regulation without first complying with the California Administrative Procedure Act. According to DTSC's new interpretation of what constitutes a pattern or practice of violations, an applicant would have to violate statutes, regulations or permits at consistent time intervals for the entire life of the project. This is an arbitrary interpretation of what constitutes a repeating or recurring pattern of noncompliance, renders Health & Safety Code Section 25186 virtually meaningless, and sets up very dangerous precedent for other facilities across the state.

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By any reasonable measure, Chemical Waste Management's violations and noncompliance show a repeating or recurring pattern. By sheer number: DTSC and other agencies have issued hundreds of violations against KHF. By timeframe: the violations span 30 years. By consistency: KHF has operated for 30 years; in 24 of those years, it has been found in violation of statutes, regulations or its permits at least once. By continuity: the facility has continued to violate statutes, regulations, and its permits even as it seeks this expansion. In fact, some of the facility's largest fines have been issued within the last two years, after it filed its permit application with DTSC.

Compliance histories as compiled by DTSC and USEPA are attached to and incorporated into these comments as Exhibits B, C, D and E. The November 8, 2012 email from US EPA to Greenaction with RCRA and TSCA compliance/violation histories (attached and incorporated into these comments) confirms that their compilation is incomplete, but they clearly show an ongoing and chronic pattern of violations that justify a permit denial.

B. DTSC Should Deny the Permit Based on Chemical Waste Management’s Violations of its Permit:

DTSC ignores other regulatory authority that allows it to deny a permit based on noncompliance by the applicant with any condition of a permit. See 22 CCR § 66270.43. DTSC has previously considered what types of violations are sufficiently significant so as to support a permit denial. Examples include:

- (a) failure to install an adequate environmental monitoring system;
- (b) failure to construct the facility properly, for example, inadequate containment systems; inadequate run-on/run-off collection systems; systems that do not meet seismic and precipitation design standards; or use of construction materials that are incompatible with waste being handles; and
- (c) failure to manage waste handles at the facility properly, e.g., failure to comply with waste analysis requirement; failure to maintain adequate security; improper handling of incompatible reactive or ignitable wastes; or spillage of wastes onto soil.

Agencies have issued violations against Chemical Waste Management that would fall under each of these categories:

a. Monitoring violations

EPA and DTSC have issued violations to Chemical Waste Management for failure to implement a groundwater monitoring program and failure to implement an unsaturated zone monitoring program. EPA has issued a violation for failure to perform monthly monitoring of lysimeters for presence of liquids. The regional water quality control board has issued a number of violations for failing to monitor groundwater. The San Joaquin Air Quality Management District issued violations for failing to conduct required monthly monitoring.

b. Inadequate construction

The facility had one of the largest ever failures of a hazardous waste liner. A landslide occurred on one of the site’s slopes and tore out part of the liner system. This resulted in a displacement of over a million cubic yards of hazardous waste. Subsequent analysis suggests that the landslide resulting from design and construction issues.

c. Waste mismanagement

DTSC and EPA have issued numerous violations to Chemical Waste Management for failing to adequately treat waste prior to placement in the landfill, impermissibly land disposing prohibited waste, failing to maintain and operate facility to minimize releases, and improper disposal. For example, during a series of 2010 inspections, EPA investigators found that Chemical Waste Management improperly managed PCBs at the facility. Further analysis revealed spills next to the facility’s PCB Storage and Flushing Building. Samples taken by EPA and Chemical Waste Management in and around the building detected PCBs at elevated levels ranging from 2.1 parts per million (ppm) up to 440 ppm. These levels are above the regulatory limit of 1 ppm and, in soil, demonstrate that PCBs were improperly disposed of in violation of federal law.

C. DTSC Failed to Adequately Consider Chemical Waste Management's Compliance History Pursuant to CEQA:

The consideration of a facility proponents' environmental record is expressly mandated by the California Supreme Court in *Lauren Heights Improvement Ass'n v. Regents of the University of California*, 47 Cal.3d 376, 420. Because an EIR cannot be meaningfully considered in a vacuum devoid of reality, a project proponent's prior environmental record is properly a subject of close consideration in determining the sufficiency of the proponent's promises in an EIR.

Consideration must also be given to measures the proponent proposes to take in the future not just the measures it took or failed to take in the past. In balancing a proponent's prior shortcomings and its promises for future action, an environmental impact report should consider relevant factors including: the length, number, and severity of prior environmental errors and the harm caused; whether the errors were intentional, negligent, or unavoidable; whether the proponent's environmental record has improved or declined; whether he has attempted in good faith to correct prior problems; and whether the proposed activity will be regulated and monitored by a public entity.

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Based on the five-prong test set forth in *Lauren Heights*, Chemical Waste Management cannot be trusted to properly perform the activities, mitigation measures, closure and post closure monitoring proposed in the EIR and addendum.

D. DTSC Did Not Conduct a Comprehensive Compliance Review:

DTSC reports that TSCA/PCB records from before 1998 are not available. Since DTSC must review compliance history as part of its permit decision process and its CEQA review, the missing records are inexcusable. DTSC does not explain why these records are unavailable. However, DTSC must take considerable efforts to find and review these records. Until DTSC does an exhaustive and multi-agency search for these records, comprehensive review of the applicant's compliance history is not possible.

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E. Permit Approval Despite CWM's Extensive Track Record of Violations Would Be Dangerous and Ominous Policy Precedent for Other Polluters:

If DTSC approves a final permit despite CWM's extensive, chronic, repeat and serious violations, it will give the green light to other industries that they too can repeatedly violate their permit and still get new permits. This would be an unacceptable precedent and set terrible policy that would threaten the health and environment of all Californians, especially the low-income and people of color who disproportionately live near polluting industries including hazardous waste facilities.

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XV. Proposed Expansion Meets Other Criteria for Permit Denial:

A. Misrepresentation of Relevant Facts:

DTSC guidance outlines criteria the agency should use to determine whether to deny a permit. One criteria is "the permittee's misrepresentation of any relevant facts at any time."

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The permit expressly states that the failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit. Permit, citing 22 CCR § 66270.43; see also Health & Safety Code § 25186(d) (Grounds for denial include “[a]ny misrepresentation or omission of . . . information subsequently reported to the department.”). Chemical Waste Management’s recent citation for intentionally withholding information about 72 spills at the site over a four year period is grounds for a permit denial.

On February 7, 2010, the New York Times had a major story about the birth defect and hazardous waste issues in Kettleman City. The story included the following and referenced a claim made by Kit Cole, a Chemical Waste Management spokesperson:

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"Ms. Cole said that the Kettleman Hills facility was safe and that a vast majority of the waste handled was run-of-the-mill garbage from municipalities. Only 60 acres was devoted to the most dangerous material, she said, including hazardous chemicals and byproducts from manufacturing and agriculture, which are stabilized in cement blocks before they are buried." (emphasis added).

Greenaction promptly emailed the DTSC about this claim made by Chem Waste that they stabilized the hazardous waste in cement. We asked DTSC if the claim was accurate, as we knew it to be false. It unfortunately and unacceptably took DTSC two months to respond to our inquiry, but on April 6, 2010 we received a response from Nathan Schumacher, DTSC Public Participation Specialist. His response on behalf of DTSC confirmed that the statement attributed to Chem Waste in the New York Times was not true. He wrote the following:

“No, Waste Management does not encase all its waste in cement. However, to minimize mobility of the waste, Waste Management does stabilize or solidify some waste before burying it in the landfill. According to our data, the amount of hazardous waste stabilized or solidified was 7% of the total placed in the hazardous waste landfill.”

This email from DTSC is attached and incorporated into these comments as Exhibit F.

B. Permitted Activity Would Endanger Public Health and Cannot Be Adequately Regulated:

Another criteria for permit denial is “[a] determination that the permitted activity endangers human health or the environment and cannot be adequately regulated under a permit.” This evaluation includes not only the potential for releases of hazardous wastes at significant levels, but also other environmental impacts as well. The guidance document explains that significant impacts not directly associated with releases of wastes from a facility can be identified through the EIR process. According to DTSC, after all feasible mitigation measures have been imposed, the project will significantly increase ozone, coarse particulate matter (“PM10”) and fine particulate matter (“PM2.5”) emissions, result in a significant and unavoidable cancer risk at the KHF property boundary, significantly increase traffic impacts, and contribute to cumulatively considerable and significant greenhouse gas emissions.

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Massive diesel truck traffic would also have a severe impact. Kettleman City is heavily impacted by vehicular traffic because of its location at the intersection of two freeways, including Interstate 5, its

proximity to a large transfer station, and its location in one of the most contaminated air basins in the U.S. Asthma rates are extremely high. Yet, the facility proposes to add an additional 400 trucks per day. This increase in vehicular traffic will endanger human health and cannot be adequately regulated under a permit.

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XVI. Inadequate Mitigation Measures:

In an attempt to justify the improper and defective draft permit and attempt to pacify community concerns about massive diesel truck emissions, DTSC's proposed permit would phase in over a few years a requirement that diesel trucks going to and from the Chem Waste facility comply with cleaner vehicle standards. In the interim, hundreds of dirty and outdated diesel vehicles would go to and from the facility every day, exposing residents to dramatically increased diesel pollution. In fact, trucks older than 2010 would be allowed to continue going to the KHF facility until 2018, exposing residents to extensive toxic diesel emissions from tens of thousands of older dirtier trucks for at least four more years.

It is thus clear that the proposed requirements would be virtually meaningless in reducing pollution and in fact are being used to justify what certainly would be a massive increase in diesel truck traffic, diesel emissions and toxic emissions from the hazardous waste and PCB landfill.

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1. If DTSC approves the permits for expansion, the number of trucks carrying hazardous waste to the facility will increase from the current level of approximately one truck per day to approximately 400 per day. This is a shocking and unacceptable increase in truck traffic, diesel emissions and emissions from hazardous waste disposal due to the increase in emissions in an area that the state's CalEnviroScreen concluded is one of the most vulnerable and at-risk communities in the state.
2. A permit expansion that allows the massive increase in diesel pollution would in and of itself violate the state's public commitment to reduce pollution and not increase it in Kettleman City.
3. Even the EIR prepared by Kings County (an entity that is blatantly pro-Chem Waste and benefits financially from toxic dumping in Kettleman City) acknowledged that the proposed expansion would result in significant negative impacts that could not be mitigated including an increase in traffic.
4. Even newer diesel vehicles emit dangerous toxic and criteria pollutants.
5. Diesel trucks emit dangerous and unnecessary levels of pollution that can contribute to asthma, cancer, and other health problems, as well as to air pollution and climate change.
6. There is no basis to believe that Chemical Waste Management will comply with this requirement due to their many and chronic violations of many permit conditions that often continue for years at a time – and DTSC erred in assuming Chem Waste would comply with this or any other permit condition due the well-documented violation history at the facility.

7. There will be no meaningful enforcement by regulatory agencies or law enforcement of these requirements due to lack of capacity.
8. There will be no meaningful enforcement by regulatory agencies due to the well-documented failure of DTSC and other regulatory agencies to properly enforce permit conditions and the agency's failure to assess maximum or substantial fines against Chem Waste even for serious and chronic violations as evidenced by the minimal fines levied for failing to report 72 spills of hazardous waste (fines were approximately 25% of what could have been levied).
9. This increase in emissions of harmful pollutants and the traffic increase would negatively and disproportionately impacts the people of color and Spanish speaking residents of Kettleman City, in violation of state and federal civil rights laws.

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XVII. Independent Review of DTSC's Permitting Processes:

In the face of mounting criticism of DTSC's permit and regulatory actions, the Director of the Department of Toxic Substances Control, Debbie Raphael, released an open letter on February 15, 2013 announcing that the agency had "launched a comprehensive review of its permit process." The letter explains that "[d]uring the past two years, stakeholder feedback and our own internal observations have demonstrated that there is room for improvement in the process of permitting hazardous waste treatment, storage, and disposal facilities."

One of the stated reasons for the review was that "the department does not have clear guidelines for when to deny a permit." The purpose of the review was to provide recommendations for process improvements including standardized processes, clear decision-making criteria and corresponding performance standards. The recommendations and findings were due to be released by June 30, 2013.

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On October 8, 2013, the department formally released the report. The report notes many areas of deficiency including there being no clear and objective criteria for making denial/revocation decisions that are based on valid standards of performance and threats. The study recommends that DTSC develop policy to determine what factors to use to support a decision to continue with permitting versus those to use to support a denial or revocation action.

However, DTSC is proposing to move forward with a permit decision on the KHF expansion despite knowing that it does not have clear criteria in place to use and before having any opportunity to develop the criteria recommended in its own consultant's report. It is irresponsible for the agency to move forward with permitting such a controversial permit in such an overburdened community at the same time it has recognized the absence of clear criteria on when to deny the permit and is actively seeking ways to improve their permit process.

This permit decision will impact nearby residents for generations to come and needs to be done right. If DTSC approves the expansion permit without taking the time to implement recommended changes to the permit process, the agency will have acknowledged that the permit is the result of a flawed process, made without the benefit of any clear guidelines on when to deny a permit. Kettleman City

residents deserve a deliberate process with clear and objective criteria for permit approval or denial. Without such criteria, the process is subject to the whims of individual staff and political persuasion. Kettleman City residents should not suffer because of the incompetency of the agency.

We incorporate DTSC's permit review into our comments:

<http://dtsc.ca.gov/HazardousWaste/upload/DTSCPermitReviewProcessFinalReport.pdf>

XVIII. DTSC Erred in Failing to Prepare a Supplemental or Subsequent EIR:

Any time a discretionary approval is required by a responsible agency for a project for which an EIR has already been adopted, the agency must determine if a subsequent or supplemental EIR is required. The agency must prepare a subsequent or supplemental EIR if changes are required to make a previous EIR adequate.

A responsible agency must prepare a subsequent or supplemental EIR when (1) substantial changes are proposed in the project that will require major revisions of the EIR, (2) substantial changes occur in the circumstances under which the project is being undertaken that will require major revisions in the EIR, or (3) new information of substantial importance to the project that was not known and could not have been known at the time the EIR was certified as complete becomes available. Pub. Res Code § 21166; 14 CCR § 15162.

Addendums are only to be used when none of the conditions requiring a supplemental or subsequent EIR is present, but minor corrections or changes to the previous EIR are necessary. An addendum must document and support with substantial evidence the agency's determination that a subsequent or supplemental EIR is not required. 14 CCR § 15164(e).

DTSC did not prepare a subsequent or supplemental EIR for the proposed project. Rather, DTSC elected to prepare a 77-page Addendum that identified changes to the proposed project and listed recently approved projects in the area which may contribute to increased cumulative impacts.

The Addendum did not consider new impacts associated with project changes, multiple changed circumstances, and substantial new information not previously available. Nor did the Addendum support its finding that a supplemental or subsequent EIR was unnecessary with substantial evidence in the record.

DTSC erred in failing to prepare a subsequent or supplemental EIR because:

- (1) the applicant is proposing changes to the project that will lead to increased impacts;
- (2) circumstances under which the project will be undertaken have changed significantly; and
- (3) new information of substantial importance, which was not known at the time of EIR certification, has become available. See Pub. Res. Code § 21166; 14 CCR § 15162.

A. New Information Which Was Not Known and Could Not Have Been Known at the Time of EIR Certification Is Now Available.

CEQA requires a responsible agency to prepare a subsequent or supplemental EIR if “new information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.” Pub. Res. Code § 21166(c).

Since the time Kings County certified the EIR:

* USEPA has updated health protective air quality standards;

* The California Office of Environmental Health Hazard Assessment released a screening tool that identified Kettleman City as being in the top ten percent of California communities most disproportionately burdened by multiple sources of pollution;

Kings County did not have or consider this information when preparing its EIR for the project. This new information suggests that the project may have additional or more severe impacts than the County analyzed in the EIR. The new information triggers the need for a supplemental or subsequent EIR.

1. EPA’s Approval of a New Standard for Short-Term Nitrogen Dioxide Emissions Is Significant New Information:

New information has become available since Kings County certified the Supplemental EIR indicating that the project will likely have a significant and unavoidable impact on public health due to short-term exposure to nitrogen dioxide emissions. On February 9, 2010, after Kings County certified the Supplemental EIR for the project, EPA established a new primary National Ambient Air Quality Standard (NAAQS) for nitrogen dioxide (NO₂) based on a 1-hour averaging time (1-hour NO₂ NAAQS). The rule became effective April 12, 2010. 75 Fed. Reg. 6474 (Feb. 9, 2010). EPA lowered the primary NO₂ NAAQS in response to studies showing increases in respiratory symptoms and hospital visits related to short-term exposure to high levels of NO₂. *Id.* EPA found that the existing NAAQS did not sufficiently protect public health, especially in light of high incidences of near roadway exposure to NO₂. *Id.*

Exposure to nitrogen dioxide, a by-product of fossil fuel combustion, is associated with children’s hospital admissions, emergency department visits, and aggravation of asthma, including symptoms, medication use, and lung function. Persons with preexisting respiratory disease, children, and older adults may be more susceptible to the effects of NO₂ exposure. Individuals in sensitive groups may be affected by lower levels of NO₂ than the general population or experience a greater impact with the same level of exposure. In addition to intrinsically susceptible groups, people living and working near roadways may be at increased vulnerability due to higher exposures.

King County’s EIR relied upon EPA’s now-outdated 1-hour NO₂ NAAQS to determine the project’s air quality impacts on nearby residents. EPA’s finding that this standard was not sufficiently protective of public health and its adoption of a lower 1-hour NO₂ NAAQS is important new information that was not available at the time of EIR certification. DTSC must determine whether

NO₂ emissions associated with the project will have a significant impact on public health in light of EPA's approval of new 1-hour NO₂ NAAQS.

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2. Evidence Collected During EPA's Analysis of the Avenal Power Plant Is Significant New Information:

On May 5, 2011, EPA issued a Prevention of Significant Deterioration Permit for the Avenal Energy Project, a new 600 megawatt natural gas-fired power plant proposed in Avenal, just 12 miles from Kettleman City and KHF. Despite numerous attempts, the applicant for the Avenal Energy Project was unable to satisfy EPA that the power plant would not cause an exceedance of the new-health based 1-hour NO₂ NAAQS. Rather than delay the project any further, EPA made the unprecedented decision to grandfather the facility from the agency's new 1-hour NO₂ NAAQS. This decision is currently being challenged in the Ninth Circuit Court of Appeals. However, evidence EPA gathered for the Avenal Energy Project PSD permit is relevant to determine KHF's cumulative impact from short-term NO₂ emissions. This information was not available at the time of Kings County's EIR certification. Therefore, DTSC must now include and analyze this information as part of a supplemental or subsequent EIR.

Based on evidence in the Avenal Energy Project record, Kings County residents would be subject to NO₂ exposures near or over the NAAQS limit, even without the KHF expansion. In its analysis for Avenal Energy Project's Prevention of Significant Deterioration (PSD) permit, the EPA reported background NO₂ levels of 50 parts per billion (ppb) in Hanford and 61 ppb in Visalia, where the two closest monitoring stations are located. EPA concluded that operational emissions from the Avenal Power Project would add an additional 44 ppb to the maximum one-hour NO₂ impact. Avenal Energy Project, Supplemental Statement of Basis at 27. Therefore, without the KHF expansion, background NO₂ levels in the area after the power plant is constructed would be between 91 and 102 ppb, nearly exceeding or exceeding the 1-hour NO₂ NAAQS.

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Evidence from the Avenal Energy Project record also indicates that background NO₂ levels in Hanford and Visalia under-represent emissions in Kettleman City. EPA explains that "NO₂ concentrations on or near major roads are appreciably higher than those measured at monitors in the current network . . . and near-roadway concentrations have been measured to be approximately 30 to 100% higher than those measured away from major roads." Supplemental Statement of Basis at 19.

Kettleman City is directly adjacent to Interstate 5, one of the State's main commerce freeways, averaging 35,400 vehicles per day. Given EPA's own data, Kettleman City should have background levels of NO₂ of at least 65 ppb (30 percent greater than Hanford's 50 ppb background level) and could have background levels in Kettleman City as high as 130 ppb (100 percent greater than Visalia's 65 ppb). In Kettleman City, these background levels are exacerbated by the near roadway impacts from Interstate 5 and Highway 41, and impacts from the planned Avenal Energy Project. The expansion of KHF, with its addition of 400 trucks per day, will subject Kettleman City residents to unhealthy levels of NO₂.

Finally, the Avenal Energy Project record contained an analysis the local San Joaquin Valley Air Pollution Control District prepared for the Avenal Energy Project's compliance with the State's 1-hour

NO2 standard. The air district concluded that the project’s cumulative total impact for 1-hour NO2 (maximum facility impact and background) is 327.2 µg/m3 or 179 ppb. This emission level, while complying with California’s air quality standards, is well above the federal 1-hour NO2 NAAQS of 100 ppb. EPA Response Letter at 5, 14. The KHF expansion would increase emissions even more, subjecting Kettleman City residents to unsafe levels of NO2.

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This additional information triggers the need for DTSC to prepare a subsequent or supplemental EIR because it is new information, not available at the time of EIR certification, and indicates that the KHF expansion project would have more severe impacts than previously disclosed.

3. The CalEnviroScreen Identifies Significant New Information on the Vulnerability of Kettleman City Residents:

As discussed above, in April of 2013, the California Environmental Protection Agency, along with the Office of Environmental Health Hazard Assessment, released a science-based tool for evaluating multiple pollutants and stressors in communities for use by its boards, departments, and office. The tool shows which portions of the state have higher pollution burdens and vulnerabilities than other areas. The tool uses environmental, health, demographic and socioeconomic data to create a screening score for communities across the state. According to the Cal/EPA Secretary, an area with a high score would be expected to experience much higher impacts than areas with low scores. The Secretary also explained that “knowing which areas of the state have higher relative environmental burdens will not only help with efforts to increase compliance with environmental laws in disproportionately impacted areas, but also will provide Cal/EPA and its boards, departments, and office with additional insights on the potential implications of their activities and decisions.” California Communities Environmental Health Screening Tool, Version 1.1 September 2013 Update (hereafter “CalEnviroScreen v.1.1”) at ii.

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According to the CalEnviroScreen, the zip code containing Kettleman City is ranked in the top 10 percent of communities in California over-burdened by pollution from multiple sources and most vulnerable to its effects, taking into account their socioeconomic characteristics and underlying health status. CalEnviroScreen v.1.1 at 105.

Though DTSC references the CalEnviroScreen results in its Environmental Justice Review, the agency does not address, analyze, or include the new information in its CEQA analysis to determine what impact the KHF expansion will have on Kettleman City given the communities’ existing pollution burden and its extreme vulnerability to pollution. Though the CalEnviroScreen is not intended as a stand-alone substitute for the cumulative impact analysis required by CEQA, there is nothing that prevents DTSC, as a department of Cal/EPA, from considering information contained in the CalEnviroScreen about the community’s high vulnerability to pollution as part of its CEQA analysis.

B. Substantial Changes in the Circumstances Under Which the Project Is Undertaken Require Additional CEQA Analysis:

An agency making a discretionary decision on whether to carry out or approve a project must consider any substantial change in circumstances that occurs after preparation of the EIR if the changed

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circumstances could lead to new or more severe significant impacts. Pub. Res. Code § 21166; 14 CCR § 15162(a)(2).

1. The Recent Valley Fever Epidemic in Kings County Is a Changed Circumstance That May Lead to New or More Severe Impacts from the KHF Expansion:

Valley fever is caused by a soil fungus that is inhaled into the lungs. The fungus grows in the soil. The fungus can become airborne when the ground is broken and the dirt and dust spread into the air. Experts say people who work in dusty fields or construction sites are most at risk, as are certain ethnic groups and those with weak immune systems. Newcomers and visitors passing through the region may also be more susceptible.

The valley fever fungus grows particularly well in the alkali soils on the San Joaquin Valley's west side. The fever has hit Kings County particularly hard in recent years, with incidence dramatically increasing in 2010 and 2011, after EIR certification. Valley fever cases in Kings County rose sharply in 2010, and remain at record level highs. Most valley fever cases in Kings County occur in Kettleman City and Avenal. For example, although Kettleman City and Avenal represent only 12% of the County population, from 2007-2010 they accounted for 67% of the reported cases.

The SEIR, prepared prior to the recent sharp increase in valley fever, did not consider the project's construction related impacts on valley fever. Expansion related construction will disturb soils and increase airborne dust. Construction workers, nearby residents, and travelers stopping in the heavily used Kettleman City truck stop area are all at risk from any activity that increases dust and airborne soil spores. The recent spike in valley fever cases near KHF is a changed circumstance pursuant to Public Resource Code, Section 21166 that necessitates additional CEQA review.

2. CWM KHF Currently Receives Far Fewer than the 400 Trucks Estimated in the EIR:

DTSC bases its calculation of current project impacts on the faulty assumption that the facility accepts the maximum of 400 truckloads of waste per day (or 7,200 cubic yards per day). This assumption vastly overstates the amount of waste that is presently accepted by the facility. Currently, CWM's facility accepts no more than 10 trucks per week or just over one truck per day. Even at its peak, the facility accepted about 100 trucks of hazardous waste each day.

In considering project impacts, DTSC assumed that the facility would continue to accept 400 truckloads of waste per day after the expansion. By artificially and incorrectly assuming that the facility currently accepts the maximum peak amount of 400 truckloads per day and that it will continue to accept this amount of waste after expansion, the DTSC obscures and understates the effects of expansion on the facility's emissions profile by a factor of hundreds.

DTSC's method of assessment makes it appear as if the expansion will not result in any significant increase in emissions, which is not the case. Residents will be impacted by far more emissions than they currently experience. DTSC must revise its analysis of emissions in order to accurately reflect the current state of emissions at the facility, and to accurately reflect the significant environmental and public health effects of expanding the CWM facility. The drastic reduction in the number of truckloads of waste received at the facility is a changed circumstance that requires a substantial

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revision of the EIR to accurately reflect the environmental impacts of vastly increasing the number of trucks travelling to the facility.

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3. The Addition of Pollution from Related Projects Is a Changed Circumstance that May Lead to New or More Severe Cumulative Impacts than Previously Analyzed:

CEQA requires DTSC to discuss and reasonably analyze the project and related projects' cumulative effects on the environment. CEQA Guidelines § 15130(a). A cumulative impact "is a change in the environment that would result from the incremental impact of the project [under consideration] when added to other closely related past, present, and reasonably foreseeable probable future projects." *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 117, citing 14 CCR § 15355. "Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." CEQA Guidelines § 15355(b). A cumulative impact analysis must include (1) an identification or summary of related past, present, and probable future projects; (2) a summary of the related projects' expected environmental effects, and (3) a reasonable analysis of the related projects' cumulative impacts. CEQA Guidelines § 15130(b).

While DTSC listed some of the additional projects proposed or approved in the area, the agency did not adequately assess the cumulative impacts from these related projects. CEQA requires that DTSC consider the combined effect of related projects in the vicinity. CEQA Guidelines § 15355 (defining cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts,") (emphasis added); see also *Resources Agency*, 103 Cal.App.4th at 120 (to make a significance finding, the analysis must determine whether a proposed Project's incremental contribution is cumulatively considerable in light of the existing environment) (emphasis added).

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DTSC violated CEQA, therefore, when it merely listed and summarized related projects, rather than assessing their combined cumulative impacts with the KHF expansion project. Cumulative impacts may be significant whether or not each individual project has significant impacts.

i. FedEx Transfer Facility

DTSC acknowledges that the new FedEx transfer facility will increase the number of diesel trucks in the area. The facility will receive up to 212 trucks per day and up to 125 additional employee vehicle trips. DTSC argues that some of these trips would not be new truck trips because they were previously associated with another, much smaller, Kettleman City facility. However, DTSC does not disclose how many of the trucks will consist of new truck trips to Kettleman City. This information is critical to understand how the transfer facility will contribute to cumulative impacts from the KHF expansion.

DTSC concludes that the transfer facility "does not change the Final SEIR findings or conclusions" because the project does not increase the number of trucks travelling through Kettleman City. Instead, trucks will turn from SR-41 onto 25th Avenue to the facility which is 1.5 miles from the residential part of town. What DTSC does not mention is that the turnoff from SR-41 to 25th Avenue is right at the boundary of the residential area and that all the trucks traveling to the facility will pass within a couple hundred yards of the town's residents.

Studies conclude that traffic pollution causes asthma attacks in children, and may cause a wide range of other effects including: the onset of childhood asthma, impaired lung function, premature death and death from cardiovascular diseases, and cardiovascular morbidity. The area most affected, the studies concluded, was roughly 0.2 mile to 0.3 mile (300 to 500 meters) from a busy road. Therefore, transfer facility trucks travelling right past town will increase cumulative impacts to Kettleman City residents. DTSC's contentions to the contrary are not supported by evidence in the record.

DTSC also states that the transfer station will not increase air quality impacts from these diesel trucks because these trucks would travel past Kettleman City on the I-5 even without the project. However, as discussed above, the project now brings the diesel trucks within a few hundred yards from residents. DTSC has not considered this potential cumulative impact.

DTSC asserts that the air quality impacts from the facility were included as part of the Investigation of Birth Defects and Community Exposures in Kettleman City (December 2010). However, the transfer facility was not built, or even approved at that time. DTSC is simply incorrect in its assertions that the impacts from diesel emissions were previously analyzed. DTSC actually referred to a prior analysis of a smaller overnight facility. This analysis is simply not relevant to assess the impacts of the much larger FedEx transfer facility. DTSC must consider the cumulative air quality and safety impacts from the transfer facility because its truck traffic impacts will exacerbate air quality and traffic impacts from the KHF expansion.

Finally, DTSC argues that the (non-CEQA) traffic study for the transfer station included the KHF expansion in its cumulative impact analysis. This confirms rather than negates the need for DTSC to prepare and consider a similar analysis as part of its KHF expansion permit decision.

ii. Oil and Gas Projects

DTSC listed a number of oil and gas projects involving fracking near Kettleman City. However, DTSC's analysis consisted of listing the Division of Oil, Gas and Geothermal Resource's (DOGGR) findings as part of each Initial Study/Negative Declaration. DTSC did not consider the cumulative impacts of the fracking projects, much less the combined impact of all related projects with the KHF expansion as required by CEQA.

For example, DTSC reported that the Initial Study/Negative Declaration for the Jaguar wells found that construction would result in short term, less than significant air quality impacts. However, except for providing the example of particulate matter emissions, DTSC does not disclose what air quality impacts the project would have, and failed to assess the impacts in combination with the KHF expansion and other existing and proposed projects. Since "cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (14 CCR § 15355(b)), DTSC must do more than identify the projects' individual impacts. Rather, DTSC must assess project impacts in combination with other related sources.

Since the oil and gas projects would likely contribute to air quality, greenhouse gases, water quality and supply, hazardous materials, and biological resources impacts, DTSC must consider their combined impact with the KHF expansion project and other related projects.

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DTSC acknowledges that if a well is determined to be economically viable, it will be completed as a producing well. However, DTSC failed to consider cumulative impacts associated with producing wells, but instead assumes that every single well would prove to be unproductive and capped. CEQA requires that a cumulative impact analysis include impacts from probable future projects. 14 CCR § 15065(a)(3). DTSC should look at well-established data on the percentage of exploration wells that are typically completed as producing wells to determine their likely cumulative impact. DTSC cannot rely on its belief that DOGGR may evaluate individual production wells in the future to avoid analyzing impacts. DTSC has an independent obligation to consider cumulative impacts from probable future projects such as production wells before approving the KHF expansion permit.

DTSC fails to consider cumulative impacts associated with nine oil and gas wells owned by Innex California Inc. DTSC does not consider the cumulative impact from these wells because DOGGR did not require environmental review for the wells for various reasons. However, the previous lack of environmental review does not insulate DTSC from its independent duty to assess the cumulative impact of the KHF expansion with these related projects.

DTSC also fails to consider the Zodiac Energy LLC Processing Facility in determining whether the KHF expansion has cumulatively significant impacts in combination with related projects. DTSC did not consider the Zodiac Processing facility a related project because the applicant requested that the processing of its application be put on hold. However, the applicant has not withdrawn its application. The County has already initiated the CEQA process through an Initial Study/Mitigated Negative Declaration which found areas of potentially significant impacts. Once the environmental review process for a project is underway, an agency should consider it as a probable future project for purposes of a cumulative impact analysis under CEQA. *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61.

DTSC must provide a summary of expected cumulative environmental effects and a reasonable analysis of the cumulative impacts of the relevant projects. 14 CCR § 15130(b)(4)-(5). This discussion must be more than simply describing related projects and coming to a conclusion “devoid of any reasoned analysis.” *Whitman v. Board of Supervisors* (1979) 88 Cal.App.3d 397, 411. For fracking oil and gas wells, DTSC should specifically consider potentially cumulative air quality impacts, water quality and supply, hazardous materials, greenhouse gas emissions, and habitat loss along with impacts from the KHF expansion and other related projects.

C. DTSC Proposes to Approve Changes to Project Which Would Increase the Project’s Impacts.

The applicant is proposing a phased build-out of the B-18 landfill to provide for earlier use of a portion of the B-18 Landfill expansion while construction of the remaining portion of the liner system and landfill is completed. The phased approach will create impacts not previously analyzed as part of the EIR.

The phased approach will allow the applicant to submit a certification report for a 3.5 acre area. Once DTSC and other agencies approve this small area, the applicant will begin placement of waste at the B-18 landfill. Pursuant to this new design, construction-related impacts and operation-related impacts

will overlap to a greater degree than analyzed in the EIR. Diesel emissions from construction equipment and diesel emissions from trucks disposing of hazardous waste at the site will cumulatively impact air quality and the health of nearby residents. These increased diesel emissions will have a greater impact on the environmental and nearby residents than previously analyzed in the EIR.

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By phasing the placement of the liner, CWM places the liner integrity at risk. This phased liner construction will lead to additional seams or other places of weakness. An examination of the best available landfill liners concluded that brand-new state of the art liners can be expected to leak at the rate of about 20 gallons per acre per day even if installed with optimal quality-control procedures. This rate of leakage is caused by pinholes during manufacture and holes created when seams are welded together during landfill construction. The more seams in a liner, the greater chance for liner seepage or failure. DTSC did not consider this potential impact in the addendum.

D. DTSC’S CEQA Findings Are Clearly Erroneous:

As described in the CEQA Guidelines, “[a] Responsible Agency complies with CEQA by considering the EIR ... prepared by the Lead Agency and by reaching its own conclusions on whether and how to approve the project involved.” Pursuant to CEQA Guidelines section 15096(h), a Responsible Agency “shall make the findings required by Section 15091 for each significant effect of the project and shall make the findings in Section 15093 [Statement of Overriding Considerations] if necessary.” If the responsible agency believes that the final EIR is not adequate for use by the responsible agency, it may prepare a subsequent EIR under Section 15162. *Id.*

Here, DTSC decided not to prepare a Supplemental EIR, relied on the inadequate analysis and racially discriminatory process in the County’s EIR, and issued independent findings that are clearly erroneous and not supported by the record.

1. DTSC’s Findings Are Based on an Improper Baseline:

The project baseline should normally be the existing physical condition in the affected area. CEQA Guidelines §§ 15125(a), 15126.2. Establishing a baseline at the beginning of the CEQA process is a fundamental requirement so that an agency may evaluate changes in context and analyze impacts. *Richmond, supra*, 184 Cal.App.4th at 89. The EIR baseline should, therefore, reflect the current level of operations at the existing B-18 landfill. Today, this baseline would be a facility receiving about one truckload a day of hazardous waste.

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DTSC does not analyze impacts using existing conditions as its baseline. Instead it relies on the clearly erroneous baseline set by the County in its EIR. The County’s baseline was inadequate even for its own analysis because it did not reflect normal operating conditions at the B-18 landfill when the CEQA analysis first commenced. The County set its baseline at peak level of operations. This peak level was generated using data from only 16 days over a five-year period (2001-2005) when the facility received over 380 loads. Using this arbitrary methodology, the County set its baseline at 400 daily truckloads of hazardous waste.

Even when the CEQA Analysis commenced in 2005, the existing B-18 landfill received approximately 180 daily truckloads. See EPA draft Environmental Justice Review (“Each business day,

approximately 250 trucks containing waste travel to KHF from various directions. Of the 250 trucks, approximately 180 trucks contain hazardous waste.”). Even at its peak, the facility accepted 575,000 tons of hazardous waste annually, which averages out to just 100 trucks each day.

By establishing a baseline based on historic “peak” daily conditions rather than actual conditions at the time CEQA review commenced, the County’s EIR failed to disclose and analyze the project’s true impacts on noise, air quality, global climate change, traffic, and public health. Based on the faulty baseline, the County’s EIR erroneously concludes that “the proposed project would not result in an increase in the existing number of daily truck round trips to and from KHF.” Assuming there is no increase in daily truck-trips, the County then concluded that the proposed project would not result in additional truck-related noise impacts; increases in existing traffic; or net increases in global GHG emissions. Using the same rationale, the County’s EIR states that “emissions from the proposed Project operations would represent a continuation of the emissions from the existing disposal of hazardous waste and designated waste at KHF.”

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In reality, the expansion will add at least 220 truck-trips per day over conditions when the CEQA review first commenced and 399 trucks over current conditions at the facility.

By relying on an artificially elevated baseline, DTSC avoids disclosing and mitigating the potential impacts from virtually all truck traffic and hazardous waste shipments to KHF. DTSC erred in failing to assess project impacts based on current existing conditions to accurately determine the project’s effects on health and the environment.

2. DTSC’s Statement of Overriding Considerations Is Clearly Erroneous and Cannot Support Project Approval:

When an agency approves a project with significant environmental effects that will not be avoided or substantially lessened, it must adopt a statement that, because of the project’s overriding benefits, it is approving the project despite its environmental harm. 14 CCR § 15043. The agency must set forth the reasons for its action based on the final EIR or other information in the record. Pub. Res. Code § 21081(b); 14 CCR § 15093(a). The statement of overriding consideration must be supported by substantial evidence in the record of the agency’s proceedings. 14 CCR § 15093(b); see also *Sierra Club v. Contra Costa County* (1992) 10 Cal. App.4th 1212, 1223 (statement of overriding considerations should be treated like findings and therefore must be supported by substantial evidence.). A statement is legally inadequate if it does not accurately reflect the significant impacts disclosed by the EIR and mischaracterizes the relative benefits of the project. See *Woodward Park Homeowners Ass’n v. City of Fresno* (2007) 150 Cal. App. 4th 683, 717.

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DTSC found that specific economic, legal, social, technological and other anticipated benefits of the Project outweigh the significant and unavoidable impacts to justify project approval. DTSC specifically relies upon six benefits to make this finding. Most of the stated benefits concern the need for added hazardous waste disposal capacity within the state. However, nowhere in the permitting process has DTSC provided a useful review or consideration of the needed state capacity for hazardous waste disposal in California. State law required DTSC to provide this analysis in a statewide hazardous waste management plan beginning in 1991 and updated every three years. See Health &

Safety Code § 25135.9. However, DTSC has never prepared the requisite analysis. Without this analysis, DTSC has no way of knowing whether the state needs additional hazardous waste disposal capacity and no way to support its finding of an overriding project benefit.

DTSC cites an increase in hazardous waste generation in California from 1997 through 2002 as the only evidence supporting its statement of overriding considerations. However, 10 year old data about increased hazardous waste generation is not evidence supporting DTSC argument that the state needs additional capacity today. DTSC does not disclose or analyze how much waste is currently generated and how much capacity remains at existing hazardous waste facilities in California. Without providing any information on the state's supply and demand for hazardous waste disposal options, DTSC has no evidence demonstrating that the project will achieve any of the stated benefits.

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In fact, if DTSC meets its goals of reducing hazardous waste to less than 500,000 tons per year, the state may not need the additional 5 to 19 million cubic yards of capacity at Kettleman Hills. The expansion of landfill capacity will reduce the costs of disposal and actually act as a disincentive to reaching the state's 50% hazardous waste reduction goal. Rather than benefiting the state, the expansion will undermine statewide hazardous waste goals.

DTSC also explains that one of the project benefits is to receive hazardous waste generated by U.S. businesses with facilities in Mexico. However, DTSC also acknowledges that the facility only receives the equivalent of half a truckload of waste per year from Mexico. Existing facilities have sufficient capacity for this very small amount of waste. DTSC does not provide any evidence that demonstrates that the KHF expansion is needed to provide capacity for waste from Mexico.

Because DTSC has no support for its findings of overriding considerations, and is unable to demonstrate that the facility provides any benefit, DTSC should not approve the expansion permit.

3. DTSC Fails to Analyze Impacts From the Whole of the Project:

CEQA requires agencies to examine "the whole of an action, which has the potential for resulting in either a direct physical change to the environment, or a reasonably foreseeable indirect physical change in the environment." 14 CCR § 15378.

Chemical Waste Management is proposing to add capacity at its Kettleman Hills Facility by expanding the existing landfill (B-18) by 4.9 million cubic yards of landfill space and by adding a new landfill (B-20) with 14.2 million cubic yards of landfill space. DTSC's CEQA analysis considered only the first phase of the project, the expansion of the B-18 landfill. DTSC did not consider impacts from the new landfill. CEQA requires agencies to examine the "whole of an action" that can result in a direct or reasonably foreseeable indirect change in the environment. 14 CCR § 15378(a). Where a phased project is to be undertaken and where the total undertaking compromises a project with significant environmental effect, agencies must prepare a single analysis for the ultimate project. *Id.*

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Though DTSC relies primarily on Kings County's SEIR for its analysis, once DTSC prepared an addendum, CEQA required the agency to look at the whole project rather than simply its first phase. This is especially the case here, where the agency considered whether newly approved or proposed

related projects would have a cumulative impact when combined with the KHF expansion project. By excluding the B-20 landfill from this determination, DTSC's analysis is incomplete.

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4. DTSC Defers Analysis in the Guise of Mitigation:

The fact that DTSC is requiring a new monitoring station to collect data on air pollution travelling toward Kettleman City indicates that the existing monitors are currently insufficient to determine the air pollution risks in the community. The information that will be collected by the monitor should be reviewed and considered prior to issuing the permit, not as a mitigation measure.

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In fact, CEQA prohibits deferring analysis under the guise of mitigation.

5. Health Risk Assessment:

The permit states "[t]o ensure that air emissions do not result in unacceptable risks to human health, the Permittee shall prepare a Health Risk Assessment (HRA) in accordance with the DTSC-approved ambient air monitoring program work plan."

The health risk assessment should not be a condition of the permit; rather DTSC must prepare and consider the health risk assessment prior to issuing the permit. The HRA needs to be completed prior to issuance of permit, not as mitigation.

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XIX. Defective Public Notice and Invalid Public Comment Period - DTSC Failed and Refused to Provide the Legally Required Notice to Greenaction, Kettleman City residents and Your Mandatory Notice List for the Chemical Waste Management Kettleman Hills Facility:

DTSC is required to provide the public a meaningful opportunity to participate in this permit decision. DTSC claims that their extensions of the "public comment period" provided ample opportunity for people to comment.

Unfortunately, either through negligence, incompetence or intention to exclude meaningful participation, DTSC has committed serious violations of their public participation mandate, failed to provide the legal official notice to the public as required, and created a confusing public comment period that impeded and made difficult the public's right to participate in the process.

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A. DTSC'S Initial Notice Defect:

DTSC publicly announced their draft permit decision on the proposed landfill expansion on July 2, 2013, yet Greenaction was not provided a copy of the public notice in a timely fashion despite the fact that we are on the DTSC's mandatory contact list.

On July 26, 2013, Greenaction's Executive Director emailed DTSC to inform them we never received notice, a violation of DTSC's public notification requirements. A copy of this email is attached as Exhibit G.

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DTSC's problems and violations of their public notice requirement subsequently increased and continued, rendering the public comment period and public hearing invalid.

B. DTSC Failed to Notify Residents & Contact List Where to Submit Written Comments:

DTSC issued a "Community Notice" dated July 2013 and another one dated August 7, 2013. Neither of these notices provided to the public and DTSC's mandatory contact list informed the reader of where to submit written comments, an enormous defect in the notice. Copies of these notices are incorporated into our comments and attached as Exhibits H and I.

A proper and legal notice should inform the public of the mailing and email address where comments should be sent, but the DTSC notice failed to give any information whatsoever about where to submit written comments. As a result of this fatal defect in the notice, the public comment period and public hearing were not properly noticed and thus are invalid.

In addition, the information subsequently sent to your entire mailing list on how to submit written comments does not correct the defect in the "Community Notices" which failed to contain the required information about submitting written comments. Your failure to provide that information when the public comment period supposedly started on July 2, 2013 resulted in recipients losing one month of time in which to prepare written comments on this complicated, technical and multi-faceted permit issue.

C. DTSC Failed to Provide Official Legal Notice to Residents, Greenaction and Mandatory Contact List:

DTSC admitted it failed to send the official legal notice to Kettleman City residents, Greenaction and others on its mandatory public notification list.

We were further concerned to learn that the "Community Notices" were not the official legal notice that everyone on the mandatory contact list including residents should have received on July 2, 2013 when DTSC issued the draft permit decision. We learned this from a September 6, 2013 email from Patrice Bowen of DTSC, attached and incorporated into these comments as Exhibit J.

Ms. Bowen and DTSC defend the fact that the document entitled "Community Notice" we and others were sent lacked information on how to submit written comments by arguing that the official "legal notice" contained that information.

As a result, it is now clear, and confirmed, that the "Community Notice" DTSC sent to residents and everyone else on your mandatory contact list for official notices was not the official legal notice.

I have attended virtually every public hearing, meeting and workshop the state has had in the last 25 years regarding the Kettleman City hazardous waste facility, and the DTSC always told people that they would be put on the mandatory notification list for official notices if they signed up. I have been on the state's mandatory contact list for the Chemical Waste Management facility longer than almost everyone, yet did not receive the original DTSC notice and was not sent the official legal notice in a timely fashion.

As a result, DTSC is now breaking its promise, and legal responsibility, to provide the legal and timely notice of opportunities for public comment to those on its mandatory contact list, including the residents of Kettleman City.

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In addition, the failure to provide the legal notice to all those you were required to send it to renders the “public hearing” held on September 18, 2013 invalid.

The failure to provide full, legal and timely notice to all that are entitled to it renders your entire comment period invalid, has had a discriminatory and disproportionate impact on people of color and Spanish-speakers, and constitutes a violation of state and federal civil rights laws.

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The fact that Greenaction was subsequently provided the official notice does not remedy the original failure to provide the actual legal notice to us and others.

D. DTSC Initially Refused to Accept Residents’ Written Comments at DTSC Office in Clovis:

When Maricela Mares Alatorre, a Kettleman City resident and member of El Pueblo and Greenaction, contacted DTSC in Clovis to arrange to deliver written comments from dozens of residents, she was told that would not qualify as submitting comments in the proper way. It was only after extensive effort that DTSC affirmed comments could be hand delivered to the Clovis office of DTSC. Residents should not have had to be so persistent in order to participate in what is supposed to be a public permit process.

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XX. July 31, 2013 DTSC “Open House” Was Improperly Noticed, and was Biased in Favor of Chem Waste Due to Inaccurate and Misleading “Information” and Problematic Meeting Format:

A. Defective Notice for Open House:

As DTSC has now acknowledged, the agency failed to provide the legally required notice of the initial public comment period including the “open house” to all members of the public that they were required to provide notice to.

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B. Meeting Format:

The format of the meeting was designed and/or had the effect of preventing attendees from hearing all the discussions, questions and answers regarding permit-related issues. This was not conducive to learning the issues or having a transparent process.

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C. Misleading and Omitted “Information:”

The DTSC “Open House” was promoted by DTSC/Cal EPA as an opportunity for the public to learn more about the proposed approval of Chemical Waste Management’s application for a major expansion of their hazardous waste landfill. Instead, members of the public attending the open house were given biased, one-sided, incomplete and misleading “information” by DTSC and several other agencies.

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Despite the fact that the DTSC and other agencies present at the “open house” have taken repeated enforcement action against Chemical Waste Management, members of the public entering the meeting were surprised and outraged that there was not one mention, not one word, fact sheet, display or

document provided by any agency at the meeting informing the public about the numerous and chronic permit violations committed by the company.

Particularly disturbing and problematic was the DTSC's display board entitled "Enforcement" had no mention at all of even one violation.

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The DTSC's failure to provide any information about violations on fact sheets or display boards is especially problematic as DTSC is well aware that the chronic violations committed by Chemical Waste Management are a major permit issue.

It was only after members of the public, including residents who are members of El Pueblo/People for Clean Air and Water of Kettleman City and Greenaction, objected to this blatantly biased omission by the DTSC and other agencies, that a DTSC staff member pulled some information about violations out of a file folder. There were no copies in Spanish, and there no copies even in English to provide to the attendees.

DTSC's failure to provide information on Chem Waste's troubled violation history demonstrates bias and the tainting of the permit process.

XXI. Four Overlapping Public Comment Periods Undermine Public's Ability to Fully Comment and Participate in the DTSC Permit Process:

Three state-related agencies (DTSC, the Regional Water Quality Control Board and the San Joaquin Valley Air Pollution Control District) are having overlapping comment periods on the proposed hazardous waste landfill expansion.

These overlapping comment periods made it literally impossible for residents and advocates, including Greenaction, to participate meaningfully and comprehensively in all three as is their right. Greenaction and others had to choose which draft permit approvals we would focus on the most, resulting in less time and effort being allocated to all three comment periods for very important agency permit decisions.

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Each of the agency permit processes involve distinct laws, complex regulations and large technical documents, and to meaningfully participate in the process it takes time to read, research, evaluate and comment on these documents and the proposed permit actions.

As a result, the overlapping comment periods directly benefitted Chemical Waste Management at the expense of the affected community and their advocates who were unable to fully focus on any of the three draft approvals.

Also, the defects in many of the notices, the constantly changing public comment periods and the rescheduling and canceling of hearings by the agencies has resulted in widespread confusion among residents about what the agencies' public processes are and how they can participate.

In addition, another state agency, the California Energy Commission (CEC), held a public comment period and workshops on the proposed Hydrogen Energy California coal gasification and fertilizer plant at the very same time as the permit processes and so-called public hearing held by DTSC on the

toxic waste landfill issue in Kettleman City. The HECA project would cause significant pollution nearby in Kern County and increase pollution in the over-polluted San Joaquin Valley, thus requiring Greenaction and others to spend significant amounts of time reviewing and drafting comments on the HECA and CEC documents – and thus detracting from time we could spend on the Chem Waste/DTSC permit process.

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Greenaction, residents and allies made our concerns about overlapping comment periods clear to state agencies and officials, but they continued with the overlapping periods and with the DTSC hearing taking place the same night as an important CEC workshop on HECA.

XXII. Conclusion:

As a state agency mandated to protect public health and the environment, ensure compliance with the law including permits, provide meaningful opportunities for public involvement, and required to comply with and uphold civil rights laws and environmental justice policies and mandates, DTSC's draft permit is defective and DTSC must rely on the extensive facts and deny new permits to Chemical Waste Management.

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For environmental justice,



Bradley Angel
Executive Director
Greenaction for Health and Environmental Justice

CWM Kettleman Hills Facility RCRA/TSCA Inspections 1983 - Present

RCRA CEI Inspections:

- April 13-14, 1983 (EPA) inspection: Violation identified (in 1985 CAFO)
- March 21 - April 18, 1984 (EPA) inspection: Violation identified (in 1985 CAFO)
- May 23 - 24, 1984 (EPA) inspection: Violation identified (in 1985 CAFO)
- March 19, 1988 (State): Violation identified (Return to Compliance (RTC) on 5/19/89)
- August 24, 1988 (State): Violation identified (RTC on 10/12/88)
- February 8, 1989 (EPA): Violation identified (RTC on 4/24/89)
- April 24, 1989 (State): Violation identified (RTC on 1/2/90)
- November 19, 1989 (State): No violations found
- November 19, 1990 (State): Violation identified (RTC on 3/12/91)
- May 13, 1991 (State): Violation identified (RTC on 5/12/92)
- November 26, 1991 (EPA Contractor): Violation identified (RTC on 5/12/92)
- May 12, 1992 (State): 2 violations found (RTC on 6/25/92)
- May 14, 1992 (EPA): No violations found
- September 18, 1992 (State follow-up): Violation identified (RTC on 8/8/93)
- November 3, 1992 (State): Violation identified (RTC on 1/21/93)
- April 23, 1993 (EPA Contractor): Violation identified (RTC on 12/14/93)
- November 1, 1993 (State): No violations found
- April 5, 1994 (EPA Contractor): Violation identified (RTC on 10/5/94)
- November 7, 1994 (State): No violations found
- May 3, 1995 (EPA): Violations identified (RTC on 10/13/95)
- November 7, 1995 (State): Violations identified (RTC on 11/17/95)
- November 19, 1996 (State): No violations found
- February 12, 1997 (EPA): No violations found
- March 31, 1997 (State): No violations found
- April 1, 1997 (State): No violations found
- May 12, 1997 (State): No violations found
- June 23, 1997 (State): No violations found
- October 22, 1997 (State): No violations found
- November 19, 1997 (State): No violations found
- December 3, 1997 (State): No violations found
- February 23, 1998 (State): No violations found
- May 12, 1998 (State): No violations found
- June 18, 1998 (State): No violations found
- July 21, 1998 (State): No violations found
- August 27, 1998 (State): No violations found
- October 6, 1998 (State): Violation identified (RTC on 10/9/98)
- November 24, 1998 (State): No violations found
- December 30, 1998 (State): No violations found
- February 2, 1999 (State): No violations found
- March 10, 1999 (State follow-up): No violations found
- April 30, 1999 (State follow-up): No violations found
- May 21, 1999 (State follow-up): No violations found
- June 16, 1999 (State): No violations found
- September 8, 1999 (EPA): No violations found
- September 28, 1999 (State follow-up): No violations found

- October 30, 2000 (State): 1 minor violation found (RTC on 11/3/00)
- September 17, 2001 (State): No violations found
- September 16, 2002 (State): No violations found
- January 21, 2004 (CUP A): No violations found
- March 15, 2004 (State): No violations found
- October 15, 2004 (EPA) (Subtitle D only): No violations found
- November 9, 2004 (State): No violations found
- March 23, 2005 (CUPA): No violations found
- January 11, 2006 (State): No violations found
- November 6, 2006 (State): No violations found
- November 15, 2007 (State): No violations found
- October 2, 2008 (CUP A): No violations found
- October 29, 2008 (State): No violations found
- September 15, 2009 (State): No violations found
- February 8-12, 2010 (EPA): Violations identified
- February 8-12, 2010 (State): Violations identified
- April 9, 2012 (State): Violations identified
- June 12, 2012 (State): No violations found

Nonfinancial Record Review Evaluations:

- January 26, 1987 (EPA): Violation identified (RTC on 8/24/88)

Financial Record Review Evaluations:

- August 2, 1988 (State): No violations found
- April 27, 1989 (State): Violation identified (RTC on 7/27/89)
- November 17, 1989 (State): No violations found
- April 6, 2000 (EPA): No violations found
- November 19, 1990 (State): No violations found
- May 7, 1992 (State): No violations found
- November 12, 1992 (State): No violations found
- October 18, 1996 (EPA): No violations found
- October 3, 1997 (EPA): No violations found
- November 18, 1999 (State): Violation identified (RTC on 3/21/00)
- April 6, 2000 (EPA): No violations found
- September 30, 2004 (State): No violations found
- September 22, 2006 (EPA contractor): No violations found
- March 1, 2007 (State): No violations found
- March 13, 2009 (State): No violations found
- October 6, 2009 (State): No violations found

Operation & Maintenance Inspections:

- February 20, 1989 (EPA): Violation identified (RTC on 4/24/89)
- July 30, 1991 (EPA): Violation identified (RTC on 12/20/91)
- August 15, 1992 (State): No violations found
- March 27, 1993 (State): No violations found
- May 15, 1995 (State): No violations found
- April 15, 1996 (State): Violation identified (RTC on 7/19/96)
- April 13, 1998 (State): No violations found

- May 2, 2001 (State): No violations found
- February 26, 2002 (State): No violations found
- June 15, 2004 (State): No violations found

Groundwater Monitoring Evaluations:

- September 30, 1987 (State): No violations found
- June 10, 2003 (State): Violation identified (RTC on 6/20/03)

TSCA - PCB Inspections (EPA inspections)

- Pre-1998 - Records not available
- October 14, 1998 - No violations documented (no PCB samples were collected)
- October 25, 2001 - No violations documented (no PCB samples were collected)
- April 14, 2004 - No violations documented (no PCB samples were collected)
- February 8-12, 2010 - Violations found (PCB samples were collected)
- June 2, 2010 - Violations found (PCB samples were collected)

CWM Kettleman Hills Facility RCRA/TSCA Enforcement Actions

RCRA Enforcement Actions

- EPA CAFO filed August 23, 2011 (\$400,000 penalty)
 - o Failure to make hazardous waste determinations for land disposal
 - o Impermissible land disposal of prohibited waste
 - o Failure to comply with hazardous waste permit
 - o Failure to close containers of hazardous waste
 - o Failure to maintain and operate facility to minimize releases

- DTSC Enforcement Order filed May 20, 2011
 - o Failure to notify State within 24 hours of the discovery of a release of a hazardous waste or hazardous constituent (PCB - soil near Flushing/Storage Unit)
 - o Failure to notify State in writing summarizing the findings within 10 days of discovery of a release of a hazardous waste or hazardous constituent (PCB - soil near Flushing/Storage Unit)
 - o Failure to notify State within 24 hours of the discovery of a release of a hazardous waste or hazardous constituent (PCB - sandblast grit on floor of Flushing/Storage Unit)
 - o Failure to notify State in writing summarizing the findings within 10 days of discovery of a release of a hazardous waste or hazardous constituent (PCB - sandblast grit on floor of Flushing/Storage Unit)
 - o Failure to notify State within 24 hours of the discovery of a release of a hazardous waste or hazardous constituent (PCB - ramp to Drum Storage Unit)
 - o Failure to notify State in writing summarizing the findings within 10 days of discovery of a release of a hazardous waste or hazardous constituent (PCB - ramp to Drum Storage Unit)
 - o Failure to notify State within 24 hours of the discovery of a release of a hazardous waste or hazardous constituent (PCB - spill on soil)
 - o Failure to notify State in writing summarizing the findings within 10 days of discovery of a release of a hazardous waste or hazardous constituent (PCB - spill on soil)

- DTSC Enforcement Order dated January 2, 2001 (\$0 penalty; \$5,000 admin. costs)
 - o Facility lowered closure financial assurance without approval from the State

- DTSC Enforcement Order dated January 21, 1993 (\$1,100 penalty)
 - o One 55-gallon container of hazardous waste and two bags of PCB wastes were not labeled
 - o Two containers of incompatible hazardous waste were stored next to each other

- DTSC Consent Agreement and Order dated November 10, 1989 (\$82,500 civil penalty; \$35,000 admin costs). Compliance schedule tasks:
 - o leave proper spacing between warning signs
 - o Notify DTSC of fires or explosions involving HW
 - o Ensure that all mandatory/supplemental analyses of waste loads are performed as required
 - o Ensure that all mandatory analyses of waste loads are performed or note on the fingerprint form why analyses are not needed
 - o Ensure that work orders are available upon request
 - o Purchase and install new eye wash units
 - o Make notation on manifest when bulk waste load with 10% or greater weight discrepancy is received
 - o Ensure that all containers in the drum storage area are identified
 - o Implement procedures to ensure proper inspection and maintenance of the closure cap and cover system at landfill B-14.

- o Determine and implement procedures to control wind dispersal of particulate matter at landfill B-19
- o Maintain sufficient daily cover on landfill B-19
- EPA Administrative Order on Consent dated September 18, 1988 (RCRA section 3013; no penalty)
 - o Addressed slope failure in Phase 1A of landfill B-19. Required:
 - Leachate and groundwater monitoring systems
 - Quarterly reports
 - Installation of temporary geosynthetic liner system in the wedge between the filled areas of landfill B-19, phase 1A and 1B
 - Implementation of construction quality assurance procedures and methods during construction of liners in wedge unit
 - Submittal of wedge material transfer plan
 - Transfer HW temporarily stored in the wedge unit to Phase II or III areas
 - Submit landfill B-19, Phase 1 A investigation plan
 - Submittal of B-19, phase 1A repair plan (after removal of waste)
- EPA/JTSC CAFO dated November 7, 1985 (\$2,103,000 to EPA for RCRA & TSCA violations; \$1,100,000 to State) (See TSCA entry below for TSCA violations)
 - o Failure to implement a groundwater monitoring program
 - o Failure to implement an unsaturated zone monitoring program
 - o Closure plan did not include description of how and when facility would be partially closed
 - o Closure of units without addressing units in the closure plan and without demonstrating how the closure of the units met closure performance standard conditions
 - o Substantial Modifications of the facility in violation of the permit
 - o Failure to develop and follow a written WAP
 - o Failure to collect representative samples of bulk liquid loads
 - o Failure to follow the WAP (samples collected by the truck drivers, not facility personnel)
 - o Mandatory analyses were not routinely conducted
 - o Failure to follow pre-acceptance procedures and initial detailed chemical and physical analysis
 - o Failure to minimize the possibility of unauthorized entry (2 gates were not secured and appropriate warning signs were not posted)
 - o Inspection schedule failed to include seven units
 - o Inspection records failed to include records of repairs or other remedial actions
 - o Weekly inspection records were missing
 - o Inspection records did not include inspections of run-on and run-off controls for the landfills and land treatment
 - o Inspection records did not include measures for controlling wind dispersion of hazardous waste from the landfills
 - o Inspection records did not include inspection of the perimeter fence
 - o Inspection records did not include daily inspections of freeboard level and the surface impoundments
 - o Operating record did not indicate method and date of treatment, storage and/or disposal
 - o Failure to maintain records of internal waste transfers
 - o Failure to keep records of the amount, type, date, and disposal location of hazardous wastes generated at the truck wash station
 - o Failure to maintain sufficient freeboard at the surface impoundments
 - o Failure to have protective cover on surface impoundment earthen dikes
 - o Potentially incompatible wastes were placed in surface impoundments without developing waste analyses, trial treatment tests or treatment and compatibility results
 - o Potentially incompatible wastes were placed in surface impoundments without documenting

- how the facility complied with 265. 17(b) and Item 7(b) Part III of the permit
- o Failure to maintain maps for landfills B-10 and B-11 and contents and locations of hazardous waste within each cell for landfills B-6, B-9, B-10, B-11 and B-13 in the operating record
 - o Failure to demonstrate that bulk liquid wastes were treated or stabilized prior to disposal so that free liquids were no longer present
 - o Failure to demonstrate that reactive bulk liquid wastes were treated, rendered or mixed before or immediately after disposal to make them non-reactive
 - o Placement of containerized liquid waste in landfills for 58 days
 - o Hazardous waste not amenable to biological degradation or chemical reactions in the soil were applied to land treatment units; failure to conduct studies to characterize the waste to determine suitability for land treatment
 - o Application of hazardous waste to land treatment units without determining constituent concentrations
 - o Failure to include application rates for the land treatment units in the operating record
 - o Failure to amend closure and postclosure plans to reflect amended closure costs
 - o Postclosure plan failed to provide for groundwater monitoring and unsaturated zone monitoring activities
 - o Failure to maintain drum decant plant operation plan
 - o Inadequate Part A application; did not accurately describe all past, present and future treatment storage and disposal areas and capacities
 - o Inadequate Part B application; incomplete and inaccurate description of hazardous waste units at the facility

TSCA Enforcement Actions

- EPA CAFO filed November 29, 2010 (\$302,100 penalty)
 - o Failure to indicate removal from service date
 - o Failure to properly manifest (failed to include removal from service date or weight)
 - o Continued use (contamination in PCB building)
 - o Continued use (contamination in PCB building and adjacent slab)
 - o Improper disposal (contamination in soil around PCB building)
 - o Improper disposal (contamination in soil under concrete slab next to PCB building)

- NON issued June 26, 2007. The NON was related to NEIC's 2005 audit. The NON was issued to CWM for not properly calibrating instruments and analyzing PCBs improperly. In this case the PCB concentrations measured by CWM were being over estimated, but at concentrations less than 50 ppm.

- EPA CAFO filed May 3, 2005 (\$10,000 penalty; SEP \$37,500 – environmental equipment purchase for Kings County Environmental Health Services)
 - o Failure to perform monthly monitoring of lysimeters for presence of liquids

- NON issued September 10, 2004 (no penalty)
 - o CWM failed to submit Manifest Discrepancy reports as required.
 - o The NON was closed on May 26, 2005.

- EPA/DTSC CAFO dated November 7, 1985 (See RCRA entry above for penalty details)
 - o TSCA Complaint based on investigation conducted by NEIC (document not located)
 - o Violation - disposal of solid and liquid PCBs in a RCRA landfill cell not permitted to accept PCB waste.

Updated 1-9-2013

Lorentzen, Wayne@DTSC

From: Bowen, Patrice@DTSC <Patrice.Bowen@dtsc.ca.gov>
Sent: Friday, September 06, 2013 4:31 PM
To: bradley@greenaction.org
Cc: Ghazi, Rizgar@DTSC; Raphael, Debbie@DTSC; Lorentzen, Wayne@DTSC; Schumacher, Nathan@DTSC; Marxen, Jim@DTSC
Subject: RE:DTSC Notice for CWM Kettleman Hills Comment Period

Good afternoon Bradley,

Thank you for inquiring about the notifications that DTSC provided regarding the public hearing on the draft permit modification for the Chemical Waste Management Kettleman Hills facility. I would like to provide you additional information in response to your August 23rd e-mail regarding "defective and invalid notice." This information is being provided in addition to the September 4th letter you received from Rizgar Ghazi, DTSC Branch Chief, Office of Permitting. In serving in the role of Public Hearing officer and one of the decision makers on the Kettleman Chemical Waste Management permit modification proposal, Mr. Ghazi could not respond in any other way than to accept your e-mail as a formal public comment. As you requested Wayne Lorentzen, our Kettleman Project Manager, has entered your letter into the official public comment record.

Additionally, you raised the concern about informing the community on how to submit comments. The legally required documents for notification included the information for submitting comments. Please see the links below. Our Community Notice included contact information if the reader had further questions on any aspect of the permit process. To further inform the community on how to submit comments, we are holding the public hearing on September 18th, and will be sending to our entire mailing list information on how to submit written comments. This information will be mailed early next week. The final date for submitting written comments is October 11, 2013.

- Class 3 Permit Modification Fact Sheet <http://www.dtsc.ca.gov/HazardousWaste/Projects/upload/FINALEGLISHUpdatedFactSheet.pdf>
- Public Notice (English): http://www.dtsc.ca.gov/HazardousWaste/Projects/upload/Kettleman_PN_ExpansionDecision_CommentPeriodExtended_0813.pdf

Thank you,

Patrice Whisenant Bowen
Chief, Office of Communications
Department of Toxics Substances Control
(916)322-3800

Lorentzen, Wayne@DTSC

From: Bradley Angel <bradley@greenaction.org>
Sent: Friday, October 25, 2013 12:14 PM
To: Lorentzen, Wayne@DTSC
Cc: Raphael, Debbie@DTSC; Bradley Angel
Subject: Resending: Greenaction Exhibits for DTSC Comments on CWM KHF draft permit - attachment email number one
Attachments: RCRA CWM History 83 to present 110812-1.pdf; TSCA CWM History 83 to present 110812.pdf; DTSC CWM Kettleman Hills Facility Inspection-Enforcement History 1-9-2013.docx

To Wayne Lorentzen and DTSC,
My email with these attachments bounced back, so I am resending but removing the two emails from attachments that may have caused the problem and I pasted them into this email.
Please confirm you received these...thank you.

Bradley Angel

Re Can can you confirm the level of capacity at the Chem Waste hazardous waste landfill in January 2010.eml
Subject:

RE: Can you confirm the level of capacity at the Chem Waste hazardous waste landfill in January 2010

From:

"Lorentzen, Wayne@DTSC" <Wayne.Lorentzen@dtsc.ca.gov>

Date:

7/26/2013 9:42 AM

To:

<bradley@greenaction.org>

CC:

"Raphael, Debbie@DTSC" <Debbie.Raphael@dtsc.ca.gov>, "Johnson, Brian@DTSC" <Brian.Johnson@dtsc.ca.gov>, "Marxen, Jim@DTSC" <Jim.Marxen@dtsc.ca.gov>, "Ghazi, Rizgar@DTSC" <Rizgar.Ghazi@dtsc.ca.gov>, "Mataka, Arsenio@EPA" <Arsenio.Mataka@calepa.ca.gov>, <alatmig@netzero.com>, <Luis.Alejo@assembly.ca.gov>, <Bob.Fredenbug@asm.ca.gov>

Hi Bradley, the Kettleman Hills hazardous waste landfill (B-18) had less than 5% of permitted capacity remaining in January 2010 by our estimates.

Also, just want to remind you that we are in a public comment period that ends on September 4, 2013. The full administrative record is available from 8:00 a.m. to 5:00 p.m. at our Sacramento office, Mondays through Fridays, excluding state holidays. More information is also available at our website:

<http://www.dtsc.ca.gov/HazardousWaste/Projects/CWMISiteDescription.cfm>

<http://www.envirostor.dtsc.ca.gov/public/>

We invite you to the Open House on July 31 at 5:30 p.m. in the Kettleman City Elementary School Cafeteria where DTSC staff will be available to answer questions. We will also be available during the Drop In session on August 1 from 10:00 a.m. to 2:00 p.m. at the Kettleman City Community Center. The Public Hearing for the draft decision will be held on August 27, 2013 at 6:30 p.m. in the Kettleman City Elementary School Cafeteria.

Wayne Lorentzen, P.E.
Hazardous Substances Engineer
Department of Toxic Substances Control
8800 Cal Center Drive, Sacramento, CA 95826
(916) 255-3883
Wayne.Lorentzen@dtsc.ca.gov

From: Bradley Angel <bradley@greenaction.org>
Date: July 24, 2013, 12:14:04 PM PDT
To: Debbie Raphael <draphael@dtsc.ca.gov>, Jim Marxen <JMarxen@dtsc.ca.gov>, Arsenio Mataka <AMataka@calepa.ca.gov>
Cc: "alatmig@netzero.com" <alatmig@netzero.com>, "Alejo, Luis" <Luis.Alejo@assembly.ca.gov>, "Fredenburg, Bob" <Bob.Fredenburg@asm.ca.gov>
Subject: Can you confirm the level of capacity at the Chem Waste hazardous waste landfill in January 2010

Can you tell me how much capacity was left at the Kettleman Hills hazardous waste landfill in January 2010. For example, did they have 75% of their landfill capacity left or 25% or some other amount?

Thank you for a prompt response to this request.

Bradley Angel

Updated CWM-KHF compliance history compilation nov 8 2012 email from epa.eml
Subject:
Updated CWM-KHF compliance history compilation
From:
Morimoto.Kaoru@epamail.epa.gov
Date:
11/8/2012 12:52 PM
To:
bradley@greenaction.org
CC:
Vaile.Rich@epamail.epa.gov, Kabei.Arlene@epamail.epa.gov, Miller.Amy@epamail.epa.gov

Dear Mr. Angel,

Attached are the updated compliance history summaries for RCRA and TSCA-PCB at the CWM Kettleman

Hills facility. We have searched for all available files back to 1983, Although the Agency is generally required to retain compliance files for at most 10 years, we were able to find the majority of the records. There were some records older than 10 years we were not able to locate - please see the attached summaries for details.

If you have any questions please feel free to contact me at the number below.

Regards,

Kaoru

Kaoru Morimoto
US EPA Region 9
RCRA Enforcement Office, WST-3
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3306
(415) 947-3530 (fax)
=

----- Original Message -----

Subject:Greenaction Exhibits for DTSC Comments on CWM KHF draft permit - attachment email number one

Date:Fri, 25 Oct 2013 11:59:20 -0700

From:Bradley Angel <bradley@greenaction.org>

To:Wayne Lorentzen <WLorentz@dtsc.ca.gov>

CC:Debbie Raphael <draphael@dtsc.ca.gov>, Arsenio Mataka <AMataka@calepa.ca.gov>, Jim Marxen <JMarxen@dtsc.ca.gov>, Nathan Schumacher <NSchumac@dtsc.ca.gov>, "alatmig@netzero.com" <alatmig@netzero.com>, "alatmig@netzero.com" <alatmig@netzero.com>

Exhibit A - July 26, 2013 email from DTSC's Wayne Lorentzen to Bradley Angel; Greenaction
Exhibits B, C, D and E - DTSC and US EPA compilations of compliance history/violations at CWM

Lorentzen, Wayne@DTSC

From: Bradley Angel <bradley@greenaction.org>
Sent: Friday, October 25, 2013 12:17 PM
To: Lorentzen, Wayne@DTSC
Subject: Fwd: Greenaction Exhibits for Comments to DTSC on CWM KHF draft permits - attachment email number two
Attachments: Invalid public notice ---Fwd Community Notice and Notice for the Kettleman Hills Facility.eml; Kettlemanfinalcommunitynotice713.pdf; KettlemanEnglishCPECNotice final(8-7-13)-1.pdf

Wayne,
I am resending these attachment and pasted one of them into the email as it bounced back.
Please confirm your received these...thank you.

Bradley Angel

Re Can you tell me the accuracy of Chem Waste's comments reported inNY Times.eml

Subject:

Re: Can you tell me the accuracy of Chem Waste's comments reported inNY Times

From:

"Nathan Schumacher" <NSchumac@dtsc.ca.gov>

Date:

4/6/2010 2:11 PM

To:

"Bradley Angel" <bradley@greenaction.org>

CC:

"Joyce Whiten" <JWhiten@dtsc.ca.gov>, "Ruth Cayabyab" <RCayabya@dtsc.ca.gov>

Bradley,

No, Waste Management does not encase all its waste in cement. However, to minimize mobility of the waste, Waste Management does stabilize or solidify some waste before burying it in the landfill. According to our data, the amount of hazardous waste stabilized or solidified was 7% of the total placed in the hazardous waste landfill.

Nathan

Nathan Schumacher
Public Participation Specialist
DTSC
8800 Cal Center Drive
Sacramento CA 95826
(916) 255-3650
Toll Free (866) 495-5651

Bradley Angel <bradley@greenaction.org> 02/07/2010
11:30 AM >>>

Today's NY Times has a big story, as I am sure you know, about the situation in Kettleman City. Kit Cole of the company is quoted in the

article making the following statement.

"Ms. Cole said that the Kettleman Hills facility was safe and that a vast majority of the waste handled was run-of-the-mill garbage from municipalities. Only 60 acres was devoted to the most dangerous material, she said, including hazardous chemicals and byproducts from manufacturing and agriculture, which are stabilized in cement blocks before they are buried."

Can you tell me (1) How many acres have been used and are used for hazardous wastes and PCBs, and (2) if all the hazardous wastes and PCBs are "stabilized in cement blocks before they are buried."

----- Original Message -----

Subject:Greenaction Exhibits for Comments to DTSC on CWM KHF draft permits - attachment email number two

Date:Fri, 25 Oct 2013 11:59:32 -0700

From:Bradley Angel <bradley@greenaction.org>

To:Wayne Lorentzen <WLorentz@dtsc.ca.gov>

CC:Nathan Schumacher <NSchumac@dtsc.ca.gov>, Debbie Raphael <draphael@dtsc.ca.gov>, Jim Marxen <JMarxen@dtsc.ca.gov>, Arsenio Mataka <AMataka@calepa.ca.gov>, "alatmig@netzero.com" <alatmig@netzero.com>

Exhibit F: April 6, 2010 email from Nathan Shumacher, DTSC to Greenaction
Exhibit G: July 26, 2013 email from Bradley Angel, Greenaction to DTSC
Exhibits H and I: DTSC "Community Notices"

Final Notice

Lorentzen, Wayne@DTSC

From: Bradley Angel <bradley@greenaction.org>
Sent: Friday, July 26, 2013 3:38 PM
To: Schumacher, Nathan@DTSC; Raphael, Debbie@DTSC; Mataka, Arsenio@EPA; Rodriguez, Matthew@EPA
Cc: alatmig@netzero.com; ana@greenaction.org; Ingrid Brostrom; caroline farrell; Cesar mpos; Alejo, Luis; Fredenburg, Bob; Marxen, Jim@DTSC
Subject: Invalid public notice ---Fwd: Community Notice and Notice for the Kettleman Hills Facility
Attachments: KettlemanSpanish Community Notice (6-26-13).pdf; Kettlemanfinalcommunitynotice713.pdf; KettlemanfinalPublic Notice (6-25-13).pdf; KettlemanSpanishfinalPN (6-26-13).pdf

To Cal EPA/DTSC

I have finally been sent the notice for the public comment period and hearing on the Kettleman Hills landfill.

Today's date is July 26, yet I understand the comment period began 3 1/2 weeks ago on July 2nd and that is when you were legally required to provide me notice, yet failed to do so.

As you are well aware, I have been on the mandatory contact list for this facility for decades - yet you failed to provide me the required notice in a timely fashion.

I have also informed you that others who are also on your mandatory contact list never received the notice they were supposed to receive.

Therefore, your agency must rectify this problem and correct the notice defect, and the only way that can be done is to issue a new notice and start the public comment period over, with everyone legally required to receive notice receiving it in a timely fashion.

As it stands now, your comment period, notice, and scheduled "public hearing" are improper and will be challenged.

Bradley Angel

----- Original Message -----

Subject:Community Notice and Public Notice for the Kettleman Facility
Date:Fri, 26 Jul 2013 22:19:31 +0000
From:Schumacher, Nathan@DTSC <Nathan.Schumacher@dtsc.ca.gov>
To:Schumacher, Nathan@DTSC <Nathan.Schumacher@dtsc.ca.gov>

Attached for your consideration is the Community Notice and Public Notice for the Kettleman Hills Facility draft permit decision.

Thank you,

Nathan Schumacher

Public Participation Specialist
DTSC
8800 Cal Center Drive
Sacramento CA 95826
(916) 255-3650
Toll Free (866) 495-5651

COMMUNITY Notice

The mission of DTSC is to protect California's people and environment from harmful effects of toxic substances through the restoration of contaminated resources, enforcement, regulation and pollution prevention.

Public Comment Period Extended and Public Hearing Date Changed for Proposed Permit Modification at Chemical Waste Management, Kettleman Hills Facility



Public Comment Period



You may submit comments on these proposed changes on the Kettleman Hills Facility Permit. The Public Comment Period has been extended to end on **October 11, 2013.**

**Public Hearing
September 18, 2013
at 6:30 p.m.**

Cafeteria, Kettleman City
Elementary School, 701
General Petroleum Ave.
Kettleman City
California, 93239

On January 14, 2009, CWM initiated a 60-day public comment period and held a public meeting on February 10, 2009. The Department of Toxic Substances Control (DTSC) also issued a Community Notice in July 2013 announcing a public hearing scheduled for August 27, 2013, and a public comment period that ended on September 4, 2013. **This announcement re-schedules the public hearing on the draft decision to September 18, 2013, and extends the public comment period from September 4, 2013 to October 11, 2013.** The public hearing is held to solicit your input on DTSC's draft permit and draft decision to approve the permit modification.

Introduction

DTSC's Office of Permitting invites you to review and comment on a draft decision to approve a Class 3 Permit Modification for Chemical Waste Management's (CWM) Kettleman Hills Facility, located at 35251 Old Skyline Road near Kettleman City, California (CWM mailing address is Post Office Box 471 Kettleman City, California 93239). The permit modification would expand the permitted capacity of hazardous

waste landfill unit B-18 adding 5,000,000 cubic yards. CWM submitted this request because they are near their permitted capacity.

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The draft decision would add permit conditions to the current permit including:

- Compliance with the mitigation measures identified in the Subsequent Environmental Impact Report;
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Facility Background

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For more information

If you have questions, please contact the following staff:

Wayne Lorentzen, Project Manager
 8800 Cal Center Drive
 Sacramento CA 95826
 (916) 255-3883 or Wayne.Lorentzen@dtsc.ca.gov

Nathan Schumacher, Public Participation Specialist
 8800 Cal Center Drive
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 Toll free telephone number is (866) 495-5651

If you are a member of the media, please contact:

Russ Edmondson
 DTSC Public Information Officer
 (916) 323-3372 or Russ.Edmondson@dtsc.ca.gov

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Kings County Library, Hanford Branch

401 North Douty Street

Hanford CA 93230

(559) 582-0261

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Saturday: 12:00 p.m. to 5:00 p.m.

The full administrative record is available from 8:00 a.m. to 5:00 p.m. at our Sacramento office, Mondays through Fridays, excluding state holidays. All data submitted by Chemical Waste Management is available as part of the administrative record.

Department of Toxic Substances Control (Office of Permitting)

8800 Cal Center Drive

Sacramento, CA 95826

Please contact Amy Ly at (916) 255-4159 to make the necessary arrangements.

Information is also available at our website:

<http://www.dtsc.ca.gov/HazardousWaste/Projects/CWMI/SiteDescription.cfm>

<http://www.envirostor.dtsc.ca.gov/public/>

Notice for the Hearing Impaired

TDD users may obtain additional information by using the California State Relay Service at 711 or 1-(800) 735-2929 (TDD). Please ask them to contact Nathan Schumacher at (916) 255-3650 regarding the Kettleman Hills Facility.

Anuncio

Si prefiere hablar con alguien en español acerca de ésta información, favor de llamar a Jesus Cruz, Departamento de Control de Substancias Tóxicas.

El número de teléfono es (866) 495-5651

COMMUNITY Notice

The mission of DTSC is to protect California's people and environment from harmful effects of toxic substances through the restoration of contaminated resources, enforcement, regulation and pollution prevention.

You May Comment on DTSC's Draft Decision to Approve the Proposed Expansion of the Landfill at the Kettleman Hills Facility



Introduction

The Department of Toxic Substances Control (DTSC) Office of Permitting invites you to review and comment on a draft decision to approve a Class 3 Permit Modification for Chemical Waste Management's (CWM) Kettleman Hills Facility, located at 35251 Old Skyline Road near Kettleman City, California (CWM mailing address is Post Office Box 471 Kettleman City, California 93239). The permit modification would expand the permitted capacity of hazardous waste landfill unit B-18 adding 5,000,000 cubic yards. CWM submitted this request because they are near their permitted capacity.

Public Comment Period



Open House and Public Hearing

You may submit comments on these proposed changes to the Kettleman Hills Facility for 60-days. The Public Comment Period ends on **September 4, 2013**.

We also invite you to an Open House on **July 31, at 5:30 p.m.**, Cafeteria, Kettleman City Elementary School, 701 General Petroleum Ave. Kettleman City, California 93239

You may drop in to talk with DTSC staff on **August 1 from 10:00 a.m. to 2:00 p.m.** at the Kettleman City Community Center, 75 Fifth St., Kettleman City 93239

Public Hearing August 27, 2013 at 6:30 p.m. Cafeteria, Kettleman City Elementary School, 701 General Petroleum Ave. Kettleman City California, 93239

Previously, CWM issued a 60-day public comment period on January 14, 2009, and held a public meeting on February 10, 2009. This announcement opens a new 60-day comment period and DTSC will hold a public hearing on the draft decision on August 27, 2013. The public hearing will be held to solicit your input on DTSC's draft decision to approve the permit modification.

Draft decision would add permit conditions

The draft decision would add permit conditions to the current permit including:

- Compliance with the mitigation measures identified in the Subsequent Environmental Impact Report;
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Facility Background

Chemical Waste Management Incorporated operates the Kettleman Hills Facility as a permitted hazardous waste treatment, storage, and disposal facility on 499 acres of a 1,600 acre parcel. The Kettleman Hills Facility accepts virtually all solid, semi-solid, and liquid hazardous waste. It is not permitted to accept biological agents or infectious wastes, regulated radioactive materials, or compressed gases and explosives. Landfill B-18 is currently permitted as a hazardous waste landfill with 10,700,000 cubic yards of total capacity.

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For more information

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Introduction

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You may submit comments on these proposed changes to the Kettleman Hills Facility for 60-days. The Public Comment Period ends on **September 4, 2013**.

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El número de teléfono es (866) 495-5651

Public Notice

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PROPOSED PERMIT MODIFICATION Chemical Waste Management Kettleman Hills California

The Department of Toxic Substances Control (DTSC) invites you to review and comment on a proposed Class 3 Permit Modification to expand one of the Kettleman Hills Facility's landfill units. Chemical Waste Management, a subsidiary of Waste Management Incorporated (Waste Management), operates this facility. The facility is located at 35251 Old Skyline Road, 3 ½ miles southwest of Kettleman City, California, off State Highway 41.

WHAT DOES THIS MODIFICATION MEAN?

The permit modification, if approved, will increase the amount of hazardous waste Chemical Waste Management can place in the unit B-18 landfill. This modification adds about 14 usable landfill acres, increasing the capacity from 10,700,000 cubic yards to 15,700,000 cubic yards.

As required by California law, DTSC must review all permit modification requests and make a decision based on the merits. On this proposed permit modification, the facility conducted a 60-day public comment period and held a public meeting on February 10, 2009. With this notice, DTSC starts an additional public comment period for 60 days. Please submit your comments on the proposed permit modification by:

September 4, 2013

Please send your comments to:

Wayne Lorentzen
8800 Cal Center Drive
Sacramento CA 95826
Wayne.Lorentzen@dtsc.ca.gov

DTSC will hold a community Open House to answer community questions about this proposal. The Open House will be held:

July 31, 2013 at 5:30 p.m.
Kettleman City Elementary School Cafeteria
701 General Petroleum Avenue
Kettleman City CA 93239

In addition, DTSC will host a Drop in session to provide the community with another opportunity to ask questions and get more information about the project. The Drop in session will be held:

August 1, 2013 from 10:00 a.m. to 2:00 p.m.
Kettleman City Community Center
75 5th Street, Kettleman City, CA 93239



You may give written or verbal comment during the public hearing on:

August 27, 2013 at 6:30 p.m.
Cafeteria, Kettleman City Elementary School
701 General Petroleum Avenue
Kettleman City CA 93239

WHAT IS THE ENVIRONMENTAL IMPACT?

Under the California Environmental Quality Act (CEQA), DTSC must review and consider the potential environmental impacts from the proposed permit modification. The 2009 Kings County Final Subsequent Environmental Impact Report (FSEIR) State Clearinghouse No. 2005041064 was prepared by Kings County to analyze the project impacts. DTSC, acting as a Responsible Agency under CEQA, prepared an Addendum to the FSEIR to review and consider the FSEIR and the potential environmental impacts of the project. DTSC has also prepared a draft CEQA Findings of Fact and Statement of Overriding Considerations. If the project is approved, DTSC will file a Notice of Determination with the Governor's Office of Planning and Research State Clearinghouse to commence the 30-day statutory legal challenge period under CEQA for the project. The FSEIR, Addendum, and CEQA findings are available for inspection at the locations listed in this notice. The Proposed Class 3 Permit Modification application, the CEQA documents, and other supporting documents are located at the following locations:

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You may also review these documents on the DTSC web site. Please go to this web address:

<http://www.envirostor.dtsc.ca.gov/public/>. Please type in "Kettleman City" and click on "Get Report". Then, click on "Report" for Chemical Waste Management Inc. Also, you may review the full administrative record at:

California Department of Toxic Substances Control

8800 Cal Center Drive

Sacramento, California 95826

To make arrangements, please contact Amy Ly at (916) 255-4159.

For further information, please contact:

Nathan Schumacher

Public Participation Specialist

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ANUNCIO

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AVISO Comunitario

La misión del DTSC es de proteger a los residentes de California y al medio ambiente de los efectos nocivos de sustancias tóxicas a través de la restauración de recursos contaminados, la aplicación de regulaciones, y la prevención de la contaminación.

Usted Puede Comentar Sobre la Decisión Tentativa del Departamento de Control de Sustancias Tóxicas de Aprobar la Expansión Propuesta del Relleno Sanitario en Kettleman Hills



PERÍODO PARA COMENTARIOS DEL PÚBLICO



CASA ABIERTA (OPEN HOUSE) Y AUDIENCIA PÚBLICA

Usted puede presentar sus comentarios sobre estos cambios propuestos a las Instalaciones de Kettleman Hills (Kettleman Hills Facility) durante 60 días. El período de comentarios públicos termina el **04 de septiembre 2013**

También lo invitamos a una Casa Abierta (Open House) **julio 31 a las 5:30 p.m.**, Cafetería, Escuela Primaria Kettleman City, 701 General Petroleum Ave., Kettleman City, CA 93239

Puede pasar a platicar con el personal del DTSC el **1 de agosto de las 10:00 a.m. a las 2:00 p.m.** en el Centro Comunitario de Kettleman City, 75 Fifth St., Kettleman City, CA 93239

Audiencia Pública
Agosto 27, 2013 a las 6:30 p.m. Cafetería, Kettleman City Elementary School (Escuela Primaria Kettleman City), 701 General Petroleum Ave., Kettleman City, CA 93239

Introducción

La Oficina encargada de Otorgar Permisos del Departamento de Control de Sustancias Tóxicas (DTSC, por sus siglas en inglés) le invita a que estudie y comente sobre una decisión tentativa de aprobar un Permiso para una Modificación Clase 3 en las Instalaciones de Kettleman Hills de la compañía Chemical Waste Management (CWM, por sus siglas en inglés), ubicada en el 35251 Old Skyline Road, cerca de Kettleman City, California (el domicilio para correspondencia de CWM es: Post Office Box 471, Kettleman City, California 93239). La modificación del permiso ampliaría la capacidad permitida de este relleno sanitario de residuos peligrosos, unidad B-18, de 5,000,000 yardas cúbicas. CWM presentó esta petición, ya que se encuentran cerca de su capacidad permitida.

Anteriormente, el 14 de enero del 2009, CWM había emitido un aviso sobre un período de 60 días para comentarios del público, y había celebrado una junta pública el 1ero de Febrero del 2009. Este anuncio abre un nuevo período por 60 días para sus comentarios, y el DTSC celebrará una audiencia pública sobre la decisión tentativa, el 27 de agosto del 2013. La audiencia pública se llevará a cabo para pedirle a usted sus comentarios sobre la decisión tentativa del DTSC de aprobar la modificación del permiso.

La decisión tentativa agregaría condiciones al permiso actual, incluyendo:

- Cumplimiento con las medidas de mitigación que se identificaron en el Informe de Impacto Ambiental Subsecuente;
- Períodos de tiempo más largos para el muestreo del aire ambiente para la detección de PCBs;
- Una estación adicional de monitoreo del aire para tomar muestras del aire cuando el viento está soplando hacia Kettleman City;
- Reunión anual en Kettleman City para explicar los resultados del monitoreo ambiental;
- La construcción de un sistema de contención en el rack de muestras;
- Mayor muestreo y análisis del lixiviado en el relleno sanitario;
- Inspecciones anuales aéreas o en tierra de los rellenos sanitarios de residuos peligrosos activos, y cálculos mensuales del consumo de espacio aire en los rellenos sanitarios;
- Cumplimiento con los términos de una Opinión Biológica y una Declaración sobre las "Tomas" (muerte o perjuicio a vida silvestre amenazada) incidentales;
- Procedimientos específicos y notificaciones para reportar derrames, fugas y liberaciones al medio ambiente;
- Reducción de las emisiones de los camiones a diésel al admitir únicamente camiones del 2007 en adelante. A partir del 2018 se admitirían únicamente camiones del 2010 en adelante.

Antecedentes de las Instalaciones

Chemical Waste Management Incorporated opera las Instalaciones en Kettleman Hills, como unas instalaciones autorizadas para el tratamiento, almacenamiento y disposición de residuos peligrosos en 499 acres de una parcela de 1,600 acres. En las Instalaciones en Kettleman Hills se aceptan básicamente todos los residuos peligrosos sólidos, semi-sólidos y líquidos. No tiene permiso para aceptar agentes biológicos o residuos infecciosos, materiales radioactivos regulados, o gases comprimidos y explosivos. El Relleno Sanitario B-18 actualmente tiene permiso para operar como un relleno sanitario para residuos peligrosos con 10,700,000 yardas cúbicas de capacidad total.

Ley de Calidad Ambiental de California

De conformidad con la Ley de Calidad Ambiental de California (CEQA), El DTSC debe revisar y considerar los impactos ambientales potenciales que pueden resultar de la propuesta modificación al permiso. El Reporte de Kings County, Reporte Final de Subsecuentes Impactos Ambientales (FSEIR) Agencia de State Clearinghouse No. 2005041064 fue preparado por el Condado de Kings para analizar los impactos del proyecto. El DTSC, actuando como la Agencia Responsable bajo CEQA, preparo una adenda al reporte FSEIR para revisar y considerar el FSEIR y los impactos potenciales ambientales del proyecto. El DTSC también preparo un documento en borrador de los datos observados y (CEQA Findings of Fact) el documento de Datos Observados. Si se aprueba el proyecto, DTSC archivara una Nota de Determinación (NOD) con la Oficina del Gobernador de Planeamiento e Investigaciones Estatal (State Clearinghouse) para principiar el periodo legal de 30 días de desacuerdos y desafíos legales, bajo la Ley de Calidad Ambiental de California (CEQA) para este proyecto. La adenda del El FSEIR y el documento de los datos observados (Findings of Fact) estarán disponibles para su inspección en las ubicaciones listadas en este aviso.



Procedimientos para los Comentarios del Público

Durante el período para comentarios del público, todas las personas interesadas pueden presentar sus comentarios por escrito sobre el permiso tentativo. Todos los comentarios por escrito que se reciban serán considerados al tomar la decisión final. El DTSC llevará a cabo una audiencia pública. Cualquier persona podrá presentar declaraciones o datos en forma escrita o en forma oral sobre la modificación tentativa del permiso. Se fijará un límite de tiempo razonable para las declaraciones en forma oral que haga cada persona. Una transcripción por escrito de lo que se dijo durante la junta estará disponible para el público.

Cualquier persona que crea que alguna condición de la modificación tentativa del permiso es inapropiada, o que la decisión tentativa del DTSC de preparar una modificación tentativa del permiso es inapropiada, deberá plantear cualquier duda que tenga al respecto y presentar todos los argumentos y razones basadas en hechos que fundamenten su postura, incluyendo cualquier material de apoyo, antes de que concluya el período de tiempo para comentarios del público. Cualquier material que sirva de apoyo deberá incluirse en forma completa y no podrá incorporarse simplemente por hacer referencia al mismo, a menos que ya forme parte de las constancias administrativas, o que consista de leyes y regulaciones estatales o federales, o documentos de aplicación general del DTSC o de la EPA federal, o de otro material de referencia que generalmente está disponible. Quienes presenten comentarios deben asegurarse de que cualquier material de apoyo que no esté ya incluido en las constancias administrativas esté disponible para el DTSC, conforme a las indicaciones del DTSC. El período de tiempo para comentarios ha sido ampliado en 60 días para darles a quienes deseen hacer comentarios una oportunidad razonable de presentar sus materiales de apoyo. Después de considerar todos los comentarios, el DTSC emitirá una respuesta a los comentarios, misma que estará disponible para el público.

Para mayor información

Si tiene usted preguntas, por favor comuníquese con el personal que se indica a continuación:

Wayne Lorentzen, Encargado del Proyecto
8800 Cal Center Drive
Sacramento, CA 95826
(916) 255-3883 o Wayne.Lorentzen@dtsc.ca.gov

Nathan Schumacher
Especialista en Participación Pública
8800 Cal Center Drive
Sacramento, CA 95826
(916) 255-3650 o sin costo (866) 495-5651
Nathan.Schumacher@dtsc.ca.gov

Si es usted miembro de la prensa ú otros medios, por favor comuníquese con:

Russ Edmondson
Funcionario de Información Pública de DTSC
(916) 323-3372
Russ.Edmondson@dtsc.ca.gov

Los documentos se pueden estudiar en estos lugares

La solicitud para la Modificación Propuesta del Permiso Clase 3, el permiso tentativo, la hoja de datos que contiene información más detallada y otros documentos de apoyo se encuentran en los siguientes lugares:

Biblioteca de Kings County, Sucursal Kettleman City
104 Becky Pease St.
Kettleman City, CA 93239
Eugenie Todd, Bibliotecaria
(559) 386-9804
Horario:
Domingo: Cerrado
Lunes: Cerrado
Martes: 1:00 p.m. a 6:00 p.m.
Miércoles: 1:00 p.m. a 6:00 p.m.
Jueves: 1:00 p.m. a 6:00 p.m.
Viernes: Cerrado
Sábado: Cerrado



Biblioteca de Kings County, Sucursal Avenal

501 Kings Street

Avenal CA 93204

(559) 386-5741

Horario:

Fines de semana: Cerrado

Lunes: 11:00 a.m. a 8:00 p.m.

Martes: 11:00 a.m. a 7:00 p.m.

Miércoles: 11:00 a.m. a 7:00 p.m.

Jueves: 12:00 p.m. a 5:00 p.m.

Viernes: 1:00 p.m. a 5:00 p.m.

Biblioteca de Kings County, Sucursal Hanford

401 North Douty Street

Hanford CA 93230

(559) 582-0261

Horario:

Domingo: Cerrado

Lunes: 10:00 a.m. a 8:00 p.m.

Martes: 10:00 a.m. a 8:00 p.m.

Miércoles: 10:00 a.m. a 8:00 p.m.

Jueves: 10:00 a.m. a 6:00 p.m.

Viernes: 12:00 p.m. a 5:00 p.m.

Sábado: 12:00 p.m. a 5:00 p.m.

Toda la documentación administrativa se encuentra disponible de 8:00 a.m. a 5:00 p.m. en nuestras oficinas en la ciudad de Sacramento, de lunes a viernes, excepto los días festivos estatales. Toda la información que presentó Chemical Waste Management se encuentra disponible como parte de la documentación administrativa.

DTSC (Oficina de Otorgamiento de Permisos)

8800 Cal Center Drive

Sacramento, CA 95826

Por favor, comuníquese con Amy Ly al (916) 255-4159

para hacer los arreglos necesarios.

También hay información disponible en nuestro portal:

<http://www.dtsc.ca.gov/HazardousWaste/Projects/CWMI/SiteDescription.cfm>

<http://www.envirostor.dtsc.ca.gov/public/>

Aviso para Personas con Problemas de Audición

Los usuarios de TDD pueden obtener información adicional usando el servicio California State Relay Service, marcando el 711 o 1-(800) 735-2929 (TDD).

Por favor pida que se comuniquen con Nathan Schumacher al (916) 255-3650 en relación a las Instalaciones en Kettleman Hills (Kettleman Hills Facility).



Aviso Publico

La misión del DTSC es de proteger a los residentes de California y al medio ambiente de los efectos nocivos de sustancias tóxicas a través de la restauración de recursos contaminados, la aplicación de regulaciones, y la prevención de la contaminación.

PROPUESTA MODIFICACION AL PERMISO Chemical Waste Management Kettleman Hills California

El Departamento de Control de Sustancias Tóxicas (DTSC por sus siglas en Inglés) le invita a revisar y comentar la sobre la Propuesta Modificación para ampliar una de las unidades del vertedero de la instalación de Kettleman Hills. Chemical Waste Management, una de las subsidiarias de Waste Management Incorporated (Waste Management por su nombre comercial), opera esta instalación. La instalación está ubicada en el 35251 Old Skyline Road, 3 ½ millas al suroeste de Kettleman City, California, a la salida de la carretera estatal 41.

¿Qué significa esta modificación?

La modificación del permiso, si es aprobada, aumentara la cantidad que Chemical Waste Management podrá depositar de desperdicios peligrosos en la unidad Vertedero B-18. Esta modificación añade aproximadamente 14 acres de vertedero utilizable para este uso, aumentando la capacidad del vertedero de 10.700.000 yardas cubicas a 15.700.000 yardas cubicas.

Como lo requiere la ley de California, DTSC debe revisar todas las solicitudes de modificación y de tomar una decisión basada en los méritos. En esta modificación del permiso propuesto, la instalación llevó a cabo un período de comentarios públicos de 60 días y llevó a cabo una reunión pública el 10 de febrero de 2009. Con este aviso, DTSC comienza un nuevo período de comentarios públicos de 60 días. Por favor, envíe sus comentarios sobre la modificación al permiso propuesta a partir del:

04 de septiembre 2013

Envíe sus comentarios a:

Wayne Lorentzen

8800 Cal Center Drive

Sacramento CA 95826

Wayne.Lorentzen@dtsc.ca.gov

DTSC celebrará una junta pública de puertas abiertas a la comunidad para responder a las preguntas de la comunidad acerca de esta propuesta. La junta publica de puertas abiertas se llevará a cabo:

31 de julio 2013 a las 5:30 p.m.

Kettleman City, en la Cafetería de la Escuela Primaria

701 General Petroleum Avenue

Kettleman City CA 93239

Además, DTSC celebrará una sesión de puertas abiertas para proporcionar a la comunidad con otra oportunidad para hacer preguntas y obtener más información sobre el proyecto. La sesión de puertas abiertas se llevará a cabo:

1 de agosto 2013 de 10:00 a.m. a 2:00 p.m.

Kettleman City Community Center (Centro de la Comunidad de Kettleman)

75 5th Street,

Kettleman City, CA 93239



Usted puede dar comentario escrito o verbal durante la audiencia pública el día:

27 de agosto 2013 a las 6:30 p.m.

En la Cafetería de la Escuela Primaria de Kettleman City
701 General Petroleum Avenida
Kettleman City CA 93239

¿Cuál es el impacto ambiental?

De conformidad con la Ley de Calidad Ambiental de California (CEQA), El DTSC debe revisar y considerar los impactos ambientales potenciales que pueden resultar de la propuesta modificación al permiso. El Reporte de Kings County, Reporte Final de Subsecuentes Impactos Ambientales (FSEIR) Agencia de State Clearinghouse No. 2005041064 fue preparado por el Condado de Kings para analizar los impactos del proyecto. El DTSC, actuando como la Agencia Responsable bajo CEQA, preparo una adenda al reporte FSEIR para revisar y considerar el FSEIR y los impactos potenciales ambientales del proyecto. El DTSC también preparo el documento de la Declaración de los Determinaciones de Hechos de CEQA (CEQA Findings of Fact). Si se aprueba el proyecto, DTSC archivara una Nota de Determinación (NOD) con la Oficina del Gobernador de Planeamiento e Investigaciones Estatal (State Clearinghouse) para principiar el periodo legal de 30 días de desacuerdos y desafíos legales, bajo la Ley de Calidad Ambiental de California (CEQA) para este proyecto.. La adenda del El FSEIR y el documento de Determinaciones de Hechos (Findings of Fact) estarán disponibles para su inspección en las ubicaciones listadas en este aviso.

La propuesta solicitud al Permiso Clase 3 de Modificación al Permiso, los documentos de CEQA y otros documentos de apoyo se encuentran en los siguientes lugares:

Biblioteca Pública de Avenal, 501 E. Kings Street, Avenal, CA 93204: (559) 386-5741

Horario: Lunes 11:00 a.m. a 8:00 p.m., martes y miércoles 11:00 a.m. a 7:00 p.m.
jueves 12:00 p.m. a 5:00 p.m., viernes 1:00 p.m. a 5:00 p.m.

Biblioteca Pública de Hanford, 401 N. Douty Street, Hanford, CA 93230: (559) 582-0261

Horario: lunes, martes y miércoles 10:00 a.m. a 8:00 p.m.
jueves 10:00 a.m. a 6:00 p.m., viernes y sábados 12:00 p.m. a 5:00 p.m.

Biblioteca Pública de Kettleman, 104 Becky Pease Street, Kettleman City, CA 93239: (559) 386-9804

Horario: martes, miércoles y jueves de 1:00 p.m. a 6:00 p.m.

También puede revisar estos documentos en el sitio web del DTSC. Por favor, vaya a la siguiente dirección web: <http://www.environmental.dts.ca.gov/public/>. Por favor escriba "Kettleman City" y haga clic en "Get Report". A continuación, haga clic en "Informe" de Chemical Waste Management Inc. También, usted puede revisar el expediente administrativo completo en:

Departamento del Control de Sustancias Tóxicas (DTSC por sus siglas en Ingles)

8800 Cal Center Drive

Sacramento, California 95826

Para hacer una cita para revisar los documentos, por favor póngase en contacto con Amy Ly al (916) 255-4159.

Para más información, póngase en contacto con:

Nathan Schumacher
Especialista en Participación Pública
8800 Cal Center Drive 8800 Cal Center Drive
Sacramento, CA 95826
(916) 255-3650
Línea gratuita: (866) 495-5651
Nathan.Schumacher@dts.ca.gov

Wayne Lorentzen
Gerente del Proyecto
8800 Cal Center Drive
Sacramento, CA 95826
(916) 255-3883
Wayne.Lorentzen@dts.ca.gov

Si es usted miembro de la prensa ú otros medios, por favor comuníquese con:

Russ Edmondson
Funcionario de Información Pública de DTSC
(916) 323-3372
Russ.Edmondson@dts.ca.gov

AVISO A PERSONAS CON DISCAPACIDAD AUDITIVA

Se puede obtener información adicional utilizando el Servicio de Retransmisión de California al 1-888-877-5378 (TDD). Pídale ponerle en contacto con Nathan Schumacher al (916) 255-3650 con respecto a la instalación de Kettleman Hills.

CWM Kettleman Hills Facility
U.S. Environmental Protection Agency
RCRA Compliance Evaluation Inspections and Enforcement - 1983 to Present
(WST-3 working document - based on information from RCRAInfo and available Regional Office records)

Date Inspected	Potential Violations/Comments	Informal Enforcement Action Resolution Date (matter resolved without penalty – e.g. warning letter, return to compliance)	Formal Enforcement Action Resolution Date (matter resolved with penalty)	Penalty
11/12/10	None. Note: EPA HQ air monitoring inspection of surface impoundments	Not applicable (n/a)	n/a	n/a
2/8-12/10 and 3/1-3/10	Inspection report <ul style="list-style-type: none"> • Failure to make hazardous waste determinations for land disposal • Impermissible land disposal of prohibited waste • Failure to comply with hazardous waste permit • Failure to close containers of hazardous waste • Failure to maintain and operate facility to minimize releases 	n/a (see next column)	8/23/11	\$400,000 plus \$600,000 compliance tasks
12/6-15/05	NEIC inspection <ul style="list-style-type: none"> • Failure to make hazardous waste determinations for land disposal • Impermissible land disposal of prohibited waste • Failure to comply with hazardous waste permit 	n/a (see next column)	2010 settlement (see above record) addressed the potential violations from this inspection.	2010 settlement (see above record) addressed the potential violations from this inspection.
10/15/04	Subtitle D only – None	n/a	n/a	n/a
9/8/99	None	n/a	n/a	n/a
2/12/97	Inspection report <ul style="list-style-type: none"> • Two containers in DSU were not closed • Eight containers processed in FSU did not meet LDR exemption criteria (were not less than 500 ppm volatile organics) 	No record found ¹	n/a	n/a

¹ Inspection records and warning letters are only required to be retained for 5 years for inspections where only minor violations are detected (EPA records retention schedule)

CWM Kettleman Hills Facility
U.S. Environmental Protection Agency
RCRA Compliance Evaluation Inspections and Enforcement - 1983 to Present
 (WST-3 working document - based on information from RCRAInfo and available Regional Office records)

5/1-3/95	<p>Inspection report</p> <ul style="list-style-type: none"> • Training program – lab tech. was not able to explain how he would respond to a fire • Fire extinguisher behind maintenance building was not recently inspected 	10/13/95	n/a	n/a
4/5/94	<p>Inspection report</p> <ul style="list-style-type: none"> • Containers with LDR waste were stored for greater than 1 year • 12 containers were not marked with the words “Hazardous Waste” 	10/19/94	n/a	n/a
4/23/93	<p>Inspection report</p> <ul style="list-style-type: none"> • Containers were not in good condition • Containers were stored adjacent to containers holding incompatible wastes • Wastes were stored with less than 2.5 feet of aisle space • The profile number on a container did not match the profile number on the manifest • Containers with LDR waste were stored for greater than 1 year 	12/14/93	n/a	n/a
5/14/92	None	n/a	n/a	n/a
11/26-27/91	Inspection report could not be located. ² Date of inspection was listed in RCRAInfo	5/12/92	n/a	n/a
2/8-9/89	<p>Inspection report</p> <ul style="list-style-type: none"> • Waste Analysis Plan not updated for LDR • Manifest discrepancies • Containers not marked w/accumulation start date • Records of notifications of restricted waste not maintained • Landfill not managed to prevent wind dispersal • Placement of listed waste in landfill prior to treatment verification 	4/24/89	n/a	n/a
n/a	<p>Administrative Order on Consent to address March 1988 slope stability failure on Phase 1-A of landfill B-19. Tasks included:</p> <ul style="list-style-type: none"> • Submittal of preliminary reports on leachate and groundwater collected 	n/a	9/20/88 - 3013 Order	n/a

² Inspection records and warning letters are only required to be retained for 5 years (EPA records retention schedule)

CWM Kettleman Hills Facility
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	<p>from landfill B-19 system</p> <ul style="list-style-type: none"> • Submittal of quarterly report of analysis of leachate removed from Phases 1-A and 1-B of landfill B-19 • Installation of temporary geosynthetic liner system in the wedge between filled areas of landfill B-19, Phases 1-A and 1-B • Implementation of construction quality assurance procedures and methods during construction of the liners in the wedge unit • Submittal of a Wedge Material Transfer Plan • Transfer hazardous waste temporarily stored in the wedge unit to the Phase II or Phase III area for final disposal • Submittal of a Landfill B-19, Phase 1-A Investigation Plan to determine the nature and extent of the damage caused by the slope stability failure to Phase 1-A landfill system • Transfer the waste from Phase 1-A of landfill B-19 • Submittal of a Repair Plan for the repair of any portions of the landfill system for Phase 1-A which requires repair or a demonstration that no repairs to Phase 1-A are necessary 	n/a	n/a	n/a
n/a	<p>Copy of 3008H Order could not be located. Order date was listed in DTSC's inspection report (9/15-16/09 inspection). Order, as summarized in the 2009 DTSC inspection report, directed CWM to:</p> <ul style="list-style-type: none"> • Perform a RFI to determine nature and extent of any releases of hazardous wastes/constituents at or from the facility • Perform a Corrective Measures Study to identify/evaluate alternatives for corrective action necessary to prevent or mitigate any migration or release of hazardous wastes/constituents at or from the facility 	n/a	2/24/87 – 3008H Order	n/a
4/21/86	<p>Inspection report</p> <ul style="list-style-type: none"> • Waste Analysis Plan did not specify sampling protocol for incoming drums • Containers not managed to prevent leakage 	No record found ³	n/a	n/a

³ Inspection records and warning letters are only required to be retained for 5 years (EPA records retention schedule)

CWM Kettleman Hills Facility
U.S. Environmental Protection Agency
RCRA Compliance Evaluation Inspections and Enforcement - 1983 to Present
(WST-3 working document - based on information from RCRAInfo and available Regional Office records)

	<ul style="list-style-type: none"> • Waste in containers in poor condition not transferred to other containers • Earthen berms not protected from erosion 	No record found ⁴	n/a	n/a
6/13-14/85	<p>Inspection report</p> <ul style="list-style-type: none"> • Certifications of partial closure not submitted • Plans for partial closure not submitted • Inadequate waste tracking • Incomplete facility inspection checklists • Leaking container 			
5/23-24/84 & 3/21- 4/18/84	<p>Inspection report could not be located.⁵ Dates of inspection were listed in the enforcement action. The potential violations identified in the enforcement action</p> <ul style="list-style-type: none"> ○ Failure to implement a groundwater monitoring program ○ Failure to implement an unsaturated zone monitoring program ○ Closure plan did not include a description of how and when the facility would be partially closed ○ Closure of units without addressing units in the closure plan and without demonstrating how the closure of the units met closure performance standard conditions ○ Substantial Modifications of the facility in violation of the permit ○ Failure to develop and follow a written WAP ○ Failure to collect representative samples of bulk liquid loads ○ Failure to follow the WAP (samples collected by the truck drivers, not facility personnel) ○ Mandatory analyses were not routinely conducted ○ Failure to follow pre-acceptance procedures and initial detailed chemical and physical analysis 	n/a (see next column)	<ul style="list-style-type: none"> ▪ Complaint - 7/3/84 ▪ Amended Complaint - 6/5/85 ▪ Final Order - 11/7/85 	\$2,103,000 for TSCA & RCRA

⁴ Inspection records and warning letters are only required to be retained for 5 years (EPA records retention schedule)

⁵ Inspection reports and enforcement records are only required to be retained for 10 years for cases involving serious violations (EPA records retention schedule)

CWM Kettleman Hills Facility
U.S. Environmental Protection Agency
RCRA Compliance Evaluation Inspections and Enforcement - 1983 to Present
(WST-3 working document - based on information from RCRAInfo and available Regional Office records)

	<ul style="list-style-type: none"> ○ Failure to minimize the possibility of unauthorized entry (2 gates were not secured and appropriate warning signs were not posted) ○ Inspection schedule failed to include seven units ○ Inspection records failed to include records of repairs or other remedial actions ○ Weekly inspection records were missing ○ Inspection records did not include inspections of run-on and run-off controls for the landfills and land treatment ○ Inspection records did not include measures for controlling wind dispersion of hazardous waste from the landfills ○ Inspection records did not include inspection of the perimeter fence ○ Inspection records did not include daily inspections of freeboard level and the surface impoundments ○ Operating record did not indicate method and date of treatment, storage and/or disposal ○ Failure to maintain records of internal waste transfers ○ Failure to keep records of the amount, type, date, and disposal location of hazardous wastes generated at the truck wash station ○ Failure to maintain sufficient freeboard at the surface impoundments ○ Failure to have protective cover on surface impoundment earthen dikes ○ Potentially incompatible wastes were placed in surface impoundments without developing waste analyses, trial treatment tests or treatment and compatibility results ○ Potentially incompatible wastes were placed in surface impoundments without documenting how the facility complied with 265.17(b) and Item 7(b) Part III of the permit. ○ Failure to maintain maps for landfills B-10 and B-11 and contents and locations of hazardous waste within each cell for landfills B-6, B-9, B-10, B-11 and B-13 in the operating record. ○ Failure to demonstrate that bulk liquid wastes were treated or 		
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CWM Kettleman Hills Facility
U.S. Environmental Protection Agency
RCRA Compliance Evaluation Inspections and Enforcement - 1983 to Present
 (WST-3 working document - based on information from RCRAInfo and available Regional Office records)

	<p>stabilized prior to disposal so that free liquids were no longer present</p> <ul style="list-style-type: none"> ○ Failure to demonstrate that reactive bulk liquid wastes were treated, rendered or mixed before or immediately after disposal to make them non-reactive ○ Placement of containerized liquid waste in landfills for 58 days ○ Hazardous waste not amenable to biological degradation or chemical reactions in the soil were applied to land treatment units; failure to conduct studies to characterize the waste to determine suitability for land treatment ○ Application of hazardous waste to land treatment units without determining constituent concentrations ○ Failure to include application rates for the land treatment units in the operating record ○ Failure to amend closure and postclosure plans to reflect amended closure costs ○ Postclosure plan failed to provide for groundwater monitoring and unsaturated zone monitoring activities ○ Failure to maintain drum decant plant operation plan ○ Inadequate Part A application; did not accurately describe all past, present and future treatment storage and disposal areas and capacities ○ Inadequate Part B application; incomplete and inaccurate description of hazardous waste units at the facility 	n/a (see next column)	1985 settlement (see above record) addressed the potential violations from this inspection.	1985 settlement (see above record) addressed the potential violations from this inspection.
4/13-14/83	<p>Inspection report</p> <ul style="list-style-type: none"> ● WAP deficiencies (parameters, test methods, sampling methods, frequency, procedures) ● Personnel training does not cover hazardous waste management procedures ● Contingency plan deficiencies (facility actions, arrangements, emergency equipment, evacuation plan) ● Groundwater waiver demonstration deficiencies (consideration of runoff and infiltration in water balance evaluation, evaluation of properties of 			

CWM Kettleman Hills Facility
U.S. Environmental Protection Agency
RCRA Compliance Evaluation Inspections and Enforcement - 1983 to Present
(WST-3 working document - based on information from RCRAInfo and available Regional Office records)

	<ul style="list-style-type: none">• saturated and unsaturated zones• Closure and post-closure plan deficiencies (general, landfill, land treatment)			
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CWM Kettleman Hills Facility
U.S. Environmental Protection Agency
TSCA-PCB Inspections and Enforcement - 1983 to Present
 (WST-3 working document - based on available Regional Office records)

Date Inspected	Potential Violations/Comments	Informal Enforcement Action Resolution Date (matter resolved without penalty - e.g. warning letter, return to compliance)	Formal Enforcement Action Resolution Date (matter resolved with penalty)	Penalty
Not applicable (n/a)	Self disclosure • Landfill leachate was placed in a hazardous waste surface impoundment prior to analysis	n/a (see next column)	9/7/12	\$9,375
6/2/10 and 2/8-12/10	Inspection report • Failure to indicate removal from service date • Failure to properly manifest (failed to include removal from service date or weight) • Continued use (contamination in PCB building) • Continued use (contamination in PCB building and adjacent slab) • Improper disposal (contamination in soil around PCB building) • Improper disposal (contamination in soil under concrete slab next to PCB building)	n/a (see next column)	11/29/10	\$302,100
12/6-15/05 and 8/22-23/05	NEIC inspection. 6/26/07 Notice of Noncompliance (NON) - Over-calibration of PCB testing equipment	2/4/08	n/a	n/a
n/a	Record review • Failure to perform monthly monitoring of lysimeters for presence of liquids	n/a (see next column)	5/3/05	\$10,000 plus \$37,500 Supplemental Environmental Project
n/a	9/10/04 NON - CWM failed to submit manifest discrepancy reports	5/26/05	n/a	n/a

TSCA CWM HIST. 83 TO PRESENT

CWM Kettleman Hills Facility
U.S. Environmental Protection Agency
TSCA-PCB Inspections and Enforcement - 1983 to Present
 (WST-3 working document - based on available Regional Office records)

4/14/04	None	n/a	n/a	n/a	n/a
8/30/02	None	n/a	n/a	n/a	n/a
10/25-26/01	None	n/a	n/a	n/a	n/a
10/14-15/98	None	n/a	n/a	n/a	n/a
4/8/97	None	n/a	n/a	n/a	n/a
6/18/96	None	n/a	n/a	n/a	n/a
8/31/95	None	n/a	n/a	n/a	n/a
12/8/93	None	n/a	n/a	n/a	n/a
Date not found	Inspection report shredded by TSCA Confidential Business Information (CBI) Document Control Officer on 9/24/99. ¹ (Document R9-91-010 logged in 7/23/91; Document R9-92-004 logged in 3/16/92 – copy of document R9-91-010). This information was obtained from the database on the computer in the TSCA CBI room.	No record found ²	No record found ³	No record found ⁴	No record found ⁴
3/21 – 4/18 1984	Inspection report could not be located. ⁵ Dates of inspection and details of the potential violations were listed in the enforcement action. <ul style="list-style-type: none"> • No individual landfill grid sheet for seven shipments of PCBs • Facility received seventy-seven shipments of PCBs for placement in PCB cell prior to receiving approval for waiver of fence requirement • Seven shipments of PCB liquids were placed in the PCB landfill • A shipment containing less than 500 ppm of PCBs was solidified for placement in the PCB landfill • Three shipments of PCBs were disposed of in RCRA landfill cell B-15 vs an approved PCB incinerator • A shipment of PCBs were disposed of in RCRA landfill cell B-15 vs an approved PCB landfill 	n/a (see next column)	Complaint - 6/5/85 • Final Order - 11/7/85	\$2,103,000 for TSCA & RCRA	

¹⁻⁵ Inspection and enforcement records are only required to be retained for 10 years (EPA records retention schedule)

**CWM Kettleman Hills Facility
U.S. Environmental Protection Agency
TSCA-PCB Inspections and Enforcement - 1983 to Present
(WST-3 working document - based on available Regional Office records)**

<p>4/13-14/83</p>	<p>Inspection report</p> <ul style="list-style-type: none"> • PCB storage container design not reviewed to determine effect on structural safety from placing PCB liquids in the container • SPCC plan has not been prepared for 10,000-gallon PCB storage container • Inadequate records of the quantity of each batch of PCBs added to the 10,000-gallon PCB storage container • Facility failed to give written notices to the State and local agencies at least 30 days before the facility was used for the disposal of PCBs • Incomplete three dimensional burial coordinate records for PCB items • Facility does not intend to install a 6-ft fence around landfill B-16 • 1981 PCB Annual Document did not completely identify the specific types of PCBs and PCB items disposed of 	<p>No record found⁶</p>	<p>No record found⁷</p>	<p>No record found⁸</p>
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⁶⁻⁸ Inspection and enforcement records are only required to be retained for 10 years (EPA records retention schedule)

5470**Lorentzen, Wayne@DTSC**

From: James Dowdall <jkdowd63@yahoo.com>
Sent: Friday, October 25, 2013 3:33 PM
To: Lorentzen, Wayne@DTSC
Subject: Permit For Landifll B-18 Expansion

Message to DTSC:

For many years Greenaction (aka Bradley Angel) and their minority affiliates have been abusing the permitting process in an attempt to close and permanently shut down the Chemical Waste Management, Inc. Kettleman Hills Facility. They have used every trick in the book and now baby (from Donovan's Sunshine Superman 1966 song) to destroy the facility!

Let us also be honest. Isn't the official language of our country English. Then why don't all the people in this country communicate in English? I've personally attended meetings where I know that those that communicate in Spanish in the public hearings/meetings can perfectly speak English! What is the point of this deception? Anyone who can speak English should be required by law to address the public in English! What do you think we live in? Mexico?

I thought this was the United States of America where English is the official language!

Greenaction and their minority in numbers and not in race or nationality, have falsely accused the facility of causing birth defects, asthma, cancer, and other health affects that are in no way related to the operation of the facility and you know it! No scientific evidence has ever been presented to demonstrate that the facility has affected any person offsite!

I formally request that the Department of Toxic Substances Control lawyers review the recent permitting process for the Landfill B-18 Expansion project. It is my opinion, and you know that it is a correct one, that the enemies of the Kettleman Hills Facility, are deliberately using the permitting process for the Landfill B-18 Expansion to permanently close down the facility. There, I said it, and you at the DTSC agency know it but would not say it because it is politically incorrect to do so!

In the first place, Mckay Trucking was given a permit to dispose waste in the Kettleman Hills because it was a relatively remote oil field not near any populated centers. It was on older geologic formations, isolated from groundwater in the Kettleman Plains and the San Joaquin Valley. Chemical Waste Management, Inc. didn't even own the property when it was first sited there! Kings County, the responsible government agency, did an excellent job in siting the disposal facility for McKay Trucking where they did because of the geological, geographic, and meteorological conditions (wind direction from north to south away from Kettleman City most of the time) that were known to exist, and still do, at this location.

The waste disposal location was never sited at Kettleman Hills because Kings County looked at the Mexican population, and decided to locate it there because they were expendable! At this time, this is an absolutely ridiculous argument to make. Also at this time, based upon all the air monitoring and groundwater monitoring data that exists at this time related to the Chemical Waste Management, Inc. Kettleman Hills Facility, clearly shows that no health affects espoused by any resident in Kettleman City is any way related to the operation of the Kettleman Hills Facility.

Any further delay in the permitting process can only be viewed as a communistic attack on a free valid free market enterprise in the United States of America to destroy jobs, our economy, and our

beloved country. Did you were investigate the funding of the groups that oppose permitting at the Kettleman Hills Facility. Who are they and who are they funded by?

If the facts of science, based upon valid monitoring data and valid scientific assessments does not rule in the decision making process, than what does? If human emotion and hysteria rule, than we are ruled by the heat of the moment, and not by human reason. And this absolutely appears to be the case for permitting at the Kettleman Hills Facility. If politics and political correctness is to be used, than the facility must absolutely be closed. But, if science and technology rules, than the facility must absolutely be permitted, without any further delay or appeals, to continue to operate!

But, I do not believe that the DTSC shirked its duties. As a matter of fact, I believe they went way beyond what the regulations required to protect the people of Kettleman City, whether some of them may be illegal aliens or not. The fact is that the DTSC statements in public documents and correspondence is correct! The Kettleman Hills Facility can be permitted for the Landfill B-18 Expansion because all scientific data, monitoring data, human and health risk assessments clearly show that it can be safety operated to protect human health and the environment. The Landfill B-18 Expansion should be permitted without delay. Any further delays through appeals or any other "legal" processes should not be considered unless valid monitoring data can clearly show that the facility has adversely affected anyone offsite. Without such data or scientific evidence, nothing could possibly hold up in a court of law. Facts must be presented, not fiction!

James K. Dowdall
California Registered Geologist No. 4830
jkdowd63@yahoo.com

(559) 322-8721

5471

Fecha: Oct 18, 2013

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Tengo 67 años y he vivido en Kettleman City más de la mitad de mi vida, y he luchado en contra de la planta toxica mas grande del estado y posible mente del país. Tenemos muchas ramas ambientales, que supuestamente nos protegen. Pero en donde esta una sola que nos defiende, todas se iluminan con el dinero que ganan. Por favor nieguen el permiso para la expansión de este vertedero toxico. a costa de la salud de gente inocente, que la combencen con una camiseta o con una serbega. Gente que sinceramente es de Kettleman City, por eso no les importa si le dan mas expansión al fin que esa gente se va mañana. pero los residentes que tenemos casa o muchos años

Ramon Mates
Nombre

Ramon Mates
Firma

PO Box 262
Kettleman City, CA 93239

(559) 362-0865

RECEIVED
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SUBSTANCES CONTROL
2013 OCT 25 PM 3:15
CLOVIS REGIONAL OFFICE

(Handwritten signature)

Octubre 18 de 2013
 529 King St PO BOX 262
 Kettleman city Ca 93239
 Tel Cel (559)362-0865

queremos seguir viviendo con tranquilidad.
 y no con miedo de tantos venenos así que
 espero que por una vez esas agencia que se
 disen caidan el ambiente de verdad agan su
 trabajo, y que nos protejan porque para eso
 los pusieron. miren como a sufrido Kettleman city
 con tanto cancer asma problemas de toda clase.
 de enfermedades niños con defectos de nacimiento.
 muriendo vengan x agan un estudio pero con
 la jente. no estudio de mentiras. como lo an
 echo siempre, y me opongo a la expansion por eso.
 Por tantas enfermedades que aqui estamos viviendo.

NO A LA
 EXPANSION
 RAMON LMARES *Ramon Mares*

Date: Oct 18, 2013

*Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826*

Dear Mr. Lorentzen:

I am a resident of Kettleman City and I am opposed/to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

I am 67 years old and have lived in Kettleman City more than half my life, and [sic] I have fought against the biggest toxic facility in the state and possibly the country. We have a lot of environmental branches, that [sic] supposedly protect us. But where is a single [person] who will defend us everyone [sic] lights up with money they make at the cost of the health of innocent people that they convenue [sic] with a t-shirt or with a serbesa [sic]. People who aren't even from Kettleman City. That's why it doesn't matter to them if they give them more expansion at the end of the day those people will be gone tomorrow. But we residents who have a house or a lot of years –

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Ramon L. Mares [signature]
Name *Signature*

*PO Box 262
Kettleman City, CA 93239*

(559) 362-0865

october 18, 2013

529 King st PO BOX 262

Kettleman city ca 93239

Tel Cel (559) 362-0865

___ we want to keep living in peace. and not with the fear of so many poisons so I hope that for once those agency [sic] that say they take care of the environment do their job for real. [sic] and that they protect us because that's why they put them. [sic] Look at how much Kettleman City has suffered with all the cancer asthma [sic] problems of all kinds of sickness children with [sic] birth defects. dying come and [sic] do a study but with the people. not [sic] a study of lies. like you've always done. [sic] and I oppose the expansion for that, for all the sicknesses that we're living through here [sic]

NO TO THE EXPACION [sic]

RAMON L MARES [signature]

5472

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Me opongo para la expansion, ya basta
Con tanta contaminación
Estan dañando la salud de todos
las personas y niños

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Ivonne Rangel
Nombre

Ivonne Rangel
Firma

PO Box 355
Kettleman City, CA 93239

(559) 816 - 0215

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Act

KETTLEMAN COMMENTS (1-64) PG. 3

I object to the expansion, enough of so much pollution

They are harming the health of all the people and children

Ivonne Rangel [signature]

PO Box 355
Kettleman City, CA 93239
(559) 816-0215

5473

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo- Nereida Ramirez

Me opongo a la expansion del
damp por la salud de los niños

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Nereida Ramas
Nombre

Nereida Ramirez
Firma

PO Box _____
Kettleman City, CA 93239

(559) 836 61 - 49

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KETTLEMAN COMMENTS (1-64) PG. 4

I- Nereyda Ramirez object. to the [sic] expansion of the donp [sic] for the health of the children

Nereyda Ramirez [signature]

(559) 836 61-49

5474

Fecha: 10/23/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

yo Mauricio Zavala me opongo al permiso
expansion, por que tengo muchos sobrinos
chiquitos, y quiero una buena vida para ellos
y es dificil de mirar las cosas y enfermedades
que estan causando esto "Ay que parar esto"

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Mauricio Zavala
Nombre

Mauricio Zavala
Firma

PO Box 601
Kettleman City, CA 93239

(559) 362 - 8317

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GLDVIS REGIONAL OFFICE

A.M.

KETTLEMAN COMMENTS (1-64) PG. 5

Date: 10/23/13

I Mauricio Zavala object to the expansion permit, because I have a lnot [sic] of small nephews, and I want a good life for them and It's difficult to see things and sicknesses [sic] that are causing this "this should be stopped"

Mauricio Zavala [signature]

PO Box 601
Kettleman city, CA 93239
(559) 362-8317

5475

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

No Guillermini meo Pongo A
ala expansion
no me quiero morir

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Guillermini
Nombre

Guillermini
Firma

PO Box 306
Kettleman City, CA 93239

(559) 916 7196

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AM

KETTLEMAN COMMENTS (1-64) PG. 6

I Guiller [illegible] object to the espancion. [sic]
I don't want to die

Guiller [illegible] [signature]

PO Box 306
Kettleman City, CA 93239
(559) 816 7156

5476

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo Guadalupe Me opongo a que ya una
es pasion por que ya ay Muchachos Malos
de cancer y a mas no y asi ya no ya
mas sufrimiento en familias.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Guadalupe Garcia
Nombre

10-27-13
Firma

PO Box 263
Kettleman City, CA 93239

(559) 386 - 9930

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KETTLEMAN COMMENTS (1-64) PG. 7

I Guadalupe object to there being an expansion [sic] because there are already kids sick with cancer [sic] no more [sic] and that way there won't be more suffering in families.

Guadalupe Garcia [10-23-13]

PO Box 263
Kettleman City, CA 93239
(559) 386-9930

5477

Fecha: 10/24/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo Ana me opongo al proyecto de Expansión del Dumper
chem waste por que ya Existe mucha Contaminación
EN el valley de San Joaquin y muchos problemas
de Salud! No a la Expansión de Chemical
Waste Management.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Ana Martinez

Nombre

[Signature]

Firma

PO Box Bakersfield CA

Kettleman City, CA 93239

~~(559)~~

661 281-4279

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[Signature]

KETTLEMAN COMMENTS (1-64) PG. 8

10/24/13

I Ana object to the expansion of the chem waste dompe [sic] project because a lont [sic] of pollution already exists in the San Joaquin Valley and a lot of health problems!
No To The Expansion of Chemical Waste Management.

Ana Martinez [sp?]

[signature]

PO Box Bakersfield CA
Kettleman City, CA 93239
(~~559~~) 661 281-4279

5478

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

*118. Rosa digo que no #laspenion
porque no quiero mas contaminacion*

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Rosa M. Moreno
Nombre

[Signature]
Firma

PO Box 044
Kettleman City, CA 93239

(559) 386 - 4650

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[Handwritten mark]

5478

KETTLEMAN COMMENTS (1-64) PG. 9

I Rosa say no to the spacion [sic] because I don't want any more pollution

Rosa. M. Moreno [sp?] [signature]

PO Box 644
Kettleman City, CA 93239
(559) 386-4650

5479

Fecha: 10-23-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo: Barbara Pulido.

me opongo a que le den el permiso de
expansión porque me preocupa la salud de
mis hijas an pasado muchas muertes a causa
de esas tóxicas

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Barbara Pulido
Nombre

10-23-13
Firma

PO Box 601
Kettleman City, CA 93239

(559) 386-5936

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KETTLEMAN COMMENTS (1-64) PG. 10

Date: 10-23-13

I Barbara Pulido. [sic] object to giving them the enpencion [sic] permit because I worry about the health of my children there have been [sic] a lot of deaths caused by these kimicals [sic]

Barbara Pulido [10-23-13]

PO Box 601
Kettleman City, CA 93239
(559) 386-5936

5480

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

YO BERTHA ME Opongo a la EXPANsION porque afecta mi salud

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Bertha Diaz
Nombre

Bertha Diaz
Firma

PO Box 472
Kettleman City, CA 93239

(559) 386 9940

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az

5480

KETTLEMAN COMMENTS (1-64) PG. 11

I Bertha object to the expansion because it affects my health

Bertha Diaz [signature]

PO Box 472
Kettleman City, CA 93239
(559) 3869-440

5481

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Vd Abel Vega no quiere que le den la expansión al dumpen por q a se mucho daño a la salud.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Abel Vega
Nombre

Abel Vega
Firma

PO Box _____
Kettleman City, CA 93239

(559) *386-1834*

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Abel

KETTLEMAN COMMENTS (1-64) PG. 12

I Abel Vega [sp?] don't vant [sic] you to give the expansion [sic] to the dompe [sic] to
be a lot of damage to health. [sic]

Abel Vega [signature]

(559) 368-1834

5482

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

*Yo Miguel Lomachto me preocupó
por mi salud y la de la comunidad
y mi oposición a la expansión del
Chemical Waste Management.*

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Miguel Lomachto
Nombre

Miguel Lomachto
Firma

PO Box _____
Kettleman City, CA 93239

(559) *212-8478*

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Amj

KETTLEMAN COMMENTS (1-64) PG. 13

I Miguel Lomactlo [sp?] am worried for my health and of the community and I object to the expansion [sic] of CHEMICAL Waste Management. [sic]

Miguel Lomactlo [signature]

(559) 212-8478

5483

Fecha: 10-23-13.

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

yo Maria Limón me opongo a lo de la expansión me preocupa la de mi salud y lo de mi comunidad. no es posible que nos contaminen mas.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Maria Limón
Nombre

Maria Limón
Firma

PO Box 143-
Kettleman City, CA 93239

(559) 904-4318.

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aj

KETTLEMAN COMMENTS (1-64) PG. 14

Date: 10-23-13.

I Maria Limón object to that of the expansion [sic] I worry [sic] about my health. and about my community. [sic] it's not possible that they pollute us more. [sic]

Maria Limón [signature]

PO Box 143-
Kettleman City, CA 93239
(559) 904-4318

5484

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

*Yo Simona me opongo al permiso de expansión
por que me preocupa mi salud y la salud de
mi comunidad.*

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Simona Taxis
Nombre

Simona Taxis
Firma

PO Box 307
Kettleman City, CA 93239

(559) 386-0281

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[Handwritten signature]

KETTLEMAN COMMENTS (1-64) PG. 15

I Simona object to the expansion [sic] permit because I worry about my health and the health of my community.

Simona Tania [sp?] [signature]

PO Box 307
Kettleman City, CA 93239
(559) 386-0281

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo Juan Fuentes me opongo a que no les den
el permiso de Expacion a Chem Waste
por que emos tenido mucha problemas de salud
en nuestra gente.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

JUAN FUENTES
Nombre

Firma

PO Box 596
Kettleman City, CA 93239

(559) 386 - 0468

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ans

KETTLEMAN COMMENTS (1-64) PG. 16

I Juan Fuentes [sp?] object to not giving chem waste the expacion [sic] permit because we have had a lot of health problems in our people.

JUAN FUENES [sp?] [Translator's note: the writer's name was written differently in the body of the comments vs. the signature line]

PO Box 596
Kettleman City, CA 93239
(559) 386-0468

5486

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

No me llamo Isidro me opongo
a la contaminación
NO A LA EXPANSION del dope chem
WASTE.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Isidro. Espinoza 
Nombre Firma

PO Box _____
Kettleman City, CA 93239

(559) 309 - 77 26

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KETTLEMAN COMMENTS (1-64) PG. 17

Llo [sic] name is Isidro I object to pollution not to the EXPANCIO [sic] of the chem waste
dope. [sic]

Isidro . Espinoza [signature]

(559) 309-7726

5487

Fecha: 10/21/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo Oscar Mendez
Me opongo al permiso de expansion del campo.
por que al aumentar contaminacion y eso causaria
mas contaminacion en mi comunidad y ademas este
campo hoy ya quisiera que siga siempre y me preocupe.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Oscar Mendez
Nombre

[Signature]
Firma

PO Box 625
Kettleman City, CA 93239

(559) 817 - 75 65

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[Signature]

KETTLEMAN COMMENTS (1-64) PG. 18

Date: 10/21/13

I Oscar Mendec [sp?] object to the expansion permit of the dompe [sic] because there is a lot of pollution and that [illegible] more pollution in my community and [illegible] I want it to always [illegible] and it worries me.

Mendec Oscar [signature]

PO Box 695
Kettleman City, CA 93239
(559) 817-7565

5488

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo Gustavo Ayala No Estoy de acuerdo
con la Expansion.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

GUSTAVO AYALA
Nombre

Firma

PO Box 3
Kettleman City, CA 93239

(559) _____

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Am

KETTLEMAN COMMENTS (1-64) PG. 19

I Gustavo Ayala do not agree with the expansion.

GUTAVO AYALA

PO Box 3
Kettleman City, CA 93239

5489

Date: 10.21.13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

El Pueblo de Kettleman city ya tiene
muchas fuentes de contaminación
la compañía ha tenido varias
violaciones y por lo tanto no quiero
que den más permisos Chemical Waste

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

GUADALUPE ESTRADA
Print Name

Guadalupe Estrada
Signature

PO Box 501
Kettleman City, CA 93239

(559) _____

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aj

KETTLEMAN COMMENTS (1-64) PG. 20

Date: 10, 21, 13

The town of Kettleman City already has many sources of pollution
The company has had various violations and therefore I don't want you to give
Chemical Waste permits [sic]

GUADALUPE ESTRADA [sic]

[signature]

PO Box 501
Kettleman City, CA 93239

5490

Fecha: 10-17-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

YO Belinda me opongo a la
expansion de la compania Chemical Waste
management a tenido de mucha violaciones

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Belinda Parajas
Nombre

Belinda Parajas
Firma

PO Box 190
Kettleman City, CA 93239

(559) 362 - 9106

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Ang

KETTLEMAN COMMENTS (1-64) PG. 21

Date: 10-17-13

I Belinda object to the Chemical Waste Management company expansion it has had of many violations [sic]

Belinda Barajas [signature]

PO Box 190
Kettleman City, CA 93239
(559) 362-9106

5491

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo me opongo para que no le den el
Permiso para poner el dumpen por que
ay mucha asma en el pueblo yo mismo
tengo un hijo con asma

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Leticia Botello
Nombre

Leticia Botello
Firma

PO Box 502
Kettleman City, CA 93239

(559) 386 - 96 32

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Amj

KETTLEMAN COMMENTS (1-64) PG. 22

I object so that they don't give the permit to put the dompen [sic] because there is a lot of asthma in the town I myself [sic] have a son with asthma

Leticia Botello [signature]

PO Box 502
Kettleman City, CA 93239
(559) 386-9632

5492

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

YO ELOY ME OPONGO A LA EXPANSION DEL DUMPING TOXICO
CHEMICAL WASTE MANAGEMENT ME OPONGO POR LAS SIGUIENTES RAZONES
Porque me preocupa la salud de mi familia

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

ELOY DIAZ LOPEZ
Nombre

Eloy Diaz Lopez
Firma

PO Box 4472
Kettleman City, CA 93239

(559) 386 - 9440

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Amj

KETTLEMAN COMMENTS (1-64) PG. 23

I Eloy object expansion [sic] of the Chemical Waste Management toxic dump [sic] I object [sic] for the following reason because I worry about the health of my family [sic]

Eloy Diaz Lopez [signature]

PO Box 4472
Kettleman City, CA 93239
(550) 386-9440

5493

Fecha: 10-23-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

la razones esque a causado que
las personas resulten con enfermedades.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Rocio Reynosa
Nombre

Rocio Reynosa
Firma

PO Box _____
Kettleman City, CA 93239

(559) 723 - 3736

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A.M.

KETTLEMAN COMMENTS (1-64) PG. 24

Date: 10-23-13

The reasons it's because [sic] it has caused the people to result in sicknesses [sic].

Rocio Reynosa [signature]

(559) 723-3736

5494

Fecha: 10-23-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

De que esta causando muertes y enfermedades a nuestras familias.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Yanira Reynosa
Nombre

Yanira Reynosa
Firma

PO Box 702
Kettleman City, CA 93239

(559) 736-3733

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[Handwritten signature]

KETTLEMAN COMMENTS (1-64) PG. 25

Date: 10-23-13

That it's causing deaths and sicknesses to our families.

Yanira Reynosa [signature]

PO Box 702
Kettleman City, CA 93239
(559) 736-3733

5495

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo me llamo Teresa Chazala vivo en el 403 Milhame de Kettleman City y me opongo a esta ley por la salud de mis hijos y salud propia. Pido que se pare esta ley.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Teresa Chazala
Nombre

Teresa Chazala
Firma

PO Box 633
Kettleman City, CA 93239

(559) 310 - 8637

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A.J.

KETTLEMAN COMMENTS (1-64) PG. 26

My name is Teresa Cheyola [sp?] I live at 403 Milhame in Kettleman City and I object. to [sic] this law for the health of my children and my own health. I ask that you stop this law.

Teresa Cheyola [signature]

PO Box 633
Kettleman City, CA 93239
(559) 310-8637

5496

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Me gustaria que no tiraran mas basura. Por que la calidad del aire es muy mala. y para la mejor calidad de vida del pueblo de Kettleman city

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Sergio Borjas
Nombre

Sergio Borjas
Firma

PO Box 236 Millham
Kettleman City, CA 93239

(559) 386 - 0855

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[Handwritten signature]

KETTLEMAN COMMENTS (1-64) PG. 27

I would like you to not throw more trash. because [sic] the quality of the air is very bad.
and [sic] for the better quality of life of the town of Kettleman City

Sergio Borojies [sp?] [signature]

PO Box 236 Milham
Kettleman City, CA 93239
(559) 386-0855

5497

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo Rosalia me opongo al permiso de expansion de Chemical Waste Tengo muchos de salud

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Rosalia mesa
Nombre

Rosalia mesa
Firma

PO Box 74
Kettleman City, CA 93239

(559) 386-6923

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Am

KETTLEMAN COMMENTS (1-64) PG. 28

I Rosalia object to the permit for expansion of ChemicAl WaSTE [sic] I have a lot of health [sic]

Rosalia Meza [signature]

PO Box 74
Kettleman City, CA 93239
(559) 386-4923

Fecha: 10/24/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

no estoy de acuerdo a que les den el permiso
para Expandir el vertedero Chem waste.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Teresa A. Guerrero Teresa Guerrero
Nombre Firma

PO Box 518
Kettleman City, CA 93239

(559) 386-4833

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AM

KETTLEMAN COMMENTS (1-64) PG. 29

Date: 10/24/13

I do not agree with giving the permit to expand the chem waste landfill.

TeresaA . Guerrero [signature]

PO Box 518
Kettleman City, CA 93239
(559) 386-4833

5499

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo Martha Me opongo ala expansion
Por que no quiero que mis Bebes
al gun dia tengan asma o cancer

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Martha Andrade
Nombre

10-23-13
Firma

PO Box 263
Kettleman City, CA 93239

(559) 386 - 9930

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AM

KETTLEMAN COMMENTS (1-64) PG. 30

I Martha object to the expansion [sic] because I don't want my babies to someday have asthma or cancer [sic]

Martha Andrade [10-23-13]

PO Box 263
Kettleman City, CA 93239
(559) 386-9930

5500

Fecha: 10-17-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Tadavia no se sabe porque naciera
tantos niños con defectos de nacimiento
lo único que es cierto es que hubo
demasiados niños afectados en nuestra
comunidad.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Pablo Gutierrez

Nombre

Pablo Gutierrez

Firma

PO Box 664
Kettleman City, CA 93239

(559) 836-6570

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ms

KETTLEMAN COMMENTS (1-64) PG. 31

Date: 10-17-13

It still isn't known why so many children born with birth defects [sic]
the only thing that is certain is that many children were affected in our community.

Pablo . Gutierrez [signature]

PO Box 66a
Kettleman City, CA 93239
(559) 836-6570

5501

Fecha: 10-16-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

el condado uso un proceso rezista. Para las
audiencias que hicieron durante el proceso
de la expansion

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Blanca Cordova Blanca Cordova
Nombre Firma

PO Box 395
Kettleman City, CA 93239

(559) 386 - 4574

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Date: 10-16-13

the [sic] county used a racist process. For [sic] the hearings they held during the expansion process

Blanca . Cordova

[signature]

PO Box 395
Kettleman City, CA 93239
(559) 386-4574

5502

Fecha: 10-17-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Como es posible q digan q no hay

habiendo mas gente con cancer
com tantos niños q an fallecido
por cancer como Daniel Celedon
q tuvo el cancer mas agresivo

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Por Favor
Hebran
los ojos

Sinceramente,

MARTHA CLAVER

Nombre

Firma

PO Box 355
Kettleman City, CA 93239

(559) 386-1077

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MS

5502

KETTLEMAN COMMENTS (1-64) PG. 33

Date: 10-17-13

How is it possible t[hat] they say t[here] aren't having [sic] more people with cancer with so many children t[hat] have died of cancer like Daniel Celedon [sp?] w[ho] had the most aggressive cancer

Please open your eyes

MARTHA CHavez

PO Box 355
Kettleman City, CA 93239
(559) 386-1077

5503

Fecha: 10-17-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Toda via no se sabe porque nacieron
tantos niños con defectos de nacimiento
lo unico que es cierto es que vivo demorados
niños afectados en nuestra comunidad

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Naria Cervantes
Nombre

10-17-13
Firma Naria Cervantes

PO Box 243
Kettleman City, CA 93239

(559) 469-1490

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5503

KETTLEMAN COMMENTS (1-64) PG. 34

Date: 10-17-13

It still isn't known why so many children were born with birth defects
the [sic] only thing that is certain is that there were many children affected in our
community

Maria Cervantes

[10-17-13]

[signature]

PO Box 243

Kettleman City, CA 93239

(559) 469-1490

5504

Fecha: 10-17-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

EL PUEBLO DE KETTLEMAN CITY YA TIENE
MUCHAS FUENTES DE CONTAMINACION

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Royes Sandoval
Nombre

Royes Sandoval
Firma

PO Box 18
Kettleman City, CA 93239

(559) 816 - 9517

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ms

5504

KETTLEMAN COMMENTS (1-64) PG. 35

Date: 10-17-13

THE TOWN OF KETTLEMAN CITY ALREADY HAS [sic] MANY SOURCES OF POLLUTION

Reyes Sandoval [signature]

PO Box 18
Kettleman City, CA 93239
(559) 816-9517

5505

Fecha: 10-17-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

La compañía a tenia varias violaciones.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Mois Mostey
Nombre

Mois Mostey
Firma

PO Box 485
Kettleman City, CA 93239

(559) 386 2985

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MS

5505

KETTLEMAN COMMENTS (1-64) PG. 36

Date: 10-17-13

The company has had various[s] violations.

Mario Mostiy [sp?] [signature]

PO Box 485
Kettleman City, CA 93239
(559) 386-2985

5506

Date: 10-16-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

En la Junta con el condado de Kings a la gente que hablaba Español solo se le dio 2 1/2 minutos para hablar pero a la gente que hablaba Ingles se les dio 5 minutos

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Gabriela Rodriguez
Print Name

Gabriela Rodriguez
Signature

PO Box 585
Kettleman City, CA 93239

(559) 707-3167

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5506

KETTLEMAN COMMENTS (1-64) PG. 37

Date: 10-16-13

In the meeting with Kings County only 2 and a half minutes were given for the people who spoke Spanish but 5 minutes were given for the people who spoke English [sic]

Gabriela Rodriguez [signature]

PO Box 585
Kettleman City, CA 93239
(559) 707-3167

5507

Fecha: 10-16-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

UVO muchas niños enfermos
algunos murieron

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Robert Rodriguez Robert Rodriguez
Nombre Firma

PO Box _____
Kettleman City, CA 93239

(559) 981 - 6467

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5507

KETTLEMAN COMMENTS (1-64) PG. 38

Date: 10-16-13

There were a lot of sick children some died [sic]

Roberto Rodriguez [signature]

(559) 981-6467

5508

Fecha: 10-16-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:


Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

El Estado de California hizo la
recomendación que se disminuyera
la contaminación en Kettleman City.
Si se aprueba el permiso para la
Expansión, habrá más contaminación.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,


Nombre


Firma

PO Box 585
Kettleman City, CA 93239

(559) 981-6467

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5508

KETTLEMAN COMMENTS (1-64) PG. 39

Date: 10-16-13

The State of California made the recomendasion [sic] that pollution should be reduced in Kettleman City. If the permit for expansion is approved, there will be more pollution.

Maria E Rodriguez [signature]

PO Box 585
Kettleman City, CA 93239
(559) 981-6467

5509

Fecha: 10-16-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

La Compañia a tenido varias vibraciones
todavia no se sabe porque nacieron tantos niños con
defectos de nacimiento

el pueblo de Kettleman City ya tiene muchas fuentes
de contaminación

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Claudia Rodriguez
Nombre

Claudia Rodriguez
Firma

PO Box 361
Kettleman City, CA 93239

(559) 326-9 - 92-11

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5509

KETTLEMAN COMMENTS (1-64) PG. 40

Date: 10-16-13

The company has had various violations

It still isn't known why so many children were born with birth defects

the [sic] town of Kettleman City already has many sources of pollution

Claudia Rodriguez

[signature]

PO Box 361

Kettleman City, CA 93239

(559) 386-72-11

5510

Fecha: 10-24-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Yo maria Rangel me opongo ala expan-
cion porque tengo una hermana que
tuvo Cancer y una Nieta que fallecio
por defectos de Nacimiento y me
pregunto yo que pasa si es que
nadie esta contaminando

Porque?
Porque?
Porque?

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Maria Rangel
Nombre

Maria Rangel.
Firma

PO Box 585
Kettleman City, CA 93239

(559) 386 - 0200 9802

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KETTLEMAN COMMENTS (1-64) PG. 41

Date: 10-24-13

I Maria Rangel object to the expansion because I have a sister who had Cancer and a niece who died of Birth defects and I ask myself why that is if nobody is polluting

Why?

Why?

Why?

Maria Rangel [signature]

PO Box 585
Kettleman City, CA 93239
(559) 386-9802

5511

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

El pueblo de Kettleman city ya tiene muchas fuentes de contaminación

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Miguel Alatorre
Nombre

Miguel Alatorre
Firma

PO Box 262
Kettleman City, CA 93239

(559) _____

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Alatorre

5511

KETTLEMAN COMMENTS (1-64) PG. 42

The town of Kettleman City already has many sources of pollution.

Miguel Alatorre [signature]

PO Box 262
Kettleman City, CA 93239
(559) ---- - -----

5512

Fecha: 10-24-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

El pueblo de K.C. ya tiene muchas fuentes
de contaminación por favor les ruego
no les den el permiso por la salud de
los niños y Ancianos. no mas
CANCER
CANCER

Por favor nieguen el permiso para la expansión de este vertedero toxico.
CANCER

Sinceramente,

Trinidad Picazo
Nombre

Trinidad Picazo
Firma

PO Box 583
Kettleman City, CA 93239

(559) 386 - 9960

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5512

KETTLEMAN COMMENTS (1-64) PG. 43

Date: 10-24-13

The town of K.C. already has many sources of pollution please I beg you [sic] don't give them the permit for the health of the children and Elderly no more

CANCER

CANCER

CANCER

Trinidad Picaro [sp?]

[signature]

PO Box 583

Kettleman City, CA 93239

(559) 386-9960

5513

Fecha: 10-24-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

~~Recordando~~ El estado de California hizo la recomendación que se disminuyera la contaminación en KC. Si se aprueba el permiso para expansión, abra mas contaminación

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Guadalupe Ruiz
Nombre

Guadalupe Ruiz
Firma

PO Box 61
Kettleman City, CA 93239

(559) 386 - 94 34

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5513

KETTLEMAN COMMENTS (1-64) PG. 44

Date: 10-24-13

The state of California made the recommendation to reduce the pollution in K.C. If the permit is approved for the expansion, there will be more pollution.

Guadalupe Nieto [sp?] [signature]

PO Box 61
Kettleman City, CA 93239
(559) 386-9434

5514

Fecha: 10-24-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

La expansión afectara la calidad
de nuestro aire.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Jazmin Cadena
Nombre


Firma

PO Box 604
Kettleman City, CA 93239

(559) 386 - 1446

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5514

KETTLEMAN COMMENTS (1-64) PG. 45

Date: 10-24-13

The expansion will affect the quality of our ahir. [sic]

Jazmin Cadena [signature]

PO Box 604
Kettleman City, CA 93239
(559) 386-1446

5515

Fecha: 10-24-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Todavía no se sabe porque nacieron tantos niños con
defectos de nacimiento. Lo unico que es cierto es que hubo
demasiados niños afectados en nuestra comunidad.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Rafael Rodriguez
Nombre

Firma

PO Box 93239
Kettleman City, CA 93239

(559) 309 -12-53

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ms

KETTLEMAN COMMENTS (1-64) PG. 46

Date: 10-24-13

It still isn't known why so many children were born with birth defects. The only thing that is certain is that there were many children affected in our community.

Rafael Rodriguez

PO Box 93239
Kettleman City, CA 93239
(559) 309-12-53

5516

Fecha: 10-23-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Me opongo a la expansion porque tuve una niña con defectos de nacimiento y perdi un bebe de solo 3 meses de nacido tengo dos hijas con Asma y una bebe que ah ido 2 veces al hospital de emergencia por no poder respirar esuchen

Por favor nieguen el permiso para la expansión de este vertedero toxico.

x favor algo no esta bien

Sinceramente,

Maria Saucedo
Nombre

Maria Saucedo
Firma

PO Box 585
Kettleman City, CA 93239

(559) 977 - 0499

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ms

5516

KETTLEMAN COMMENTS (1-64) PG. 47

Date: 10-23-13

I object to the expansion because I had a daughter with birth defects and I lost a baby of only 3 months from birth I have [sic] two daughters with Asthma and one baby who has gone 2 times to the emergency hospital for not being able to breath listen [sic] and fabor [sic] something is not right.

Maria Saucedo [signature]

PO Box 585
Kettleman City, CA 93239
(559) 977-0499

5517

Fecha: 10-24-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

mi nombres es Viridiana Franco y en el 2008
tuve una hija con defectos de nacimiento
tengo 2 hijos con Asma y les pido alas
autoridades su apoyo para que no expandan
x favor no queremos mas contaminacion

"Gracias"

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Viridiana Franco
Nombre

Viridiana Franco.
Firma

PO Box 664
Kettleman City, CA 93239

(559) 679 - 5933

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M.S

5517

KETTLEMAN COMMENTS (1-64) PG. 48

Date: 10-24-13

My name is Viridiana Franco and in 2008 I had a daughter with birth defects
I have 2 children with Asthma and I ask the authorities for your support to not expand
[sic] x fabor [sp?] we don't want more pollution

"Thank you'!

Viridiana Franco

[signature]

PO Box 664

Kettleman City, CA 93239

(559) 679-5933

5518

Fecha: 10-22-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Me opongo porque al expandir el lugar de los desechos quimicos tambien se expande la contaminación y sigue avanzando el cancer y enfermedades en nuestro pueblo gracias.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Guadalupe Cháidez
Nombre

Gpa Chandez
Firma

PO Box _____
Kettleman City, CA 93239

(559) 904 - 5719

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5518

KETTLEMAN COMMENTS (1-64) PG. 49

Date: 10-22-13

I object because upon expanding the place for chemical waste the [sic] pollution will also expand and will keep advancing cancer and sicknesses in our town thank you [sic].

Guadalupe Chaidez [signature]

(559) 904-5719

5519

Fecha: 10-22-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Pido que no den el permiso para
que no amplien el dompe de basura
toxica. an abido muchas Violaciones
en esa Compania. escuchan nuestra Voz.
no queremos mas Cáncer i niños enfermos.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Oracio Santillán
Nombre

Horacio Santillán
Firma

PO Box 187
Kettleman City, CA 93239

(559) 381 - 8502

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MS

KETTLEMAN COMMENTS (1-64) PG. 50

Date: 10-22-13.

I ask that you not give them the permit so. -- [sic]
that they not expand the toxic. trash dompe. -- [sic]
there have been many Violations in that company. hear our Voice. [sic]
we don't want more cancer i[sic] sick children.

Oracio Santillan. [signature]

PO Box 187
Kettleman City, CA 93239
(559) 381-8502

5520

Fecha: 10-21-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Pido Oidos para nuestras Voces.
No Queremos mas Cancer i mas
niños con mal Formaciones. no
Queremos que expandan el damped
de basura toxica. escuchenos "Pleuqi"

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Maria Novano
Nombre

Maria Novano
Firma

PO Box 651
Kettleman City, CA 93239

(559) 772 - 7220

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ms

5520

KETTLEMAN COMMENTS (1-64) PG. 51

Date: 10-21-13.

I ask for ears to hear our "Voices".

we don't want more cancer i [sic] more children with mal Formations. [sic] we don't Want them to expand the dompe. [sp?] of toxic trash. hear us "*Please*".

Maria Norono [sp?]

[signature]

PO Box 651

Kettleman City, CA 93239

(559) 772-7220.

5521

Fecha: 10-22-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

NO MAS DESUDA TOXICA

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Guillermo Velazquez
Nombre

[Signature]
Firma

PO Box _____
Kettleman City, CA 93239

(559) 28191-24

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KETTLEMAN COMMENTS (1-64) PG. 52

Date: 10-22-13

No more toxic waste

Gregorio Vela [illegible] [signature]

(559) 38191-24

5522

Fecha: 10-21-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

No sabemos porque nacieron tantos niños
con defecta de nacimiento y siguen
naciendo.

El pueblo de K.C. ya tiene muchas
fuentes de contaminación

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Jesus Lopez R
Nombre

10^o
Firma Jesus Lopez R

PO Box 484
Kettleman City, CA 93239

(559) 381-5425

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MS

5522

KETTLEMAN COMMENTS (1-64) PG. 53

Date: 10-21-13

We don't know why so many children were born with birth defects and keep being born [sic]

The town of K.C. already has many sources of pollution

Jesus Goris R [sp?]

[signature]

PO Box 484

Kettleman City, CA 93239

(559) 381-5425

5523

Fecha: 10/21/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

El Dueblo de Kc ya tiene muchas
fuentes de contaminación

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Herminia Ayala
Nombre

Herminia Ayala
Firma

PO Box 268
Kettleman City, CA 93239

(559) _____ - _____

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KETTLEMAN COMMENTS (1-64) PG. 54

Date: 10/21/13

The town of KC already has many sources of pollution

Herminia Ayale [sp?] [signature]

PO Box 268
Kettleman City, CA 93239

5524

Fecha: 10/21/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

La compañía ha tenido varias violaciones

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Yamin Naran
Nombre

Yamin Naran
Firma

PO Box 651
Kettleman City, CA 93239

(559) 386-1461

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5524

KETTLEMAN COMMENTS (1-64) PG. 55

Date: 10/21/13

The company has had various violations

Yazmin Navaro [sp?] [signature]

PO Box 651
Kettleman City, CA 93239
(559) 386-1461

5525

Fecha: 10-21-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

El condado uso un proceso racista
para la audiencia que se hicieron durante
el proceso de expansion
La compania ha tenido varias violaciones.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Gilberto Vega
Nombre

Gilberto Vega
Firma

PO Box 273
Kettleman City, CA 93239

(559) 772 - 7902

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5525

KETTLEMAN COMMENTS (1-64) PG. 56

Date: 10-21-13

The county used a racist process for the hearing that was held during the expansion process [sic]

The company has had various violations.

Gilberto Vega [signature]

PO Box 273

Kettleman City, CA 93239

(559) 772-7902

5526

Fecha: 10-21-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

El pueblo de KC. ya tiene muchas
fontes de contaminación

La compañía ha tenido varias violaciones

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

JOSÉ FLORES
Nombre

José Flores
Firma

PO Box 572
Kettleman City, CA 93239

(559) 386 - 1322

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5526

KETTLEMAN COMMENTS (1-64) PG. 57

Date: 10-21-13

The town of K.C. already has many sources of pollution
The company [sic] has had various violations.

Jose Flores [signature]

PO Box 572
Kettleman City, CA 93239
(559) 386-1322

5527

Fecha: 10-21-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

El pueblo de Kettleman City ya tiene
suficientes fuentes de contaminación
El condado uso un proceso racista para
las audiencias que se hicieron sobre el
proceso de expansión

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Ma Elena Guardado
Nombre

Ma Elena Guardado R
Firma

PO Box 572
Kettleman City, CA 93239

(559) 386-1322

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ms

5527

KETTLEMAN COMMENTS (1-64) PG. 58

Date: 10-21-13

The town of Kettleman City already has plenty sources of pollution
The county used a racist process for the hearings that were held regarding the
expansion process [sic]

Ma Elena Guardado [signature]

PO Box 572
Kettleman City, CA 93239
(559) 386-1322

5528

Fecha: 10 - 21 - 13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

La expansion afecta la calidad del
Aire

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Pedro Vasquez
Nombre

Pedro Vasquez
Firma

PO Box _____
Kettleman City, CA 93239

(559) 309 - 6180

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5528

KETTLEMAN COMMENTS (1-64) PG. 59

Date: 10-21-13

The expansion affects the quality of air

Pedro Vaspe [sp?] [signature]

(559) 309-6180

5529

Fecha: 10/21/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

la calidad afectara de nuestro aire.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Susana Rangel
Nombre

Susana Rangel
Firma

PO Box 355
Kettleman City, CA 93239

(559) 386 - 1071

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ms

5529

KETTLEMAN COMMENTS (1-64) PG. 60

Date: 10/21/13

the quality will affect of our air [sic].

Susana Rangel [signature]

PO Box 355
Kettleman City, CA 93239
(559) 386-1077

5530

Fecha: 10-22-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Primergamente Pido por Favor. Ayuda i "Atención"
a nuestra voz. ya no queremos más niños
con mal Formaciones. mas Cáncer. por Favor.
Ayúdenos para que no. Amplien el dompo
de basura toxica. escuchen nuestra "Voz".

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Ruby Pelayo
Nombre

Ruby Pelayo
Firma

PO Box 706
Kettleman City, CA 93239

(559) 530-1519

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KETTLEMAN COMMENTS (1-64) PG. 61

Date: 10-22-13

First of all I ask please. [sic] Help I, [sic] "Attention" to our voice. We don't want any more children with mal Formations. [sic] more cancer. [sic] please. [sic] Help us so that they won't enlarge the toxic waste dompe. [sic] hear our "voice". [sic]

Ruby Pelayo [signature]

PO Box 706
Kettleman City, CA 93239
(559) 530-1519

5531

Fecha: 10-24-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Por que las Enfermedades se expanden mas rapido y nadie tiene una Solucion
La Comunidad es primero La niñas es el futuro y en este Pueblo no hay mucho

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Alejandro Alvarez R
Nombre

A.A.R.
Firma

PO Box _____
Kettleman City, CA 93239

(559) 698 - 4965

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KETTLEMAN COMMENTS (1-64) PG. 62

Date: 10-24-13

Because the Sicknesses expand faster and nobody has a Solution [sic]
The Community is first The [sic] children is the future [sic] and in this Town there isn't
much [sic]

Alejandro Alvarez R [signature]

(559) 698-4965

5532

Fecha: 10/17/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Erica Romero
yo me yamo me oponjo el permiso
de Espacion de chemical waste Managemant
Porque ay muchas Enfermedades como
Asma y cancer y alergias

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Erica Romero
Nombre

Erica Romero
Firma

PO Box 111
Kettleman City, CA 93239

(559) 386 - 2957

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A.J.

KETTLEMAN COMMENTS (1-64) PG. 63

Date: 10/17/13

My name is Erica Romero I object [sic] the espacion [sic] permit of Chemical Waste Management [sic] because there are many sicknesses like Asthma and canser [sic] and allergies.

Erica Romero [signature]

PO Box 111
Kettleman City, CA 93239
(559) 386-2957

5533

Fecha: 10-24-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

El pueblo de Kettleman city ya tiene muchas fuentes
de contaminación

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Nubra tones
Nombre


Firma

PO Box 93239
Kettleman City, CA 93239

(559) 309 12-53

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KETTLEMAN COMMENTS (1-64) PG. 64

Date: 10-24-13

The town of Kettleman City already has many sources of pollution

Nubia Torres [sp?]

[signature]

PO Box 93239
Kettleman City, CA 93239
(559) 309-12-53

5534

Fecha: 10/22/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

I Karen oppose expansion Permit for
chemical waste Maneyement
Because i don't wanna see more
pollution added in my community!

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Karen Polido
Nombre

[Signature]
Firma

PO Box 731
Kettleman City, CA 93239
(559) 639 - 3691

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[Signature]

Fecha: _____

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

I got my kids and I'm opposing because their
health is a major concern for me.

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Alejandra Aispuro
Nombre

Alejandra Aispuro
Firma

PO Box 587
Kettleman City, CA 93239

(559) 572-6003

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2013 OCT 25 PM 3:16
CLOVIS REGIONAL OFFICE

Amg

5536

Date: 10-16-2013

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

The town of Kettleman City already suffers from multiple sources of pollution.

The state of California made the recommendation to reduce pollution in Kettleman City. If the expansion permit is approved, this will increase pollution.

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Cynthia Rodriguez
Print Name

[Signature]
Signature

PO Box 361
Kettleman City, CA 93239

(559) 369 - 0999

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SUBSTANCES CONTROL
2013 OCT 25 PM 3:18
CLOVIS REGIONAL OFFICE

5537

Date: 10/22/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

The state made recommendation to
reduce pollution in Kettleman City
and they are not following there word
because if the expansion permit is approved
this will increase pollution.

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Juan Moreno
Print Name

[Signature]
Signature

PO Box _____
Kettleman City, CA 93239

(559) 386-9060

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SUBSTANCES CONTROL
2013 OCT 25 PM 3:17
CLOVIS REGIONAL OFFICE

[Handwritten mark]

5539

Date: 10-22-13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

The expansion would have a negative impact on our air quality pollution

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Jose Carrillo

Print Name

Jose Carrillo

Signature

PO Box 536
Kettleman City, CA 93239

(559) 380-8049

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SUBSTANCES CONTROL
2013 OCT 25 PM 3:18
CLOVIS REGIONAL OFFICE

ms

5540

Fecha: 10/24/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

the town of KC already suffers from
multiple sources of pollution

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Sally Ann Salinas
Nombre

Sally Ann Salinas
Firma

PO Box 214
Kettleman City, CA 93239

(559) 415 - 0698

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2013 OCT 25 PM 3:19
CLOVIS REGIONAL OFFICE

ms

5541

Date: 10.21.13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

The expansion would have a
negative impact on our air quality,
And am also concerned about my
child's health do to the air in Kettleman

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Rayna Sandoval
Print Name

Rayna Sandoval
Signature

PO Box 453
Kettleman City, CA 93239

(559) 866 - 6460

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2013 OCT 25 PM 3:18
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ms

5442

Date: 10.21.13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

Because i am concerned when i go out
it always seem that i can't Breatn or i
laugh Rapidely, ~~and~~ ive had asma since i
was small and was concerned that the air might
Be the cause of my asma.

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Julian Sandoval
Print Name

Julian Sandoval
Signature

PO Box 433
Kettleman City, CA 93239

(559) 816 - 6460

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5543

Date: 10/20/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

I veronica Corona apposed the following because
there's to much pollution already in our community
and because there's been to many sick babies
this are my reasons.

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Veronica Corona
Print Name

Veronica Corona
Signature

PO Box 586
Kettleman City, CA 93239

(559) 386 - 6323

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Handwritten initials

Fecha: 10/21/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Estimado Señor Lorentzen:

Yo soy residente de Kettleman City y estoy opuesto/a la expansión del vertedero toxico de Chemical Waste Management. Me opongo por las siguientes razones:

Por favor nieguen el permiso para la expansión de este vertedero toxico.

Sinceramente,

Nombre

Firma

PO Box _____
Kettleman City, CA 93239

(559) _____ - _____

5544

Date: 10/22/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

I oppose to the expansion of chemical waste
because it is un fair to the community to have been
split up in two in sted of being one whole
happy community. Also we still have no ided why
were born with birth defects,

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Theresa Moreno
Print Name

Theresa Moreno
Signature

PO Box 172
Kettleman City, CA 93239

(559) 386 - 9060

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[Handwritten signature in green ink]

5545

Date: 10-21-2013

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

I am opposed because we haven't had no answers
of the illnesses and birth defects going on in
Kettleman city. I am also opposed because they say it
will bring jobs to Kettleman city residents but they always
hire outsiders. ~~but~~ they also say the revenue will go to
Kettleman city, but it never does.

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Stacy Alaton
Print Name

Stacy Alaton
Signature

PO Box 76
Kettleman City, CA 93239

(559) 386-5885

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2013 OCT 25 PM 3:17
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WMA

5546

Date: Oct 18, 2013

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

I have lived in Kettleman City for more than
30 yrs, and to date my Government Agencies
cannot tell us why our babies are dying,
Why is there so much cancer, Asthma, Anemia,
and general. How can DTSC, EPA, Our
Health Departments profess as to that
Please deny the permit for the expansion of this toxic landfill. over

Sincerely,

Marylou Mares
Print Name

Marylou Mares
Signature

PO Box 262
Kettleman City, CA 93239

(559) 212-5446

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AMA

all this Toxic dumping on our town is safe, can you guarantee that we are safe?

As to the meeting in K.C. on Sept. 18, ask all the people that were there how long have they lived in Kettleman and you will find out these people are migrant and have been here for a short time. But for us, that own homes that lived here all our lives and have fought all this injustice. We will not go away. We came here to raise families to live our golden years in our homes until you can guarantee we are safe.
I am against the expansion!!

Margaret Mares

5547

Date: 10/24/13

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

I believe Chem Waste doesn't deserve this permit because they do nothing for the community. They constantly break the law and are never properly punished. This is a racist company and should be shut down.

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Miguel Alatorre Jr
Print Name

[Signature]
Signature

PO Box 262
Kettleman City, CA 93239

(559) 516 - 3021

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2013 OCT 25 PM 3:17
GLOVIS REGIONAL OFFICE

[Handwritten mark]

5548

Date: 10/21/2013

Wayne Lorentzen
DTSC
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Lorentzen:

I am a Kettleman City resident and I am opposed to the expansion of the Chemical Waste Management toxic landfill. I am opposed for the following reasons:

The company has had numerous violations
at this facility

The expansion would have negative impact
on the air

We still don't know why so many birth defects,
but there are too many birth defects in
Kettleman City

Please deny the permit for the expansion of this toxic landfill.

Sincerely,

Nancy Corona

Print Name

Nancy Corona

Signature

PO Box 74

Kettleman City, CA 93239

(559) 300 - 5885

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Tom

5549

October 25, 2013

Mr. Wayne Lorentzen
Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826
Wayne.Lorentzen@dtsc.ca.gov

COMMENTS ON DRAFT RESOURCE CONSERVATION AND RECOVERY ACT (RCRA), CLASS 3 PERMIT MODIFICATION FOR THE CHEMICAL WASTE MANAGEMENT INC., KETTLEMAN HILLS LANDFILL FACILITY RCRA-EQUIVALENT PERMIT, KETTLEMAN CITY, KINGS COUNTY, CALIFORNIA [EPA ID NO. CAT000646117]

Dear Mr. Lorentzen:

In the interests of disclosure, since the Department of Toxic Substances Control's (DTSC) Office of Legal Counsel (OLC) has indicated to me that it does not wholly subscribe to allowing me unabridged First Amendment rights, I hereby disclose that I work in the Brownfields and Environmental Restoration Program (BERP) at Chatsworth. However, this letter to you is written as a member of the concerned public not as a State of California employee.

Please note that I do not necessarily oppose Chemical Waste Management, Inc's, Kettleman Hills Facility (KHF) as a commercial hazardous waste treatment, storage and disposal facility operating under a Hazardous Waste Facility Permit (HWFP) from DTSC. I do find that some of the public notice, regulatory and environmental elements associated with the proposed draft Class 3 permit modification (C3PM---with due deference to George Lucas) are troublesome. Some of my concerns are with regard to deceptive notification elements, insufficient C3PM conditions, and poorly matched "piggy-backed" environmental evaluation regarding DTSC proposed approval of changes to the current design of "landfill B-18", effectively expanding its existing land footprint from 53 to 67 acres and increasing its total capacity by 5 million cubic yards. As it is now accepts virtually all solid, semi-solid, and liquid hazardous and extremely hazardous wastes and conducts solar evaporation in surface impoundments; disposal into hazardous waste landfills; PCB draining and flushing; PCB disposal and storage; and stabilization, solidification and storage of bulk and drummed wastes. My immediate comments are as follows:

"FACT SHEET"

Blurb

1

2

- DTSC issued an updated fact sheet on the proposed approval of the draft permit modification. It appears to include a large "cut-and-paste" from the C3PM---or perhaps it is mislabeled as a Fact Sheet. It stated that this was done because of the "...widespread public interest..." At the same time, it listed the wastes accepted by the KHF by their U.S.EPA and California-only hazardous waste codes. These are just Hazardous Waste Types--- **HOW USEFUL TO THE AVERAGE INTERESTED PARTY.** It would appear that DTSC is simply afraid to tell the public the chemical names of the wastes that the KHF extension will be authorized to manage. Despite all of the agency's blather about enhanced public participation and environmental justice it seems to be deliberately obfuscating the specifics of the wastes involved. Please don't bother replying that we can look these codes up in the California Code of regulations and elsewhere---I know that. This question and comment is directed at getting DTSC to tell the average person who picks this fact sheet what chemicals are involved---period. Re-write the blasted 12-page fact sheet to be transparent and informative and then re-notice the whole shebang---including the actual draft permit modification.

2

DRAFT CONDITIONS

"DTSC has added draft permit conditions for the Hazardous Waste Facility Permit in accordance with Cal. Code of Regs., title 22, section 66270.41. A summary of the basis for the additional permit conditions follows:" Comments on these summarized draft conditions cited are as follows:

3

- P.5, ¶2, #1 --DTSC might want to consider explaining to the interested reader what Title 22 CCR §66270.41 means---such as why can DTSC add conditions in accordance with it; what specific conditions can be added, etc.
- P.5, ¶2, #1 - **C3PM Part III, Condition 3.** "The following documents were prepared to comply with the requirements of Public Resources Code section 21000 et seq. and the CEQA Guidelines, section 15070 et seq. of title 14, of the Cal. Code of Regs. and are incorporated by reference:" Incorporated into what?
- P.5, ¶4, #1 - **C3PM Part III, Condition 3** --- DTSC chooses to add no further mitigating measures to those in the Final Supplemental Environmental Impact Report (FSEIR) prepared by CH2MHILL for the Kings County Community Development Agency ("County") dated September 2009. SJVUAPCD. Does DTSC also have responsibility for overseeing any Mitigation Monitoring and Reporting Plan (MMRP)?
- P.6, ¶1, #1- I am pleased to see that DTSC actually cites CCR, 22, §66270.32 as the basis for Part III, Condition 3, that requires under state authority that KHF comply with the King's County MMRP. It should be noted that these section of CCR allows DTSC to go further and environmental conditions of its own directly to the Permit Modification that enhance those prepared by the County. The public should be made aware in this fact sheet of the details of this section and that DTSC can go much further than it chose to.
- P.6, ¶3, #2 - **C3PM Part III, Condition 4(A)(1)(d)** ---I am also pleased to see that DTSC actually cites CCR, 22, §66264.706(b) under Part III, Condition 4(A)(1)(d) of the draft Class 3 Permit Modification, as the basis for requiring under state authority that KHF to provide for representative sampling of PCBs in the ambient air---after decades of shirking implementation of its statutory and regulatory authorities with regard to air monitoring at its RCRA facilities. However, the public should be made aware in this fact sheet of the details of this section and that DTSC can go much further than it chose to.

4

5

6

DTSC states in the KHF "Basic Information" on its Envirositor website that Under "DTSC's HWFP, CWM is required to conduct a Groundwater Monitoring Program and Ambient Air Monitoring Program. The development of a Health Risk Assessment was required in the HWFP for the Ambient Air Monitoring Program." There does appear to be a disconnect between using an HRA that does not address all of the constituents-of-concern (COCs) as defined in Title 22 CCR. Simply unwind the RCRA waste codes that DTSC proposes to approve for disposal over the next 30+ years at KFH, to a comprehensive list of chemicals to be permitted and compare that list to those chemicals that were included in the HRA. DTSC

7

has not met its regulatory obligations.

- P.6, ¶5, #3 – **C3PM Part III, Condition 4(A)(1)(e)** - I am again pleased to see that DTSC actually is requiring an additional ambient air monitoring point in Part III, Condition 4(A)(1)(e) of the draft Class 3 Permit Modification, as the basis for requiring under state authority. However, I fail to see in the Fact Sheet any mention of an air monitoring and response plan under Title 22 CCR §66264.706(b). It will be pointed out in later comments that ambient air monitoring alone is an inadequate monitoring response with respect to emissions from KHF. Specifically, deposition and accumulation of airborne emissions is a major pathway to public exposure that DTSC is aware of but neglects, even at its most dangerous emitting sites such the Exide or Quemetco secondary lead smelters in Los Angeles. KHF needs to be required to provide a program of deposition monitoring in outside the facility boundaries. Please note that deposition and accumulation of airborne lead emissions has been found 360⁰ around the above-cited lead smelters so that even the proposed ambient air monitoring may not produce adequate representation.
- P. 6, ¶6, #4 - **C3PM Part III, Condition 4(C)** - Restricting the public information to just “ambient air” is insufficient. The meeting in this condition must also address airborne emission and deposition/accumulation from KHF.
- P.7, ¶2, #5 - **C3PM Part III, Condition 4(D)** - Please explain how the proposed containment system will isolate releases of hazardous waste constituents to the air. Please explain what construction standards will be applied to prevent releases to soil and ground water.
- P.7, ¶3, #6 – **C3PM Part IV, Landfill Units B-18 and B-19, Condition 8** - The leachate sampling and analysis of the B-18 expansion seems inadequate unless it is being analyzed more frequently at a separately leachate treatment facility. Title 22 CCR §66264.13(a)(4) is cited but is it adequately addressed?
- P.7, ¶6, #7 – **C3PM Part IV, Landfill Units B-18 and B-19, Condition 9** – Why an aerial survey? This would not necessary provide the height to .01 feet. CCR, 22, §66264.309 is cited. Why is an “airspace” consumption figure on a monthly basis but leachate monitoring only quarterly/annually?
- P.7-8, ¶7 and ¶1 and 2, #8 – **C3PM Part V, Condition 4(D)** – Excellent addition but too narrow use overall of Title 22 CCR §66270.32(b)(2).
- P.8-9, ¶3 to ¶9 and ¶1 to ¶3, #9 - **C3PM Part V, Condition 5(D)** – This is of special interest. The response is inadequate. Air is major pathway of concern to the Kettleman City community. DTSC needs to require as part of (D) an enhanced ambient and deposition monitoring cycle relative to whatever and wherever the spill occurs. Such monitoring could be scaled to the composition, size and temporal extent of the spill.

It is also noted that “For the purpose of Section V.5.(D), the term “constituent” means: (a) a constituent identified in Appendix VIII to chapter 11 of division 4.5 of title 22 of California Code of Regulations which is a component of a hazardous waste or leachate and which has a physical or chemical property that causes the waste or leachate to be identified as a hazardous waste; or (b) any other element, chemical compound, or mixture of compounds which is a component of a hazardous waste or leachate and which has a physical or chemical property that causes the waste or leachate to be identified as a hazardous waste.”

DRAFT REPORT ANNUAL SCREENING LEVEL HEALTH RISK ASSESSMENT OCTOBER 2011 – SEPTEMBER 2012

- “Since late 2006, AAMP air measurements have been regularly collected at three sampling

stations...” located around the KHF boundary. KHF “...completed a detailed, four-year evaluation of comprehensive ambient air quality measurements collected at those three sampling stations during October 2006 through September 2010, and performed an HRA based on those measurements to evaluate potential risks to human health in the area...” of the KHF facility.

15

Was a dry deposition module run? What were the predictions?

- “A Screening Level HRA (2012 Screening Level HRA) presenting a human health risk evaluation of the next year of AAMP ambient air data (October 2010 through September 2011) was submitted in April 2012 (Wenck, April 2012) and approved by DTSC in July 2012. This 2013 Screening Level HRA covers the time period October 2011 through September 2012. Both Screening Level HRAs rely on the same approved and conservative risk assessment methodology as the 2011 Final HRA. For example, the 2012 and 2013 Screening Level HRAs use the same methods for air data evaluation and selection of chemicals of potential concern (COPCs), as well as the same procedures for development of exposure point concentrations that reflect long-term COPC concentrations in ambient air downwind from the facility (at the immediate property boundary and at nearby residential locations) due to potential KHF emissions.” Issue is that modeled chemicals do not include all the chemicals that DTSC proposes to authorize in its list of waste codes.

16

- “As in the 2011 Final HRA, the Screening Level HRAs calculate potential risks for several different receptors in accordance with input from DTSC (hypothetical commercial/industrial worker, ranch worker, and resident) and use the same exposure parameters to evaluate these receptors.” Again –reduced list of chemicals evaluated.

17

- “The results of this 2013 Screening Level HRA demonstrate that with respect to potential human health risk there is no substantial difference between the most recent year of AAMP data (October 2011 through September 2012) and the first four years of AAMP data (October 2006 through September 2010) evaluated in the 2011 Final HRA or the fifth year of data (October 2010 through September 2011) evaluated in the 2012 Screening Level HRA.” Again –reduced list of chemicals evaluated.

18

ADDENDUM & INITIAL STUDY/ ENVIRONMENTAL CHECKLIST TO THE FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT PREPARED FOR THE EXISTING B-18 CLASS I/CLASS II LANDFILL EXPANSION PROJECT KETTELEMAN HILLS FACILITY CHEMICAL WASTE MANAGEMENT, INC., MAY 21, 2013 [KINGS COUNTY]

- This Addendum and Initial Study/Environmental Checklist is described as having been prepared as an addition to the **Final Subsequent Environmental Impact Report (Final SEIR)** prepared for the KHF Project and certified by the Kings County Board of Supervisors, as the Lead Agency under CEQA, on December 22, 2009, State Clearinghouse Number 2005041064. (CEQA Guidelines, section 15164.) Please explain the basis for “piggybacking” on Kings County environmental documents when Kings County clearly did not understand or chose not to address the specifics various RCRA-specific elements of the California Code of Regulations, title 22 that would apply in the various environmental documents.

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- Part of the information presented in the **Final SEIR** is described as being derived from a draft submitted by CH2M-Hill that was subsequently modified by the Department of Toxic Substances Control “...to reflect its independent judgment and findings related to the

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potential impacts of the proposed B-18 Class I/Class II Landfill Expansion Project Kettleman Hills Facility, Chemical Waste Management, Inc.” This means that DTSC is responsible for the inconsistencies between its own regulations on COCs and the **Final SEIR** and the **SLHRA** including the substitution of a “COPC shortlist” for COCs (as represented by the chemicals and waste types covered by the EPA and California-only waste codes that DTSC proposes to authorize under its C3PM). Please address why DTSC believes that all of the wastes to be authorized for the next 30+ years should not be addressed by the **Final SEIR** and the **SLHRA** and provide the statutory and regulatory basis for that explanation.

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- Although CEQA Guidelines, section 15164 (c) state that an addendum need not be circulated for public review and comment, DTSC states that it is voluntarily circulating the “Addendum” with the draft C3PM. DTSC indicates that subsection (d) requires DTSC to consider the “Addendum” together with the original Final Environmental Impact Report (FEIR) prior to making a decision on the project. DTSC further indicates that subsection (e) describes the documentation required for the “Addendum” and that the subject “Initial Study/Checklist and Addendum” is the means for DTSC to provide the required documentation. In other words, these two elements put out to the public belong to DTSC and are subject to public comment. Since DTSC has chosen this usage to comply with CEQA, does this mean that it opens the window for CEQA lawsuits concerning this narrow application? If not, why not?

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- “The proposed expansion of the B-18 Landfill requires a Class III modification of the existing Hazardous Waste Facility Permit (HWFP) (No. 02-SAC-03) by DTSC, pursuant to California Health and Safety Code (HSC) Section 25200 (California’s Hazardous Waste Control Act (HWCA), originally adopted in 1972 (HSC Section 25101 et seq., and largely implemented in lieu of the federal Resource Conservation and Recovery Act of 1976), for the disposal of hazardous waste at the proposed B-18 Landfill expansion and new B-20 Landfill.” What is the B-20 landfill enter this picture? Where did that come from? Why it was not mentioned in the “Fact Sheet”? Basic Information blurb in Envirostor explains it --- --“CWM submitted a Class 3 permit modification to DTSC on December 12, 2008 for the expansion of Landfill B-18. If Landfill B-18 is permitted by DTSC, CWM will request a separate Class 3 permit modification from DTSC in the future for Landfill B-20.” **This needs to be clarified in the “Fact Sheet”**

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- “Each permit issued must also include terms and conditions as the Department determines necessary to protect human health and the environment from hazardous waste treatment, storage and disposal related activities. (HSC Section 25200; Cal. Code Regs., title 22, section 66270.32.) DTSC’s discretion in deciding whether to issue and, if so, how to condition issuance of the HWFP modification is therefore **proscribed** by statute (i.e., HSC Section 25200 et seq.) and the implementing regulation.” Last time I looked proscribed means banned---is this is what you want to say you? This would seem to mean that DTSC cannot “condition” the issuance of the C3PM.

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- “A responsible agency complies with CEQA by considering and commenting on the EIR prepared by the lead agency, and by reaching its own conclusions regarding whether and how to approve the project as it pertains to the scope of the responsible agency’s authority. (CEQA Guidelines, section 15069, subs. (a),(d).) DTSC reviewed and commented on the Draft SEIR and revised Draft SEIR sections prepared by the County, and received responses to those comments from the County as part of the Final SEIR. 2 DTSC relied on the Final SEIR for the B-18/B-20 Hazardous Waste Landfill project for reviewing and analyzing the proposed modification of the existing HWFP, and in determining whether to prepare an addendum or other environmental document.” This seems to mean that not adequately addressing air monitoring is DTSC’s fault not King’s County since DTSC relied on its own sole judgment. The inconsistency between the permitted COCs covered in the authorized waste codes of C3PM and the FEIR, FSEIR,

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HRA, etc. is DTSC's sole judgment? Note that the B-20 landfill pops up again. If it is not part of the "project" as described in the modification, then this document needs to be revised to refelect what is actually being public-noticed. If it is part of the project, then the "Fact Sheet" and other parts of the public notice package need to be revised. Either way, DTSC needs to get its act together on such things and re-notice.

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- "This Addendum and Initial Study/Environmental Checklist was prepared to evaluate the environmental effects of the proposed HWFP modification, including the phasing of the B-18 Landfill." Is the B-18 or B-18/20 subject of C3PM? Is the "phased B-18 Landfill Project" described in Section 4, the subject of the C3PM or the B18/20 or whatever?

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- "The Final SEIR, including the appendices, Draft SEIR and revised and recirculated sections of the SEIR (SCH No. 2005041064) are hereby incorporated by reference in their entirety as if fully set forth herein." Incorporated into what---this checklist or into the Class 3 Permit Modification itself?

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- "The SEIR is available for inspection at DTSC or through the County of Kings Community Development Agency." In a project of such visibility, with the SEIR incorporated into a DTSC document upon which a permit decision rests, the SEIR has to be made available in DTSC's Envirostor.

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- "The certified Final SEIR analyzes the expansion of the existing B-18 Landfill to add an additional 4.9 million cy of airspace to the currently permitted 10.7 million cy of air space, for a total permitted capacity of approximately 15.6 million cy. (SEIR, Revised Project Description and Analysis, pp. 2-1 to 2-3.)" Airspace is not a Title 22 CCR, term. It should be defined.

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- "A GCL below the secondary FML may be allowed in conjunction with a low-permeability soil liner." The design is not set yet?

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- [Checklist] "Pursuant to Pub. Resources Code, Section 21166, and CEQA Guidelines sections 15162 and 15164, subdivision (a), the attached Initial Study/Environmental Checklist and supporting documents have been prepared in conjunction with the determination by DTSC whether the Final SEIR for the B-18/B-20 Hazardous Waste Disposal Project prepared by the Kings County as the Lead Agency for the B-18/B-20 landfill expansion project, as supplemented by this Addendum, is the appropriate CEQA document to prepare and remains sufficient for purposes of TSC's approval of a Class III HWFP modification, and that no supplemental environmental review is required under CEQA." Back to the B-18/B-20 landfill expansion project. The B-20 should be removed.

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- [Checklist] "d. Expose sensitive receptors to substantial pollutant concentrations?" "(6) the project, in combination with other cumulative onsite landfill projects, could expose sensitive receptors to toxic air contaminants, which would be a less than significant impact at 2,000 feet and beyond the KHF boundary and would be significant and unavoidable at the boundary after mitigation;" This does not address the additional airborne emission deposition/accumulation would occur and pollutant concentrations in surface of soils.

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[Checklist] "Furthermore, because the phased construction of the B-18 Landfill expansion will not increase the amount of airspace or truck trips compared to what were analyzed in the SEIR, it would not result in any change to the findings regarding the less than significant potential for public health risks to residents of Kettleman, or the mitigation measures recommended in SEIR. Such a conclusion is supported by further reports requested by the US EPA, and prepared by Cal EPA and the California Department of Public Health (DPH), released after the SEIR was certified. On January 13, 2011, EPA released the results of the PCB Congener Study which found that PCB levels in and

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around the KHF were consistent with background levels in rural areas without known PCB activities or sources, and there was no evidence suggesting adverse health impacts from KHF activities to local community residents. (Wenck Associates, Inc., November 2010, "Final Dioxin-Like Polychlorinated biphenyl (PCB) Congeners Study," prepared for Chemical Waste Management, Inc. at the request of USEPA Region IX.). On December 31, 2010, Cal EPA and DPH issued a final report finding no evidence linking ongoing KHF operations with birth defects. (Cal EPA and DPH, "Investigation of Birth Defects and Community Exposures in Kettleman City," December 2010.)" This is all well and good but does not address the monitoring and off-site soil impact issues.

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- **"SEIR Mitigation Measures:** "AQ-MM.1 For the proposed Project, the Project proponent shall implement the following:"..... "Fugitive dust emissions from the B-18 Landfill expansion and the B-20 Landfill shall be controlled to meet the requirements of SJVUAPCD Regulation VIII, as applicable, to include, but not be limited to, the following:"...." Watering active construction/disposal areas", "Watering active unpaved roads", "Watering of daily cover stockpiles and the unpaved roads used to access the daily cover stockpiles", No deposition/accumulation monitoring is proposed. This is insufficient to meet DTSC's regulatory obligations.

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- "The phased construction of the B-18 Landfill expansion would include Temporary Phase IIIA Intermediate Fill Slope condition. Based on the results of the static stability analyses in Technical Report A, the Temporary Phase IIIA Intermediate Fill Slope condition for the B-18 Landfill expansion shown in Technical Report A, Appendix H.4 is considered adequately stable under static and seismic conditions. Therefore, no new impacts to geology and soils associated with phased construction of the B-18 Landfill expansion are anticipated, and it is also anticipated that there would not be an increase in the severity of a previously identified significant impact as analyzed in the SEIR. Furthermore, because the KHF and the Additional Projects discussed above that were proposed or approved after the certification of the SEIR are not in proximity to each other, the proposed HWFP modification, together with these cumulative projects and those analyzed in the SEIR would not result a new cumulatively significant impacts to geology and soils." Additional airborne emission deposition/accumulation would occur and this is not addressed.

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- **Hazards and Hazardous Materials.** "Would the project: a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?" No attention is given to airborne deposition/accumulation pathway. Moreover, the chemicals addressed do not represent the full range that DTSC proposes to authorize.

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- **"7.0 Findings and Conclusion** - The above evaluation and enclosed additional substantial evidence (e.g., Appendices A-C) supports the conclusion that preparation of a supplemental or subsequent EIR is not required prior to approval of the above-referenced Class III HWFP modification by DTSC, and that the Addendum and Initial Study/Environmental Checklist is the appropriate document for DTSC to prepare under CEQA for approval of the Class III HWFP modification request." This again does not square with DTSC CEQA obligations.

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- "As illustrated herein, the phased construction of the B-18 Landfill expansion is consistent with the Final SEIR and would involve only minor design modifications (CEQA Guidelines, section 15162, subdivision (a))." This is not really consistent with either DTSC statutes or regulations.

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- “8.0 Mitigation Monitoring Program As required by Pub. Resources Code, Section 21081.6 and CEQA Guidelines section 15097, a Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the B-18/B-20 Hazardous Waste Disposal Project by Kings County as the lead CEQA agency to monitor the implementation of the mitigation measures that have been adopted for the project. Any long-term monitoring of mitigation measures imposed on the overall Project will be implemented through the MMRP and any additional permit conditions imposed by DTSC under its statutory authority under Chapter 6.5 of the HSC and Cal. Code Regs., title 22.” This is not a satisfactory match to DTSC regulatory requirements.

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CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS OF FACT AND OVERRIDING CONSIDERATIONS [DTSC]

- P.3, ¶18 Findings of Fact – DTSC states that a set of Kings County documents are “...incorporated by reference.” Just what are they being incorporated into? Are they being incorporated directly into the C3PM in accordance with CCR Title 22? If so, then every single document cited becomes part of the RCRA-equivalent permit too. This means every single document must be bundled together with DTSC’s verbiage to constitute the whole C3PM and subsequently, upon approval, the whole permit. This means that DTSC needed to place **ALL** of these documents into Envirostor as elements of the C3PM for the **PUBLIC NOTICE**. DTSC deserves credit for making many of them available electronically but they are not “attached” to draft C3PM.

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CONDITIONS OF THE CLASS 3 PERMIT MODIFICATION

ASSURANCE OF FINANCIAL RESPONSIBILITY FOR CORRECTIVE ACTION

- Has corrective action financial assurance been established for the facility in accordance with the intent of Health and Safety Code (H&SC) §25200.10(b)? It is widely known that DTSC fails to comply with this statute, allowing permit applicants to defer the establishment of assurances of financial responsibility for corrective action at facilities. The usual means of deferral is through an enforcement order such as is cited in this draft permit. H&SC requires that, “*When corrective action cannot be completed prior to issuance of the permit, the permit shall contain schedules of compliance for corrective action and assurances of financial responsibility for completing the corrective action.*” [H&SC §25200.10(b)] Title 22 states “*That the permit or order [emphasis added] will contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action.*” [Title 22 CCR §66264.101(b)] Currently DTSC fails to require assurance of corrective action financial responsibility in the permits that it issues. Has it failed again to require such assurances of financial responsibility for corrective action?

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CLOSURE ISSUES

- Title 22 CCR should be guiding DTSC, e.g. Title 22 CCR 66264.310(a)(1)]. There appear to be differences between the regulations and the WDR closure description and that in the C3PM. These should be reconciled and the C3PM re-noticed. In particular there is concern about the proposed hydraulic conductivity (1x10⁻⁵ cm/sec) and thin cover over last layer of waste.

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- Title 22 CCR §66270.14 (b) [General information requirements.] states "The following information is required for all hazardous waste management facilities..." It is then specified under §66270.14 (b)(11)(A) that "...the owner or operator of a new facility or a facility undergoing substantial modification (a Class 3 modification specified in section 66270.42(c) involving physical changes to the facility) shall demonstrate compliance with the seismic standard..."
- "...or 2. if faults (to include lineations) which have had displacement in Holocene time are present within 3,000 feet of a facility, **no faults pass within 200 feet of the portions of the facility where treatment, storage or disposal of hazardous waste will be conducted, based on data from a comprehensive geologic analysis of the site.** Unless a site analysis is otherwise conclusive concerning the absence of faults within 200 feet of such portions of the facility **data shall be obtained from a subsurface exploration (trenching) of the area within a distance no less than 200 feet from portions of the facility where transfer, treatment, storage or disposal of hazardous waste will be conducted.** Such trenching shall be performed in a direction that is perpendicular to known faults (which have had displacement in Holocene time) passing within 3,000 feet of the portions of the facility where transfer, treatment, storage or disposal of hazardous waste will be conducted. Such investigation shall document with supporting maps and other analyses, the location of faults found."
- The RWCB states that the site is on the west flank of the North Kettleman Dome Anticline which is probably associated with blind thrusting. It then makes an odd statement that "No known Holocene faults exist within 200 feet of waste management units (WMUs) or the facility. In accordance with the most current geotechnical and seismic engineering practices, the Discharger determined a mean peak design horizontal ground acceleration of 0.57g. This acceleration was based on an assumed maximum credible earthquake of magnitude 6.6 on a ramp thrust fault rupturing at 10 km depth beneath the site." So no known fault within 200 feet but blind thrust rupture can occur beneath the "site". However, the nature of thrusts is that they are laterally extensive. **Therefore a Holocene fault is probably within 200 lateral feet of the site at unknown depth.** Neither DTSC nor the RWQCB address this. Secondary faults, splays, "flowering", etc. all need to be considered with regard to surface rupture at this site.
- Did DTSC require trenching and/or geophysics of the bedrock surrounding B-18 to determine if "lineations", secondary faults, splays or "flowering" of near-field North Dome Ramp Thrust fault segment extend to the surface under the original B-18 or the proposed expansion? If not, why not? It is clear that the King's County EIR ignores this but DTSC must comply with Title 22 and **PROBABLY HAS NOT IN THIS REGARD.** Furthermore, it cannot rely on the County's EIR to even satisfy its own CEQA obligations for the C3PM.
- Did *Slope Stability Analysis Report*, dated October 2010, by Hushmand Associates, Inc. consider rupture under the slopes and shaking together? If not why not?
- Title 22 CCR §66270.14(e) [California Environmental Quality Act (CEQA) Information Requirements.] states, in part, that "...the applicant shall submit with

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Part B of the permit application all information necessary to enable the Department to prepare an Initial Study meeting the requirements of Title 14, CCR section 15063." Compliance with this requirement appears to be inadequate with regard to seismicity and neither the application nor the King's County EIR appears to be satisfactory. Please address these issues properly and then re-notice the C3PM together with perhaps a revised "CEQA checklist" by DTSC.

CONSTITUENTS-OF-CONCERN

- Title 22 CCR 66270.1(d) states "Where waste discharge requirements are established pursuant to sections 13260 and 13263 of the Water Code, they shall be incorporated as a condition of the Hazardous Waste Facility Permit issued to the applicant pursuant to this chapter to the extent the Department determines the waste discharge requirements are not less stringent than this division or chapter 6.5 of division 20 of the Health and Safety Code." It also states "**The Department may establish in the permit more stringent requirements which the Department determines are necessary or appropriate to carry out this division of chapter 6.5 of division 20 of the Health and Safety Code.**" The Central Valley Regional Water Quality Control Board (CVRWQCB or just RWQCB) listed some 238 COCs in Table 2 (Constituents of Concern) of the WDRs that DTSC incorporated by reference into the C3PM. The RWQCB loosely groups them by U.S. EPA analytical methods (inorganic constituents by various methods such as Method 6010A; volatile organic constituents by Method 8260; semi-volatile organic constituents Method 8270; pesticides and PCBs by Method 8080; organo-phosphorous constituents by Method 8141, and; carbamate and urea pesticides by Method 632. **Are all of the chemicals that are being authorized under the C#PM for disposal at KHF accounted for in this RWQCB table of 238 COCs?** If not, why not? Title 22 CCR requires that COCs be addressed in **ALL MEDIA** under Articles 6 and 17-----not just ground water.
- Title 22 CCR §66264.93 [Constituents of Concern] defines COCs as "...the waste constituents, reaction products, and hazardous constituents that are reasonably expected to be in or derived from waste contained in the regulated unit." Rather clearly, **ALL** those wastes being permitted to be disposed at the KHF must constitute the core of the COCs. DTSC has lost sight of this regulation in proposing to approve this Class 3 Permit Modification (hereafter "C3PM") in several ways. First, the Fact Sheet/"Modification" that DTSC provided to the public, incorporates an only list of RCRA waste codes that the KHF will be allowed to accept. It cleverly avoids listing the actual COCs which, for all those codes, might further alarm and arouse the affected public. Second, DTSC "piggybacks" on environmental work done for the conditional use permit, etc., by and for the "local" Kings County Community Development Agency, for the "quasi-local" San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD), and efforts by its "sister agency" (RWQCB). Unfortunately, none these agencies considered the full range of COCs that are being permitted by DTSC in the COPCs of their risk analyses and mitigation measures. Please bear in mind that this is an operating facility and it may at any time over the period of the permit accept any and all of the actual chemicals that fall under the cited EPA and California-only waste codes. By lazily "piggybacking" on such deficient work

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that does not satisfactorily dovetail with the Title 22 requirements, DTSC has failed to comply with its own regulations concerning CEQA. Note, the locals also failed in their earlier environmental analysis but it is recognized that the SEIR and related documents are not themselves directly open to public comment. However, DTSC's inappropriate attempt to use them to support its decision and its "piggybacking" incorporation of them by reference is open to public comment. In order to be in accordance with its own statutes and regulations, DTSC must re-notice this draft "Modification". In doing so, it must make a choice to either reduce the EPA and California-only waste codes that will be allowed for disposal or it must do a comprehensive health risk assessment that includes **ALL** of the COCs that fall under the EPA and California-only waste codes that it wishes to approve for disposal. In either case DTSC cannot use the existing CEQA documents to support a proposed "Modification" decision since they do not, without supplement, reflect DTSC's regulatory requirements. Therefore, the agencies involved must either prepare another SEIR to address that fewer chemicals will be authorized and show a reduced set of waste codes or to address a new HRA for all the chemicals authorized for the proposed 24 years of operation.

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- DTSC must state in the C3PM that the COCs shall be all waste constituents, reaction products, and hazardous constituents that are reasonably expected to be in or derived from waste contained in the C3PM unit. [Title 22 CCR §66264.93]

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ENVIRONMENTAL MONITORING

The Envirostor general blurb for KHF states that "Under DTSC's HWFP, CWM is required to conduct a Groundwater Monitoring Program and Ambient Air Monitoring Program. The development of a Health Risk Assessment was required in the HWFP for the Ambient Air Monitoring Program." However, Title 22 CCR §66270.14(c)(6)(B) requires the Permittee to establish detection monitoring programs for **ALL** media, including air. Section 66264.701(a) requires the Permittee to conduct monitoring and response programs for various environmental media of the regulated unit, including air, pore-gas, and soil. DTSC has not adequately complied with the requirements of Title 22 CCR, Division 4.5, Chapter 14, articles 6 and 17 nor of Title 22 CCR §66270 et seq. for all environmental media. The following manifest just some of the concerns that have become apparent.

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Air

- DTSC describes in the general Envirostor blurb that the ambient air monitoring program at KHF was developed in compliance with permit conditions in DTSC's hazardous waste facility permit and Title 22 CCR §66264.700, et seq. It claims that the program is designed to protect human health and the environment, assess releases of volatile organic compounds, semi-volatile compounds, metals, and particulates. However, DTSC claims that historic waste profiles and the Facility's 1994 Emission Characterization Study were used to establish the list of COCs. This is inappropriate---DTSC must use the waste codes that it proposes to authorize.
- Title 22 CCR § 66264.704(a) states that DTSC "...will specify in the facility permit the hazardous constituents to which the environmental protection standard of

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§66264.702 applies." DTSC has not done this properly. It further states that "Constituents specified in the permit will be limited to constituents reasonably expected to be in or derived from waste contained in a regulated unit." Clearly the waste that is to be contained in the C3PM unit is the waste it is being permitted for. DTSC can either reduce the waste codes and chemicals that are being permitted for the C3PM unit or it can properly include them as constituents to be monitored. Emissions from single point in time, given all of the authorized waste codes, are not acceptable. Neither is basing 2013 monitoring on a 1994 study without even updating to the wastes received over the intervening 20 years. There are inconsistent numbers given for the ambient air monitoring stations in various project documents----although this may be explained by the single mobile station not being counted sometimes. This should be resolved. DTSC has not provided the required specification such that the public can reasonably discern it.

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Title 22 CCR §66264.704(a) states that "The facility **permit shall specify concentration limits** for soil, soil-pore gas, and open-air downwind from the regulated unit, for hazardous constituents established under section 66264.703." Simply including another agency's emissions permit does not suffice for all of the constituents covered by the RCRA waste codes that DTSC proposes to authorize. DTSC has not provided the required specification such that the public can reasonably discern it. The RWQCB established in its WDRs which DTSC incorporated by reference, that "The concentration limits for constituents of c1ncern (COCs) and monitoring parameters with greater than 90 percent non-numerical results shall be laboratory specific and specific to the analytical method being used and shall be established as follows: a. for these COCs, which include both organics and inorganics, the concentration limit shall be the Estimated Quantitation Limit (EQL) as described in the most recent edition of Manual SW-846 published by US EPA. Concentrations that lie between the EQL and the Method Detection Limit (MDL) shall be reported as traces." I request that DTSC do something similar in an AMRP for the KHF.

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- The on-going Ambient Air Monitoring Program (AAMP) at KHF is described as including a periodically-updated HRA that evaluates potential risks to human health in the immediate facility vicinity based on exposures through the inhalation pathway. What were the dates that HRAs have been performed since 1994 (the AAMP was approved in the Part B Permit in 2006 but surely air monitoring and HRAs went back to at least 1994)? When was the last one performed---2012 or 2013? Who is it submitted to? Provide the DTSC review/comments memo on Envirostor. If no DTSC review memo provide one from whoever else reviewed it. Did it include all of the chemicals covered under KHF's authorized waste codes? If not, why not? The C3PM must be revised to include such a requirement. Otherwise DTSC is acting inconsistent with its own regulations. Given DTSC's experience at lead smelters with off-site airborne emission deposition/accumulation, why is this not addressed as well as ambient air inhalation. DTSC is surely aware that the dry deposition module in the HARP model failed to predict the observed lead accumulations around Exide and Quemetco. Why is it accepting that same HARP model here without requiring deposition monitoring as part of the Air Monitoring and Response Plan (AMRP) required under Title 22 CCR §66264.700, et seq. The AAMP is not sufficient to satisfy the AMRP requirement, please justify its use as a substitute, e.g. no deposition monitoring for emitted particulates.

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- It appears that the air monitoring requirements for the closed C3PM are to be covered by the AAMP. DTSC needs to add "...and all subsequent revisions thereto." where it should be stating that the AAMP is serving to comply with Title 22 CCR §66264.700, et seq. Moreover, it needs to state that AAMP requirements are fully incorporated by reference into the environmental monitoring requirements of the C3PM.

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- Has the KHF used auto shredder waste as a daily cover in the past? Is the C3PM allowing this practice? If so, why? If not, is it specifically precluded?

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- DTSC must review the AAMP for consistency with the waste codes being authorized. It is expected that review will indicate the necessity for additional analytical parameters and/or air monitoring stations are necessary to ensure protection of human health and the environment.

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- Section 66264.701(a) requires the Permittee to conduct a monitoring and response program for air for the regulated unit. DTSC should require the Permittee to submit to DTSC, for review and approval, an Air Monitoring and Response Plan (AMRP) for the additional stations. This AMRP shall incorporate sampling procedures and analytical protocols that are in accordance with those needed for all chemicals in the proposed RCRA waste codes. This AMRP should be included as an exhibit to the Operation Plan. Sampling procedures and analytical protocols shall be in accordance with ALL applicable guidances for both ambient air and deposition monitoring.

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- The Permittee should also be required to comply with the results and recommendations of a Comprehensive Monitoring Evaluation (CME) to be conducted by DTSC with regard to air ---in particular airborne deposition and accumulation. [Title 22 CCR § 66270.32(b)(2)]

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- The hazardous constituents for the KHF C3PM unit to which the Environmental Protection Standard (EPS) shall apply should be listed in a table in DTSC's so-called "Attachment A".

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- The EPS concentration limits for air hazardous constituents at the C3PM should be those from the AAMP but for those constituents not included by the local air board DTSC should utilize the 2012 U.S. EPA Region 9 Regional Screening Levels (RSLs), and any subsequent revisions, for each such specific constituent. [Title 22 CCR §66264.704(a) and (b)]

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Soil-pore gas

- Landfill gas contains hazardous constituents and that a monitoring and response program must be conducted for soil-pore gas. [Title 22 CCR §66264.701 (a) and 66264.702(b)] In addition, the California Code of Regulations, title 22, section 66264.310(c) requires the Permittee to prevent lateral migration of waste, gas, and vapor from the landfill. Title 22 CCR §66270.14(c)(6)(B) also requires soil-pore gas monitoring. The monitoring and response plan shall include, at a minimum, the applicable elements of the California Code of Regulations, title 22.

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- The EPS concentration limits for soil-pore gas hazardous constituents at the C3PM unit could utilize the 2012 U.S. EPA Region 9 Regional Screening Levels (RSLs), and any subsequent revisions, for each specific constituent. [Title 22 CCR §66264.704(a) and (b)] However, The RWQCB established in its WDRs which DTSC incorporated by reference, that "The concentration limits for constituents of concern (COCs) and monitoring parameters with greater than 90 percent non-numerical results shall be laboratory specific and specific to the analytical method being used and shall be established as follows: a. for these COCs, which include both organics and inorganics, the concentration limit shall be the Estimated Quantitation Limit (EQL) as described in the most recent edition of Manual SW-846 published by US EPA. Concentrations that lie between the EQL and the Method Detection Limit (MDL) shall be reported as traces." I request that DTSC do either in an SPGMRP for the KHF.
- The concentrations for each specific constituent should be listed in a table in DTSC's so-called "Attachment A". [Title 22 CCR §66264.704(a) and (b)]
- Section 66264.701(a) requires the Permittee to conduct a monitoring and response program for soil-pore gas for the regulated unit. Soil-pore gas monitoring requirements for the C3PM are not described. The Permittee should be required to submit to DTSC, for review and approval, a Soil-pore Gas Monitoring and Response Plan (SPGMRP) for the additional stations. This SPGMRP shall incorporate sampling procedures and analytical protocols that are in accordance with DTSC and U.S. EPA guidances. This SPGMRP should be included as an exhibit to the Operation Plan.

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Soil

- Hazardous waste constituents may be emitted into the ambient air from the KHF. These airborne hazardous waste constituent emissions may deposit onto the land surface and accumulate as DTSC has established at the secondary lead smelters that it regulates in Los Angeles. Therefore, a monitoring and response program must be conducted for soil. [Title 22 CCR §66264.701 (a) and 66264.702(b)] In addition, the California Code of Regulations, title 22, section 66264.310(c) requires the Permittee to prevent lateral migration of **waste, gas, and vapor from the C3PM unit**. Deposition and accumulation of airborne landfill emissions clearly represents a form of "lateral migration" of waste. Title 22 CCR, §66270.14(c)(6)(B) also **requires soil-pore gas monitoring**. The monitoring and response plan shall include, at a minimum, the applicable elements of the California Code of Regulations, Title 22.
- Concentration Limits for air, soil-pore gas and soil are described in Title 22, CCR §66264.704(a) which states "The **facility permit shall specify** concentration limits for **soil**, soil-pore gas, and open-air downwind from the regulated unit, for hazardous constituents established under §66264.703." [emphasis added] Title 22 CCR § 66264.704(b) states, in part, that "The concentration limit for a hazardous constituent in soil outside the regulated unit shall not exceed the background concentration of that constituent in the soil..."

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- The EPS concentration limits for soil hazardous constituents at the C3PM unit could be based on the 2012 U.S. EPA Region 9 Regional Screening Levels (RSLs), and any subsequent revisions, for each specific constituent. [Title 22 CCR §66264.704(a) and (b)] However, the RWQCB established in its WDRs which DTSC incorporated by reference, that "The concentration limits for constituents of concern (COCs) and monitoring parameters with greater than 90 percent non-numerical results shall be laboratory specific and specific to the analytical method being used and shall be established as follows: a. for these COCs, which include both organics and inorganics, the concentration limit shall be the Estimated Quantitation Limit (EQL) as described in the most recent edition of Manual SW-846 published by US EPA. Concentrations that lie between the EQL and the Method Detection Limit (MDL) shall be reported as traces." I request that DTSC do something similar in an SMRP for the KHF.
- The soil monitoring issue is clearly related to the need to provide airborne emission deposition/accumulation monitoring. DTSC needs to work out the appropriate monitoring and response program to address the linkages.

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Ground Water

- Is the extension to the B-18 unit to be constructed over existing groundwater contamination? If so, why is this not mentioned in the "Fact Sheet" along with the various special provisions in the C3PM?
- Under "Basic Facility Information" --- it is stated that "The Facility shall comply with the groundwater monitoring requirements of Title 22 CCR §66294.90 et seq., and the Waste Discharge Requirements Order Number 98-058, and any groundwater monitoring provision in subsequent Waste Discharge Requirements (WDRs), issued by the Central Valley Regional Water Quality Control Board." This is good as far as it goes.
- It is further stated that "The groundwater monitoring system is designed to monitor the 13 major sandstone beds, and the groundwater monitoring well network consists of 67 wells. Currently, 46 of the wells are sampled as part of Detection Monitoring (25 wells), Evaluation Monitoring (13 wells), and Corrective Action Monitoring (8 wells) Programs. An additional 21 wells are used for depth to groundwater measurements to assist in determining groundwater gradients." It is excellent that the issues of dipping permeable units are recognized. It needs to be stated that some of these extend under the C3PM or B-18 unit [it is assumed that the B-20 unit will be the subject of a further permit modification as stated somewhere in the reference materials]. How many of these "major" dipping permeable horizons do extend under the C3PM unit? Are points-of-compliance (POCs) established in each sandstone bed under the CP3 unit? Is cross-dip migration going on under the C3PM unit? Are there multi-level POCs in each sandstone bed---situated down-dip of one another within the same bed under the C3PM unit? If not, why not?

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Yes

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- Direction and rate of contaminant migration appears to be highly dependent upon the geologic structure and the lithology. Ground water and dissolved contaminants probably move preferentially along the dipping saturated permeable

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sandstone beds and would be at least partially constrained by dipping finer-grained interbeds. Although the WDRs state that water flows along strike, in reality it must be cross-dip.

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- This does not mean that the uppermost aquifer as defined by Title 22 CCR §66264.97 is restricted through the shallow contamination investigation. Because ground water exists in various dipping permeable bedrock layers underlying the Facility, the uppermost aquifer needs to be defined as extending to the vertical (essentially the lateral downdip) limit of each hydrologically discrete layer or group of layers to where it is structurally or lithologically terminated.

- The vertical extent of contamination in a specific dipping permeable saturated bedrock layer of the uppermost aquifer cannot be determined by a well(s) emplaced in an adjacent layer if that layer is made either fully or partially hydrologically discrete by an intervening impermeable or semi-permeable fine-grained layer. This C3PM should contain conditions to ensure resolution of the remaining questions regarding the vertical extent of contamination in the dipping permeable saturated bedrock layers which comprise the uppermost saturated zone.

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- Title 22 states that the groundwater protection standard (GWPS), shall consist of the list of constituents-of-concern (COCs) [Title 22 CCR §66264.93], concentration limits [Title 22 CCR §66264.94], the point of compliance (POC) and all monitoring points [Title 22 CCR §§66264.92 and 66264.95]. A list of RCRA waste codes is not a satisfactory substitute for a list of COCs. Please be open and transparent and give the public--up front-- a list of **ALL** of the actual chemicals that will be permitted to be disposed at the KHF. DTSC clearly has the expertise to translate the RCRA waste codes it lists as being permitted to the chemicals being permitted for disposal and to which the public may be exposed. Title 22 CCR §66264.93 [Constituents of Concern] states, in part, that "For each regulated unit, the Department shall specify in the facility permit the constituents of concern to which the water quality protection standard of section 66264.92 applies." [emphasis added] Further, it defines COCs as "...the waste constituents, reaction products, and hazardous constituents that are reasonably expected to be in or derived from waste contained in the regulated unit." Rather clearly, **ALL** those wastes being permitted to be disposed at the KHF must constitute the core of the COCs. To these must be added those chemicals that could be "reaction products" or "reasonably expected to be in or derived from waste contained in the regulated unit. Please don't attempt to split hairs about contained in the unit---DTSC's MRP for KHF must address the chemicals that are being permitted for disposal. Moreover, DTSC must specify this in its own written attachment to the permit---either together with or in lieu of the arcane RCRA waste codes that it has put in front of the public.

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- It should be required that the Permittee shall, at a minimum, discharge the responsibilities specified in Title 22 CCR §66264.98. [Title 22 CCR §66264.90] Therefore, in addition to monitoring for the parameters specified by the California Code of Regulations, title 22, section 66264.98(e), the Permittee SHALL periodically monitor for ALL COCs identified pursuant to §66264.93 ---ALL---- and determine whether there is statistically significant evidence of a release for

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ANY COC. DTSC cannot cut corners on these COCs-----since it is the agency deciding what wastes (all those waste codes in the draft permit) can be accepted by KHF. So, did DTSC include a condition in the Permit that the Permittee shall monitor ALL detection monitoring wells for ALL COCs at least every five years? [Title 22 CCR §66264.98(g)]? If not, why not? In addition to incorporating the WDRs, DTSC has an obligation to satisfy its other regulations. Note that the RWQCB requires COC monitoring every 5 years----for a subset of its list of COCs that **MAY BE LESS THAN ALL OF THE CHEMICALS THAT DTSC IS AUTHORIZING KHF TO MANAGE**. DTSC must require ALL COCs as defined by the wastes being accepted. Title 22 CCR 66270.1(d) allows DTSC to be more stringent than the WDRs.

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- The WDRs are uploaded in DTSC's EnviroStor under the "Community Involvement" tab. These should be attached to the Permit not just in this particular tab.
- "Quarterly groundwater monitoring reports are uploaded to the State Water Resources Control Board's GeoTracker database, by going to the following link and then going to the "Site Maps/Documents" tab. "These should also be in Envirostor under the Permit itself.
- Therefore, I request that a condition be added to the C3PM that within one hundred twenty (120) calendar days after the effective date of the CP3, the Permittee shall submit a revised Groundwater Quality Monitoring and Response Plan ("GWMRP") for DTSC review and approval, which shall fully encompass the requirements of the California Code of Regulations, title 22, chapter 14, article 6. It shall specifically provide the following: the methodologies for well and piezometer construction, including design, drilling, materials and installation, well development, and well decommissioning. Among the things that need to be revised; (1) the POCs need to be better defined with regard to the relationship of dipping permeable units; (2) the whole issue of COC monitoring at least once every five years needs to be addressed---**ALL** waste code chemicals listed, analytical methods described, etc. [Title 22 CCR §§66264.91(b), 66264.97(b), 66270.14(b)(6) and (7), 66270.14(b)(19), 66270.32(b)(2)]

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Surface Water

- Good job to address this as part of the C3PM and it is nice that "Surface water run-off is controlled by facility design and is generally monitored through storm water permits issued by the Regional Water Quality Control Boards." but this is typically not enough to really satisfy Title 22 CCR §66264.91(a). In particular the COC issue needs to be reconciled.
- I request that a condition be added to the C3PM that within ninety (90) calendar days after the effective date of this C3PM, the Permittee shall submit a Surface Water Quality Monitoring and Response Plan (SWQMRP) to DTSC, which shall encompass **ALL** of the requirements of the California Code of Regulations, Title 22, Chapter 14, Article 6. The SWQMRP needs to be included as a new exhibit in the Operation Plan. Elements of the monitoring and sampling program should include sample acquisition, preservation, transport, chain-of-custody, analysis

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methodologies, and reporting requirements. [Title 22 CCR §66264.91(a)]

Soil-pore Liquid (Unsaturated Zone Monitoring)

- Good job to pay attention this in the C3PM. It is stated that “The monitoring goal of the system is similar to the groundwater system, which is to monitor the water bearing zone (WBZ) sands which **crop** out beneath waste units and which provide a downdip pathway for liquid or gas releases.” It is further stated that “Both the active soil gas wells and the moisture probes target the entire thickness of the target WBZ sands, with the paired soil gas probes being screened across the full thickness of the sands.” This is not necessarily sufficient, for example monitoring should target the upward extension of the dipping “WBZ” beds through the vadose zone---their “entire” unsaturated thickness---to the liner. Even this may not be appropriate. The RWQCB adopted unsaturated zone monitoring in its WDRs that do not match the DTSC statement.

When DTSC incorporated the WDRs, it included the statement “The Discharger has demonstrated that the collection of soil-pore liquid samples with lysimeters or similar suction-based technology based component of an unsaturated zone monitoring program is not feasible under ambient conditions at the site.”

Similarly, it incorporated **that** “The Discharger has demonstrated that measurement of relative moisture changes in the unsaturated zone with a **neutron probe is one method that can provide for the early detection of a release.**”

However, it also states that “**The retrofitting of WMUs with unsaturated zone monitoring systems or devices will be in accordance with Provision 13a of this Order.**” **Puzzling, but something DTSC needs to address. Finally, it incorporated that “Landfills B-18 and B-19 are equipped with XXX-foot wide, 2- foot deep trenches installed below the axial low points of the WMU containment systems. The trenches are lined with 80-mil HDPE geomembrane, are packed with high transmissivity granular material, and terminate at unsaturated zone collection sumps located below the secondary leachate collection sumps of each landfill.**

The unsaturated zone collection sumps serve as the unsaturated zone monitoring points for each landfill unit.” This last does not comply with the requirements of Title 22 CCR.

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- Title 22 CCR §66264.97(d) requires the Permittee to establish an unsaturated (vadose) zone monitoring system for each regulated unit. Section 66270.14(c)(6)(B) requires the Permittee to establish detection monitoring programs for all media, including soil-pore liquid. Soil-pore liquid monitoring in the vadose zone is generally performed to provide detection and evaluation monitoring of dissolved-phase and free liquid-phase releases from a regulated unit for earliest possible detection of a release and for data to evaluate changes in water quality in the vadose zone due to a release. It is not merely enough to monitor ground water and wait for a release to propagate in the water to the point-of-compliance. Any detection monitoring program needs to be geometrically viable to address releases to the vadose zone **BEFORE** ground water is impacted.

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- Therefore, I request that a condition be added to the C3PM that within ninety (90) calendar days after the effective date of this C3PM the Permittee shall submit a

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Soil-pore Liquid Monitoring and Response Plan (SPLMRP) to DTSC, which shall encompass **ALL** of the requirements of the California Code of Regulations, title 22, chapter 14, article 6. The SPLMRP needs to be included as a new exhibit in the Operation Plan. Elements of the monitoring and sampling program shall include sample acquisition, preservation, transport, chain-of-custody, analysis methodologies, and reporting requirements. [Title 22 CCR §66264.91(a)]

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I request that DTSC deny any expansion at CWM's Kettleman City facility until the following activities are undertaken, at a minimum:

- Comprehensively address all seismic hazards that could the facility,
- Do a CEQA assessment of all of the impacts, such as airborne emission deposition and accumulation, using a comprehensive site-conceptual model,
- Spelling out the exact chemical names being authorized for KHF to the public --- not **JUST** reciting the EPA/California Waste codes,
- Making specific changes to the environmental monitoring conditions, etc. to bring them into compliance with Title 22 CCR, and
- Re-notice the Class 3 Permit Modification.

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Thank you for your consideration.

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CHANGE Campaign Director
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COCS

Since the RWQCB's WDRs are incorporated into the permit by reference, the COCs cited in Table



REMY | MOOSE | MANLEY
LLP

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Andrea K. Leisy
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October 25, 2013

VIA ELECTRONIC & REGULAR MAIL
Wayne.lorentzen@dtsc.ca.gov

Wayne Lorentzen
Project Manager
California Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

Re: Draft Hazardous Waste Facility Permit Class 3 Modification for the
Chemical Waste Management, Inc., Kettleman Hills Facility (EPA
Identification No: CAT000646117)

Dear Mr. Lorentzen:

On behalf of our client Chemical Waste Management, Inc. ("CWMI"), we submit the following comments and proposed revisions on the draft CEQA Findings of Fact for the Draft Hazardous Waste Facility Permit modification for the Kettleman Hills Facility ("KHF") ("Draft Permit" or "HWFP").

For ease of review, our comments are presented in numerical order noting the page number of the Findings, the language in question, and the suggested revisions (if any). Language proposed to be added is shown in underline, and language suggested for deletion is shown in ~~strikeout~~ format. Our comments are as follows:

Page 1:

Responsible Agency Contact Person should be revised as follows:

Responsible Agency Contact Person: ~~Chuck Kinney, Deputy Director Planning, Kings County Community Development Agency~~ Wayne Lorentzen, Project Manager, Department of Toxic Substances Control

Comments: As DTSC is the Responsible Agency for purposes of the California Environmental Quality Act (Pub. Resources Code, § 21000, et seq.), the Responsible Agency Contact Person should list a person from DTSC, not Kings County.

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Page 4:

Significant and Unavoidable Impacts, the last sentence in the description of “Air Quality – (AQ-1) Periodic Construction and (AQ-2) Operations and Long-Term (Cumulative) Operations Impacts” should be revised as follows:

These changes have been adopted by Kings County ~~or can and should be adopted by this agency.~~

Comments: Kings County adopted the changes (i.e., the suggested mitigation) when it approved the CUP for the B-18/B-20 expansion Project in December 2009.

Page 5:

Significant and Unavoidable Impacts: Transportation—Cumulative should be revised as follows:

Mitigation measures (TT-MM.1, TT-MM.2, and TT-MM.3) for the roadway improvements include preparation and approval of a construction traffic management plan and Chemical Waste Management’s fair share contribution toward specified future roadway improvements on SR-41 and I-5.

Comments: The existing language neglected to describe the construction traffic management plan required under TT-MM.2. The further edits were intended to clarify that the mitigation measures include specific improvement on specific roadways.

Page 6:

Significant and Unavoidable Impacts, the last sentence in the description of “Greenhouse Gas – Cumulative GHG-3 Result in increased exposure to one or more of the potential adverse effects of global warming identified in the California Global Warming Solutions Action of 2006 (Less than Significant with Mitigation on a Project basis but Cumulative Significant and Unavoidable)” should be revised as follows:

These changes have been adopted by Kings County ~~or can and should be adopted by this agency.~~

Comments: Kings County adopted the changes (i.e., the suggested mitigation) when it approved the CUP for the B-18/B-20 expansion Project in December 2009.

Page 6:

Significant and Unavoidable Impacts, the last sentence in the description of “Public Health Risk (AQ-5, Toxic Air Contaminants - Cumulative)” should be revised as follows:

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These changes have been adopted by Kings County ~~or can and should be adopted by this agency.~~

5


Comments: Kings County adopted the changes (i.e., the suggested mitigation) when it approved the CUP for the B-18/B-20 expansion Project in December 2009.

* * * *

Thank you in advance for your consideration of our comments.

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Very truly yours,


Andrea K. Leisy



REMY | MOOSE | MANLEY
LLP

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Andrea K. Leisy
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October 25, 2013

VIA ELECTRONIC & REGULAR MAIL
Wayne.lorentzen@dtsc.ca.gov

Wayne Lorentzen
Project Manager
California Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

Re: Draft Hazardous Waste Facility Permit Class 3 Modification for the Chemical Waste Management, Inc., Kettleman Hills Facility (EPA Identification No: CAT000646117) – Specific Revisions & Comments on Draft Permit Conditions

Dear Mr. Lorentzen:

On behalf of our client Chemical Waste Management, Inc. (“CWMI”), we submit the following comments on the Draft Hazardous Waste Facility Permit modification for the Kettleman Hills Facility (“KHF”) (“Draft Permit” or “HWFP”). As you are aware, CWMI began the environmental review and permitting process for this project over nine (9) years ago, including three years of litigation over the adequacy of the Subsequent Environmental Impact Report (“SEIR”) certified for the project and upheld by both the superior court and the Fifth District Court of Appeal in its entirety. By providing 111 days for public review and comment on the draft permit DTSC has gone above and beyond what is required by regulation (e.g., not less than 45-days).

We urge DTSC to consider the comments received and move expeditiously to make a final decision on the permit consistent with the Legislature’s directive to preserve the state’s existing hazardous waste disposal facilities. (See Health & Saf. Code, §§ 25146 [the decreasing number of active hazardous waste disposal facilities in the face of increasing demand is a problem in California]; 25146.5, subd. (a) [the Legislature has therefore deemed it a matter of urgent public necessity and statewide concern to preserve the number of existing hazardous waste facilities].)¹ This includes preserving KHF.

¹/ “[The] safe and responsible management of hazardous wastes is one of the most important environmental problems facing the state at the present time. It is critical to the protection of the public health and the environment, and to the economic growth of the state. If environmentally sound hazardous waste facilities are not available to effectively manage the hazardous wastes produced by the many industries of the state, economic activity will be hampered and the economy cannot prosper.” (Health & Saf. Code, § 25135, subd. (a)(5).)

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We offer the following specific comments and proposed revisions to the draft conditions with hope that DTSC will clarify its final conditions, particularly with respect to CWMI's future reporting obligations. We also offer specific edits to conditions that are duplicative of existing requirements (e.g., as mitigation or CUP permit conditions etc.).

For ease of review, our comments are presented in numerical order noting the page number and section of the Draft Permit, the condition in question and the suggested revisions (if any). Language proposed to be added is shown in underline, and language suggested for deletion is shown in ~~strikeout~~ format. Our comments are as follows:

Page 1:

Cover Page should be revised as follows:

Owners Name:
Chemical Waste Management, Inc.

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Page 4:

Part II. DESCRIPTION OF THE FACILITY AND OWNERSHIP should be revised as follows:

1. The facility owner is CHEMICAL WASTE MANAGEMENT, INC. (hereafter "owner").

Comment:

The facility is both owned and operated by CWMI. Thus, references to "Waste Management, Incorporated" and "Chemical Waste Management, Incorporated" used throughout the Draft Permit should be replaced with "Chemical Waste Management, Inc." Please consider this a global comment.

Page 4:

Part II. Subsection 4, DESCRIPTION should be revised as follows:

. The Facility also has a permit, issued by the former California Integrated Waste Management Board, now CalRecycle, to receive municipal/solid wastes into the converted landfill Unit B-19.

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Page 9:

Part III, section 4(A)(1)(d) should be revised as follows:

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- (d) ~~Ambient air samples for polychlorinated biphenyls (PCBs) shall be collected for a 28-day period, on a quarterly cycle, unless as otherwise specified by DTSC. Within 90 days of the final decision on the class 3 permit modification request submitted on December 12, 2008, the Permittee shall submit for DTSC approval a proposed modification of the Ambient Air Monitoring Program and related work plan to collect ambient air samples for polychlorinated biphenyls (PCBs) for a monthly period, on a quarterly cycle, unless as otherwise specified by DTSC. Upon approval by DTSC, the revised ambient air monitoring work plan shall be implemented within 180 days.~~

Comment:

Under the existing Ambient Air Monitoring Program (AAMP) and Site Specific Ambient Air Monitoring Plan (SSAAMP), developed in accordance with USEPA and DTSC guidance and most recently approved for the Facility by DTSC in 2010, the site already samples for PCBs and pesticides, in addition to volatile organic compounds (VOCs), carbonyl compounds, and PM10 metals as part of its monitoring program. Specifically, under the existing AAMP/SSAAMP, sampling (including sampling for PCBs and pesticides) is conducted at three ambient air stations around the immediate facility boundary every 12 days for a 24-hour period per sample. The draft condition would result in overlapping sampling requirements for PCBs with the existing SSAAMP. As such, CWMI requests that any additional or revised sampling be included as part of an amended SSAAMP, and be conducted in lieu of the existing 12-day sampling requirements.

As drafted, it is unclear whether the 28-day sampling of PCBs would be in lieu of, or in addition to, the existing 12-day sampling required by DTSC. If required to conduct the 28-day sampling CWMI requests that such sampling be in lieu of the 12 day sampling. It is also unclear what precise methods would be required to be employed for this sample of PCBs. Would, for example, the 28-day period consist of four sampling events that are five-days in duration with filter exchange and equipment calibration between each sampling event as was discovered to be needed during past monitoring events described below? Please clarify.

Please also verify whether the "28-day period" collection interval in the Draft Permit comes from the CalEPA *Kettleman City Community Exposure Assessment*, November 2010? If so, please note that PCBs were just one set of many chemicals that were monitored in that Assessment. As DTSC may recall from that effort, the polyurethane foam (PUF) samplers used to collect the air samples cannot run more than five or six days, when the quartz-fiber filter (QFF) must be changed and the machine re-calibrated. This process is repeated four times during the one month sample event, resulting in one PUF and four QFFs to be analyzed. CARB reported "[s]amples were collected for five to six days," but CWMI believes that DTSC will want KHF to be more exact than that.

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As such, CWMI requests that the PCBs monitoring required by this condition should be modified and incorporated into a revised/updated AAMP/SSAAMP. Doing so would be consistent with DTSC's past practice as demonstrated in the HWFP 02-SAC-03 (effective June 16, 2003), wherein the permit did not specify the chemicals of concern, exact monitoring methods to be used, QA/QC, etc., recognizing that these items and methodologies may change over time. Thus, the 2003 HWFP presented a broad scope and vision of the AAMP and required KHF to submit an AAMP with specific details for discussion and DTSC approval before implementation. (See 2003 HWFP, Part III, Section 4.)

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Consequently, CWMI requests that DTSC require the specifics surrounding any additional sampling for PCBs to be included as part of a revised and updated SSAAMP, subject to DTSC's final review and approval. Upon approval of the modified AAMP/SSAAMP KHF will need 180 days to ensure its ability to acquire, install and calibrate the additional necessary equipment.

Page 9:

Part III, section 4(A)(1)(e) should be revised as follows:

- (e) Within 90 days of the final decision on the class 3 permit modification request submitted on December 12, 2008, the Permittee shall submit for DTSC approval a proposed location modification of the Site Specific Ambient Air Monitoring Work Plan for one additional ambient air monitoring location for ambient air sample collection. The additional station shall be located between the active hazardous waste landfill operations and Kettleman City, on CWMI property. The new monitoring station shall operate at the same frequency as the Permittee's current three air monitoring stations to assess releases of volatile organic compounds, semi-volatile carbonyl compounds, PM10 metals and particulates, PCBs and pesticides, that are emitted when the predominant wind direction is from the facility toward Kettleman City. Upon approval by DTSC, the revised ambient air monitoring work plan shall be implemented within 180 days.

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Comment:

As discussed above, revisions to the existing SSAAMP are necessary to ensure consistent implementation of the existing KHF ambient air monitoring program. As such, this condition is best satisfied by including language that is consistent with the existing sampling requirements (e.g., by listing carbonyl compounds, PM10 metals etc.), and revising the existing SSAAMP to include an additional air monitoring location subject to DTSC's approval. Upon approval of the modified SSAAMP, KHF will need 180 days to complete all tasks necessary to make the additional monitoring station operational,

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including constructing the new monitoring station, extending power to the location, and purchasing and installing a set of air monitors.

Furthermore, because the condition, as originally drafted, implied that monitoring from the additional station was only required when winds blow towards Kettleman City, we suggested a revision to reflect CWMI's anticipation of running this new station at the same frequency as the three existing air monitoring stations, then using the accumulated data in the approved health risk assessment process.

4

Pages 9-10:

Part III, section 4(A)(5) should be revised as follows:

- (5) To ensure that air emissions do not result in unacceptable risks to human health, the Permittee ~~shall~~ prepared a Health Risk Assessment (HRA) in accordance with the DTSC-approved ambient air monitoring program work plan.

Estimated risks ~~were~~ are to be based on data collected during a one-year monitoring cycle and quantified at the facility boundary. The initial HRA ~~was shall be~~ submitted 180 days after the end of the first-year monitoring cycle. ~~Thereafter,~~ The Permittee shall provide an annual update to the HRA based on newly-collected data. Previous HRA work may be incorporated with DTSC's prior approval.

Risk estimates are to be evaluated against a cumulative cancer risk of one in a million and a non-cancer hazard index of 1.0 for short- and long-term exposures.

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Comment:

One of the initial Health Risk Assessments for KHF was submitted on April 21, 2008, which included ambient air monitoring data collected during the first five quarters of the program. This Health Risk Assessment was completed again in 2011 and encompassed ambient air monitoring data collected during the first sixteen quarters (October 2006 through September 2010) of the program. Two annual updates to the Health Risk Assessment have since been completed and submitted to DTSC in April 2012 and again in March 2013. All of the Health Risk Assessments conducted to date have found no significant adverse impacts (direct or cumulative) to human health from operations at KHF. CWMI therefore requests that DTSC update the language in this condition to reflect that annual updates to the HRA will be provided.

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Page 11:

Part III, section 4(C) states:

~~(C) The Permittee shall conduct an annual meeting in Kettleman City to provide a summary of the environmental monitoring results from the prior year to the public. The summary shall include groundwater and ambient air monitoring results.~~

Comment:

It is unnecessary to include this condition in the HWFP because an annual meeting is already required as part of the Conditional Use Permit ("CUP") approved by the County for the Project as a result of compliance with the Tanner Act process. Specifically, the Local Assessment Committee's ("LAC's") Final Report and Recommendations from April 16, 2009, states:

CWMI shall ensure that (1) the independent consultants hired by CWMI to prepare air quality and water quality monitoring and compliance reports shall prepare an annual summary of the reports in layperson's terms, in Spanish and English, and shall deliver copies of the summary to all post office box-holders in Kettleman City, with a copy to the Kings County Community Development Agency, on or before the 31st day of March of each year of operation of the Proposed Project, and (2) *CWMI shall conduct an annual meeting in Kettleman City to which the San Joaquin Valley Air Pollution Control District, the Kettleman City Community Services District and the public agencies responsible for emergency planning and response shall be invited, to provide information to local residents.* (Emphasis added.)

This condition was made part of the adopted CUP. (See Kings County Resolution No. 09-073, p. 16, Condition C.7 (Dec. 2009).) As such, KHF is already required to conduct an annual public meeting in Kettleman City to present and discuss monitoring.

Page 11:

Part III, section 4(D) should be revised as follows:

(D) The Permittee shall construct a "secondary containment system" that will isolate any spills of hazardous waste ~~constituents~~ at the Bulk Sampling Platforms and the Untarping Racks ~~sample rack~~ from contact with the ground surface. Within 90-days of approval of the permit modification request submitted on December 12, 2008 to DTSC, the Permittee shall submit an engineering plan for a secondary containment system. Once

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approved by DTSC, CWMI will have 180-days to construct the permitted secondary containment system.

Comment:

CWMI requests clarification regarding this provision. It is unclear whether “sample rack” is referring to the “Bulk Sampling Platforms” or the “Untarpping Racks” or both? Furthermore, it is unclear as to what type of containment system would satisfy this condition. CWMI believes a permitted secondary containment system would be appropriate to isolate any leakage from transportation equipment delivering to KHF. CWMI would need 90-days to submit a design for approval by DTSC and 180 days to construct thereafter.

7

Page 11:

Part III, section 6 should be deleted because it is inapplicable to KHF:

~~6. WASTE MINIMIZATION CONDITIONS~~

~~The Permittee shall comply with the Hazardous Waste Source Reduction and Management Review Act (SB 14) requirements that are specified in the HSC, sections 25244.19, 25244.20 and 25244.21, and any subsequent applicable statutes or regulations promulgated thereunder. This would include submittal of SB 14 documents to DTSC upon request. DTSC may require the Permittee to submit a more detailed status report explaining any deviation from, or changes to, the approved waste minimization plan.~~

8

Comment:

KHF is an offsite receiver of hazardous waste. As such, it is exempt from the requirements of SB 14 under Health and Safety Code Section 25244.15(d)(3) which states:

(3) Notwithstanding paragraph (1), Sections 25244.19, 25244.20, and 25244.21 do not apply to any generator whose hazardous waste generating activity consists solely of receiving offsite hazardous wastes and generating residuals from the processing of those hazardous wastes.

The draft condition should therefore be deleted as inconsistent with the statute.

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Page 24:

Part IV, UNIT SPECIFIC SPECIAL CONDITIONS, Item 4 should be revised as follows:

4. The Permittee shall reject all high density polyethylene geomembrane liner materials that are damaged during installation under windy conditions. The definition of "wind damage," and the required remediation necessary for both preventing and repairing wind damaged geomembrane liner materials, are to be addressed by the Permittee and submitted for DTSC's review and approval within the text of the Construction Quality Assurance Plan (or plan addenda) required for each new surface impoundment construction or closure construction project. These plans (or addenda) require a permit modification in accordance with Cal. Code of Regs., title 22, sections 66270.41 and 66271.4 for approval.

9

Comment:

The above suggested revisions reflect omitted language that is from Item 4 of the 2007 HWFP modification, missing from the current Draft Permit.

Page 25:

Part IV, Landfill units B-18 and B-19, Activity Description, Paragraph 2 (last paragraph on the page), should be revised as follows:

As noted above, there is one active landfill, Unit B-18, permitted to accept hazardous wastes. The hazardous waste portion of Unit B-19 has undergone ~~delayed closure and is currently under Post-Closure care. the remaining unused portion of the landfill has been converted to accept municipal solid waste/designated wastes only in accordance with Cal. Code of Regs., title 22, section 66264.113(d). DTSC retains authority over closure of the entire unit.~~

Comment:

Because the closure of the existing hazardous portion of B-19 is complete, KHF is not subject to delayed closure. Closure activities were completed in phases, including partial closure activities completed in February 1999. DTSC certified partial closure on June 30, 1999. Final closure and stability berm completion was on December 22, 2006. The "Construction Quality Assurance Report Landfill B-19 Class I Final Closure, Stability Berm and Drainage, 2006 Construction" was finalized on May 17, 2010, with CVRWQCB concurrence issued July 15, 2010. KHF is still awaiting DTSC's final concurrence on final phases of closure. It is for these reasons that CWMI suggests amendments to the draft condition to reflect past closure of the hazardous waste portion of B-19.

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KHF should be allowed to reduce the Closure Cost Estimate to reflect the work that has been completed. Moreover, KHF included an updated Closure and Post-Closure Cost Estimate reflecting the work completed on B-19 in the Part B Permit Renewal Application. Closure and Post-Closure of the B-19 Landfill was also analyzed in the 2005 SEIR for the approved B-19 Landfill Bioreactor Project, which required post-closure monitoring and maintenance of the B-19 Landfill in compliance with the applicable requirements of CCR Titles 27 and 22. (See CWMI B-19 Bioreactor Project Draft Subsequent EIR, pp. 2-26 to 2-28 [excerpts included as Attachment A].)

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Page 27:

Part IV, Landfill unit B-18, MAXIMUM CAPACITY table, should be revised as follows:

B-18 Total Capacity (cubic yards) 15,6700,000

Comment:

The requested increase in total capacity at B-18 is up to 15,600,000 cubic yards, not 15,700,000 cubic yards. (See NOD filed for SEIR (SCH No. 2005041064 [approving project and 4.9 additional million cy for B-18]; see also KHF B-18/B-20 Hazardous Waste Disposal Project Draft Subsequent Environmental Impact Report, Revised Project Description and Analysis (May 2008), p. 2-7.) Please consider this a global comment on the entire Draft Permit.

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Page 29:

Part IV, Landfill units B-18 and B-19, Unit Specific Conditions, section 8 should be revised as follows:

For purposes of waste analysis pursuant to Cal. Code of Regs., title 22, section 66264.13, leachate from the Leachate Collection and Removal Systems at the B-18 landfill shall be sampled and analyzed quarterly for a period of one year, ~~for~~ ~~Constituents of Concern as defined in the Monitoring and Reporting Program issued by the Central Valley Regional Water Quality Control Board.~~ Thereafter, leachate sampling and analysis shall be conducted annually. Sampling shall be conducted from the sampling ports at the risers.

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Comment:

“For purposes of waste analysis,” and as previously approved by EPA, leachate at KHF is currently analyzed for waste code “F039” constituents as part of the waste analysis plan required by section 66264.13, subdivision (b). The F039 analytical results are reviewed to determine the proper waste treatment, storage and disposal options for F039 leachate.

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The WDR/Monitoring and Reporting Program (M&RP) "Constituents of Concern" (COC) are therefore a different set of "waste constituents, reaction products and hazardous constituents that are reasonably expected to be in or derived from waste contained in a regulated unit." (See Cal. Code Regs., tit. 22, § 66260.10; see also Titles 23 and 27.) Although COC analytical results are also used in the WDR/M&RP leachate and groundwater monitoring programs, that is for a very different purpose (e.g., water quality) rather than for "purposes of waste analysis" and therefore involves very different data sets of analysis. The language in the draft condition is therefore inaccurate and CWMI requests that it be deleted.

12

Page 29:

Part IV, Landfill Unit B-18, Unit Specific Conditions, section 9 should be revised as follows:

9. The Permittee shall conduct an aerial or land survey of active hazardous waste landfills annually. The Permittee shall submit the digital data from the aerial or land survey ~~and a summary of the data~~ by ~~March 1~~ June 1 of each year. ~~The summary shall include the content required in Cal. Code of Regs., title 22, section 66264.309.~~ The Permittee shall submit an estimate of the airspace consumed for the month for each active hazardous waste landfill to DTSC on a monthly basis.

Comment:

KHF currently provides either an annual aerial survey or land survey with digital data and a monthly tonnage report to DTSC and will continue to do so. June 1st is requested to provide this information in the future due to normal company landfill flyover schedules and processing time.

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Furthermore, the requirement that CWMI submit a summary of the data consistent with the content requirements of Title 22 Section 66264.309 should be deleted.

A summary of the data from the aerial survey is not necessary for CWMI to comply with Title 22 section 66264.309 because the content required by this section is already provided in the site's operating record which contains grid sheets identifying the location of the waste within the landfill and waste profiles identifying the waste type. As such, the conditions of 66264.309 are already being satisfied.

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Page 32:

LIST OF CLOSED, INACTIVE, AND NON-CONSTRUCTION UNITS should be revised as shown:

NAME OF UNIT	STATUS	PERIOD OF OPERATION
Landfill B-19	Partially closed (h Hazardous waste portion closed Final Closure occurred May 17, 2010 December 2006), with concurrence by the RWQCB on July 15, 2010. DTSC Concurrence still pending. converted to a Municipal/ Solid Waste Landfill. Final Closure will occur upon completion of the Municipal/ Solid Waste Landfill, in accordance with Cal. Code of Regs., title 22, section 66264.113.	1987-2006 [B-19 hazardous waste portion] 1987 – present

14

Comment:

For the same reasons explained above regarding page 25, Part IV, Landfill Unit B-18, the closure of the existing hazardous portion of B-19 has been completed. An updated Closure and Post-Closure Cost Estimate reflecting the work completed on B-19 is included in the Part B Permit Renewal Application. CWMI should therefore be able to reduce the Closure Cost Estimate to reflect the completed closure work.

Page 37:

Part V, section 4(D) should be deleted.

~~(D) The Permittee shall comply with all the terms of the September 5, 2012 Biological Opinion (81420-2012-F-0044-2) issued by the U.S. Fish and Wildlife Service to the United States Environmental Protection Agency for the Chemical Waste Management Kettleman Hills Facility, including without limitation, the Reasonable and Prudent Measures, Terms and Conditions and Reporting Requirements of the Incidental Take Statement included in the Biological Opinion.~~

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Comment:

KHF is already separately required to comply with the Reasonable and Prudent Measures, Terms and Conditions and Reporting Requirements of the Incidental Take Statement by the Biological Opinion (BO). As such, the conditions set forth in this provision are not under DTSC's jurisdiction and tying the BO requirements to the HWFP could create issues in the future if any changes are made to the BO which, as a result, would require revisions in the HWFP. CWMI therefore requests that DTSC strike this condition.

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Page 37:

Part V, section 5(A) states:

5. Response to and reporting of spills, leaks or releases of hazardous waste
 - (A) The Permittee shall comply with California Code of Regulations, title 22, section 66264.175(b)(5) in response to any spill or leak of hazardous waste or accumulated precipitation within the containment system in the container transfer or storage areas.

Comment:

As with all the applicable Title 22 regulations, CWMI will continue to comply with Section 66264.175(b)(5) as referenced in the condition. That section requires spilled or leaked waste and accumulated precipitation to be removed from the sump or collection area in as timely a manner as necessary to prevent overflow of the collection system and, if the collected material is a hazardous waste under chapter 11, to manage it as a hazardous waste in accordance with all applicable requirements of chapters 12 through 16 of the same division.

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It is unclear what additional actions, over and above those required by the cited regulatory section, if any, DTSC intends to require of CWMI through inclusion of the above permit condition. Please clarify the intent behind this condition.

Page 37:

Part V, section 5(B) should be revised as follows:

- (B) As part of the contingency plan, The Permittee shall comply with California Code of Regulations, title 22, section 66264.196(b) in response to any tank spills or leakage of hazardous waste ~~or accumulated precipitation within~~ from a tank system or its secondary containment.

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Comment:

Section 66264.196 does not refer to accumulated precipitation. Accumulated precipitation for tank systems is discussed in 66264.193 (Containment and Detection of Releases). It should therefore be deleted from this condition.

Section 66264.196, subsection (b), sets forth the steps an owner or operator must take if a tank system or secondary containment system results in a leak or spill, or becomes unfit for use, including removal from service. It is unclear what additional steps, if any, DTSC would expect of CWMI by including this condition. Please clarify.

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Furthermore, CWMI requests clarification on whether the exemption for notification and reporting of leaks or spills that are "less than or equal to a quantity of one (1) pound," and which is immediately contained and cleaned up, as described in section 66264.196, subdivision (b)(5)(B)(1)-(2), is still applicable? CWMI assumes these regulatory provisions apply. If DTSC disagrees please explain the reasons why.

Page 38:

Part V, section 5(C)(1) should be revised as follows:

- (C) For any spill or leak of hazardous waste not covered by subsection (A) or (B) above, the Permittee shall comply with the following requirements:
 - (1) The Permittee shall commence removal of the spilled or leaked hazardous waste at the Facility from, and shall cleaning of, the affected surface within eight hours of discovery of the spill or leak, regardless of whether such a spill or leak required the Permittee to implement its contingency plan or any emergency procedures, or whether the hazardous waste is released into the environment as result of the spill or leak.

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Comment:

For certain events it may not be physically possible to remove the spill and clean the affected surface within eight hours of discovery. KHF will, however, commence removal and cleaning within eight hours of discovery if not earlier.

Page 38:

Part V, section 5(C)(2) should be revised as follows:

- (C) For any spill or leak of hazardous waste not covered by subsection (A) or (B) above, the Permittee shall comply with the following requirements . . .

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(2) Except as provided below, ~~T~~the Permittee shall record any spill or leak of hazardous waste at the Facility and steps taken to address it, regardless of whether such a spill or leak requires the Permittee to implement its contingency plan or any emergency procedures, or whether the hazardous waste is released into the environment as a result of the spill or leak and shall make the operating record available for review upon DTSC's request. Notwithstanding this condition, the Permittee shall not be required to report the following spills and leaks to DTSC: (1) Spills and leaks of hazardous waste ~~or hazardous constituents~~ that occur and are fully contained within a permitted secondary containment area; (2) Incidental leakage of vehicle fluids such as engine oil, antifreeze, hydraulic oil, gear oil, and fuel associated with vehicles operating within the Facility; or (3) Spills or leaks of municipal solid waste (Class III), non-waste material (i.e. products) or designated waste (Class II) that do not meet a reportable quantity.

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Comment:

As drafted, the recording requirement above is overly broad and conflicts with existing spill reporting regulations and the terms of the settlement agreement entered into in March 2013. CWMI therefore requests the above language be included for point of clarification for the same reasons explained below regarding Part V, section 5(D).

Furthermore, CWMI requests clarification on whether the exemption for notification and reporting of leaks or spills that are "less than or equal to a quantity of one (1) pound," and which is immediately contained and cleaned up, as described in section 66264.196, subdivision (b)(5)(B)(1)-(2), is still applicable despite this condition?

Page 38:

Part V, section 5(D) should be revised as follows:

In the event the Permittee discovers a release or a threat of a release of hazardous waste that Permittee reasonably believes poses or constituents, or identifies an immediate or potential threat to human health or the environment, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of discovery summarizing the findings, including the immediacy and magnitude of any potential threat to human health or the environment. If a written report is required, ~~T~~the written summary of the findings shall include but not be limited to an identification of the material, the amount released, the location of the release, a description of how the release occurred, how practices will be adjusted to prevent future similar releases (if applicable to CWMI operations), the name of the person responsible for the cleanup, photo documentation of the location, and an evaluation of the potential for threat to

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~~human health or the environment, if any. For the purpose of Section V.5.(D), the term “constituent” means: (a) a constituent identified in Appendix VIII to chapter 11 of division 4.5 of title 22 of California Code of Regulations which is a component of a hazardous waste or leachate and which has a physical or chemical property that causes the waste or leachate to be identified as hazardous waste; or (b) any other element, chemical compound, or mixture of compounds which is a component of a hazardous waste or leachate and which has a physical or chemical property that causes the waste or leachate to be identified as a hazardous waste. Notwithstanding this condition, the Permittee shall not be required to report spills and leaks of hazardous waste that occur and are fully contained within a permitted secondary containment area.~~

Comment A

CWMI is concerned that certain parts of the spill reporting requirements contain language that could lead to reasonable differences in their interpretation. CWMI would like to avoid such potential problems in the future. CWMI believes that because the Permit imposes requirements that are different from existing applicable state and federal regulations, it is important that the spill reporting requirements be clearly delineated.

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For example, the new condition lacks any thresholds identified for the size or quantity of a reportable release - meaning any release, no matter how small, of a hazardous waste must be reported as set forth by the draft condition. Conversely, as the Department is aware, section 66264.196 of Title 22 of the CCR provides such guidance in the form of reporting thresholds. That section requires 24-hour reporting of any release to the environment for tank spills or leakage, except, as provided in subsection (b)(5)(B), if the spill is less than 1 pound and immediately contained and cleaned up. CWMI requests confirmation that the exemption for notification and reporting of leaks or spills that are “less than or equal to a quantity of one (1) pound,” and which is immediately contained and cleaned up, as described in section 66264.196, subdivision (b)(5)(B)(1)-(2), is still applicable despite this condition. Likewise, the reportable quantity determinations under 40 CFR Part 302 provide clear standards for CWMI to determine whether a particular spill must be reported. CWMI requests confirmation that these requirements can be relied upon for permit compliance.

EPA has recognized the fundamental importance of providing clear understanding of reporting requirements as part of an effective permitting program, stating: “EPA believes that the most useful purpose of a permit is to specifically prescribe the requirements that a facility has to meet to allow that facility to plan and operate with knowledge of what rules apply.” (See EPA, RCRA Orientation Manual, Section III at p.111 (2011).) CWMI agrees with EPA’s statement and believes that this fundamental principle – clarity and specificity – applies to all permits, whether federal or state, environmental or otherwise.

CWMI therefore requests that the draft condition be revised to include language found in existing statute and regulation triggering reporting upon a “reasonable belief” that a

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release or threatened release poses a significant or potential hazard to human health or the environment. (See, e.g. Cal. Code Regs., tit.19, § 2703, subd. (c); Health & Saf. Code §§ 25507, 25501, subd. (p) [reporting required for spills of “hazardous material” based on the handler’s “reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment”].)

If DTSC does not revise the condition to include language providing for a “reasonable belief” or “reasonable basis” as noted above, CWMI requests clarification from DTSC as to what, in DTSC’s view, is a “threat of a release” or a “potential threat to human health or the environment” triggering the need for reporting. CWMI’s proposed revisions are designed to avoid such ambiguity.

In the same spirit of avoiding redundancy and unwarranted confusion of reporting requirements, the phrase “or constituents” should be removed from the draft condition because the DTSC’s proposed definition of “constituent” for spill reporting is dependent upon substance identification “as a hazardous waste.” As hazardous waste is already identified as the trigger for reporting pursuant to this provision, there is no need for the term “constituent.”

The Permit should also be clarified to specify that leaks of hazardous waste within a containment area are not subject to the reporting requirements. CWMI has proposed language as noted above that would clarify this point.

Lastly, CWMI proposes that DTSC consider revising the spill reporting requirements to reflect that they are intended to be wholly consistent with federal and DTSC regulations. This would involve deleting the current spill reporting language and replacing it with language that specifically references existing federal and state statutes and regulations addressing spill and release reporting from KHF. Specifically, the permit should identify the following spill reporting requirements and not impose other reporting requirements that are not found in applicable statutes or regulations:

Federal Requirement	California Requirement	Description
40 CFR § 264.56	22 CCR § 66264.56	Reporting required for releases which could threaten human health, or the environment, outside the facility.
40 CFR § 270.30	22 CCR 66270.30(l)(6)(A)	Reporting required for releases of hazardous waste that (1) may cause an endangerment to public drinking water supplies, or (2) which could threaten the environment or human health outside the facility.
	H&SC § 25507(a) 19 CCR § 2703	Reporting required for any release or threatened release of a hazardous material, which because of

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Federal Requirement	California Requirement	Description
		its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment.
40 CFR § 264.196	22 CCR § 66264.196	Reporting required for a release of a hazardous waste from a tank system or secondary containment system to the environment.
40 CFR § 302.6		Reporting required for releases of reportable quantities of hazardous substances listed under 40 CFR Table 302.4.
40 CFR § 761.125		Reporting required for certain spills of PCBs

Comment B

Alternatively, if DTSC disagrees with removing the Permit’s reference to “constituents” in this Section, then CWMI proposes the following revisions to **Part V, section 5(D)** as follows:

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In the event the Permittee discovers a release or a threat of a release of hazardous waste or constituents ~~that the Permittee reasonably believes poses or identifies~~ an immediate or potential threat to human health or the environment, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of discovery, ~~summarizing the findings, including the immediacy and magnitude of any potential threat to human health or the environment. If a written report is required,~~ the written summary of the findings shall include but not be limited to an identification of the material, the amount released, the location of the release, a description of how the release occurred, how practices will be adjusted to prevent future similar releases (if applicable to CWMI operations), ~~the name of the person responsible for the cleanup,~~ photo documentation of the location, and an evaluation of the potential for threat to human health or the environment, ~~if any~~. For the purpose of Section V.5.(D), the term “constituent” means: (a) a constituent identified in Appendix VIII to chapter 11 of division 4.5 of title 22 of California Code of Regulations which is a component of a hazardous waste or leachate and which has a physical or chemical property that causes the waste or leachate to be identified as hazardous waste; or (b) any other element, chemical compound, or mixture of compounds which is a component of a hazardous waste or leachate and which has a physical or chemical property that causes the waste or leachate to be identified as a hazardous waste.

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Notwithstanding this condition, the Permittee shall not be required to report the following spills and leaks to DTSC:

1. Spills and leaks of hazardous waste or hazardous constituents that occur and are fully contained within a permitted secondary containment area.
2. Incidental leakage of vehicle fluids such as engine oil, antifreeze, hydraulic oil, gear oil, and fuel associated with vehicles operating within the Facility.
3. Spills or leaks of municipal solid waste (Class III), non-waste material (i.e. products) or designated waste (Class II) that do not meet a reportable quantity.

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This suggested revised version of the draft condition incorporates the comments made above and language within the Stipulation entered into by CWMI and DTSC regarding spills or leaks that do not give rise to reporting requirements. (See “Stipulation for Settlement and Entry of Consent Judgment and Permanent Injunction” (March 18, 2013, Los Angeles Superior Court Case No. BC503093) (“Stipulation”) [Attachment B].) To provide clarity, it is important for the Permit to identify those spills or leaks that do not require reporting. DTSC has previously articulated such situations in the Stipulation. That language is included above. The suggested additions are necessary to provide consistency in reporting and with the Stipulation.

Lastly, to be consistent with the DTSC’s definition of “Constituent” in the draft Permit, we have revised the draft to exclude a third type of spill – municipal solid waste (Class III), non-waste material (products) and designated waste (Class II), which CWMI believes is consistent with DTSC’s intent and must also be included in the Permit condition.

Pages 38-39:

Part V, section 5(E) states:

- (D) The requirements in section (A) through (D) above are in addition to, and do not replace, any other response or reporting requirements or corrective action requirements imposed by applicable laws, regulations, orders, agreements, or this Permit, including the requirements of California Code of Regulations, title 22, section 66264.56 regarding emergency procedures and Health and Safety Code section 25359.4 regarding a release of reportable quantity of hazardous substances.

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Comment:

It is not clear with which “other response or reporting requirements or corrective action requirements imposed by applicable laws, regulations, orders, agreements[,]” CWMI must comply. CWMI requests that DTSC identify all pertinent response, reporting and

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corrective action requirements now as part of this Permit or this response to comment so that future ambiguities in reporting, response and corrective action requirements may be avoided. Specifically, if not already discussed above or referenced in the Draft Permit, please identify any additional regulatory or conditional (response, reporting or corrective action) requirements for which this general catch all provision is intended to capture, if any.

Page 39:

Part V, section 6(A) should be revised as follows:

6. Heavy-duty diesel trucks

- (A) Upon initial placement of waste in Landfill B-18 Phase IIIA and through December 31, 2017, the Permittee shall prohibit entry to the facility of any heavy-duty diesel truck delivering material with a hazardous waste manifest if that truck is equipped with a pre-2007 model year emission equivalent engine. However, the Permittee may allow a heavy-duty diesel truck equipped with a pre-2007 model year emission equivalent engine to enter the facility once, provided that the Permittee shall notify the driver of these requirements, Upon notification to the driver and owner or operator of the entity of these requirements, and that access by that truck and by trucks equipped with a pre-2007 model year emission equivalent engine and owned or operated by the same entity shall thereafter be prohibited, a pre-2007 model year emission equivalent engine may only enter the facility once, after which the non-compliant truck will be prohibited. On or after January 1, 2018, the Permittee shall prohibit entry to the facility of any heavy-duty diesel truck delivering material with a hazardous waste manifest if that truck is equipped with ~~powered by~~ a pre-2010 model year emission equivalent engine.

22

Comment:

In CWMI's discussions with DTSC, it was determined that, because this is a purely voluntary condition, each non-compliant truck would be prohibited from entering the facility after notification of the truck driver and owner/operator - not that all noncompliant trucks from each trucking company would be prohibited from entering after notification to the first truck. (See letter to Brian Johnson, DTSC, from Pete Price (May 29, 2013) [Revised Diesel Emission Reduction Proposal, No. 4, stating "Upon start date, any non-compliant truck will be allowed to enter one time with a notification of the program requirements. Subsequent attempts to enter with a non-compliant truck will be prohibited"].)

The above suggested revisions clarify this point and limit deliveries by non-compliant trucks within the same fleet to once per truck. The suggested clarifications to this condition would prevent a scenario where multiple noncompliant trucks from the same

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company are turned around within the same day when attempting to dispose of contaminated soils from, for example, a short term clean up event.

Page 39:

Part V, section 6(B)(1) should be revised as follows:

- (B) Record keeping and DTSC notification responsibilities of the Permittee.
 - (1) The Permittee shall record the date first allowed access, identity of the trucking company, the Vehicle Identification Number, and engine model year emission standard information for each heavy-duty diesel truck ~~allowed access to the facility~~ and maintain that information on file at the facility for three years.

Comment:

As discussed above, the condition relating to heavy-duty diesel truck engines was a negotiated voluntary condition. As such, the information required by Section V.6 (B)(1) would apply only to the first delivery by a truck with a compliant model year emission equivalent engine. Subsequent deliveries by each truck with a compliant model year emission equivalent engine would not require a record. Furthermore, stickers will be used to cross-reference the truck to a file containing the trucks information. Deliveries to the facility from trucks with compliant engine types will not be separately tracked. CWMI will, however, ensure trucks delivering to the facility meet the intent of this voluntary condition.

Page 39:

Part V, section 6(B)(2), (3) should be revised as follows:

- (2) The Permittee shall notify DTSC in writing within 30 days of allowing access to the facility by any heavy-duty diesel truck equipped with a prohibited model year emission equivalent engine. The notification shall include the date allowed access, identity of the trucking company and the Vehicle Identification Number of the truck.
- (3) The Permittee shall notify DTSC in writing within 30 days of refusing access to the facility by any heavy-duty diesel truck equipped with a prohibited model year emission equivalent engine. The notification shall ~~include~~ reflect the Permittee's best efforts to obtain the date denied access, identity of the trucking company and the Vehicle Identification Number of the truck. If the Permittee is unable to obtain this information, the notice shall state the reasons why such efforts were unsuccessful.

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Comment:

Once a driver is informed that he/she has been denied access to deliver to KHF, CWMI may be unable to obtain all the information required by the above condition. The drivers who access KHF are not employees of KHF, and have no obligation to provide information when requested. We therefore request inclusion of the additional language.

Page 41:

Part VI. CORRECTIVE ACTION should be revised as follows:

1. For those Units undergoing Corrective Action, in the event the Permittee identifies and reasonably believes there to be an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWM's) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery. If a written report is required the report shall summarize—summarizing—the findings under which the Permittee reasonably believes there to be a including the immediacy and magnitude of any potential threat to human health and/or the environment. For the purpose of Section VI.1, the term “constituent” means: (a) a constituent identified in Appendix VIII to chapter 11 of division 4.5 of title 22 of California Code of Regulations which is a component of a hazardous waste or leachate and which has a physical or chemical property that causes the waste or leachate to be identified as a hazardous waste; or (b) any other element, chemical compound, or mixture of compounds which is a component of a hazardous waste or leachate and which has a physical or chemical property that causes the waste or leachate to be identified as a hazardous waste.

Comment:

CWMI urges DTSC to include the above edits to for the same reasons explained in the Comments above regarding Part V, section 5(D) of the Draft Permit at page 38. If DTSC refuses to include the “reasonably believes” language please provide specific examples of what “immediate or potential threats” DTSC would require reporting as part of this condition.

Alternatively, if DTSC refuses to delete the new definition of “constituent” CWMI strongly believes the following additional language must be included so that the condition reads:

Mr. Wayne Lorentzen
 October 25, 2013
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1. For those Units undergoing Corrective Action, in the event the Permittee identifies and reasonably believes there to be an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWM's) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery. If a written report is required the report shall summarize summarizing the findings under which the Permittee reasonably believes there to be a including the immediacy and magnitude of any potential threat to human health and/or the environment. For the purpose of Section VI.1, the term "constituent" means: (a) a constituent identified in Appendix VIII to chapter 11 of division 4.5 of title 22 of California Code of Regulations which is a component of a hazardous waste or leachate and which has a physical or chemical property that causes the waste or leachate to be identified as a hazardous waste; or (b) any other element, chemical compound, or mixture of compounds which is a component of a hazardous waste or leachate and which has a physical or chemical property that causes the waste or leachate to be identified as a hazardous waste.

Notwithstanding this condition, the Permittee shall not be required to report the following spills and leaks to DTSC:

1. Spills and leaks of hazardous waste or hazardous constituents that occur and are fully contained within a permitted secondary containment area.
2. Incidental leakage of vehicle fluids such as engine oil, antifreeze, hydraulic oil, gear oil, and fuel associated with vehicles operating within the Facility.
3. Spills or leaks of municipal solid waste (Class III), non-waste material (i.e. products) or designated waste (Class II) that do not meet a reportable quantity.

The above additional language would confirm CWMI's understanding that notification is required only for release of elements or chemical compounds that are components of hazardous waste or leachate, and which pose a threat to human health or the environment under a reasonable belief standard. Thus, the term "constituent," as defined in the condition, would not apply to spills or releases of non-waste products, Class III MSW or Class II designated waste even if it contained constituents listed in Appendix VIII to chapter 11 of division 4.5 of Title 22. Please confirm in the response to comments whether this understanding is correct.

Alternatively, we urge DTSC to consider referencing the applicable Corrective Action provisions in the Code of Regulations and Health and Safety Code. (See, e.g., Cal. Code Regs. tit. 22, §§ 66264.550 [Applicability of CAMU Regulations], 66264.551 [Grandfathered CAMUs], 66264.552 [CAMU for RCRA Hazardous Waste], 66264.708 [Corrective Action Program].)

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Page 42:

Part VII. PERMIT MODIFICATION HISTORY should be revised as follows:

This modification incorporated a facility initiated Class 3 permit modification application to authorize the following changes in the design of landfill B-18 . . .

- Increase the total capacity of B-18 from 10,700,000 to 15,6700,000 cubic yards,

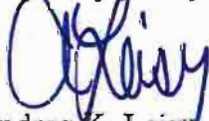
Comment:

As noted above, the requested increase in total capacity at B-18 is up to 15,600,000 cubic yards, not 15,700,000 cubic yards. (See KHF B-18/B-20 Hazardous Waste Disposal Project Draft Subsequent Environmental Impact Report, Revised Project Description and Analysis (May 2008), p. 2-7.)

* * * *

Thank you in advance for your consideration of our client's comments and concerns. We appreciate the opportunity to make suggestions to facilitate the final permit modification process.

Very truly yours,



Andrea K. Leisner

Encl.

24

25

ATTACHMENT A

**[Excerpts re: Partial Closure from the B-19 Bioreactor Draft Subsequent
Environmental Impact Report (Final SEIR certified in 2005).]**

Moisture content is the single most important factor that promotes the accelerated decomposition of waste. With bioreactor technology, there is purposeful control to maintain optimal moisture content at approximately 35 to 65 percent. The moisture, combined with the biological action of naturally occurring microbes, accelerates the rate of decomposition of the waste. A side effect of an anaerobic bioreactor is that it produces landfill gas earlier and at an overall higher rate of generation in the short term than does a traditional dry landfill (EPA 2004). However, landfill gas is generated for a shorter period of time, resulting in long-term air quality improvements compared to a traditional dry landfill.

1.3.6.2 Waste Disposal Activities

Construction of the bioreactor and control units will occur entirely within the existing B-19 landfill, the active Class II/III disposal facility at KHF (see Figure 1-2). For the proposed Project, an area of about 11 acres on the southerly side of B-19 will receive final cover as a hazardous waste unit and will not be utilized for the proposed Project. As a result, the permitted Class II/III airspace of B-19 will be reduced from about 4.4 million cy to about 4.0 million cy. Of this, about 3.0 million cy will compose the bioreactor unit, and about 1.0 million cy will compose the control unit. Because of the greater density of waste in the bioreactor portion of B-19, the proposed Project is estimated to increase the total Class II/III waste capacity of B-19 to about 3.1 million tons. The bioreactor will have a capacity of about 2.4 million tons, and the control unit will have a capacity of about 0.7 million ton.

Under the proposed Project, Class II/III waste disposal would occur from 8:00 a.m. until 6:00 p.m., Monday through Saturday, except on designated holidays (New Year's Day, Memorial Day, Fourth of July, Labor Day, Thanksgiving, and Christmas), and 80 hours per year for special occurrences. Class I disposal operations and other routine onsite operations at other permitted treatment, storage, and disposal units at KHF would not be affected by the proposed Project and would continue 24 hours a day, 7 days a week.

1.4 Environmental Evaluation

1.4.1 Potential Impacts and Mitigation Measures

Anticipated environmental effects of the proposed Project are evaluated in Chapter 3.0. As appropriate, mitigation measures are identified to eliminate or reduce potentially significant impacts. These potential impacts and mitigation measures are summarized for each environmental topic in Table ES-1. The table outlines the major findings and conclusions of the analysis of the proposed Project.

Implementation of mitigation measures is required to make the impact findings included in this Draft SEIR. The potential effects of the proposed Project will be reduced to below a level

Figure 2-1, the bioreactor unit is about 18 acres, and the control unit is about 11 acres. Eleven acres have been removed from the currently approved landfill disposal area and will receive final cover in conformance with regulations governing Class I disposal facilities, as provided in the California Code of Regulations (CCR) Title 22.

The bioreactor will be operated with the addition of liquid waste and high-moisture-content waste, which will increase the rate of waste decomposition as described in Section 2.3.3. The bioreactor will be situated entirely on top of existing Class II/III waste in B-19.

The control unit will be operated using the dry methods typical of most landfills, where efforts are made to minimize stormwater percolation into the waste. The control unit will be situated over the existing Class I disposal area and will be filled with Class II/III waste. Figure 2-3 shows how the Class II/III cover system proposed as part of the Project interfaces with the Class I cover system at B-19. The bioreactor will not affect the integrity of the Class I elements of B-19.

2.3.2 Project Development

Development of the bioreactor and control unit will occur concurrently. Activities generally will be the same as now occur at B-19, and will extend over an estimated period of approximately 3 to 5 years. The primary difference will be the addition of liquids and high-moisture-content waste to the bioreactor portion of B-19.

2.3.2.1 Bioreactor Unit

Development of the bioreactor will occur concurrently with development of the control unit and will involve the following:

- Installation of settlement plates to monitor movement of the waste within the bioreactor
- Construction of a landfill gas control-and-flare system (a single system will function for both the bioreactor and control units)
- Miscellaneous pumps and piping to transport liquid to appropriate locations within the bioreactor

2.3.2.2 Control Unit

Development of the control unit will involve the following:

- Construction of a landfill gas control-and-flare system (a single system will function for both the bioreactor and control units)

- Provide effective wind and water erosion protection
- Prosper in shallow subsoil conditions
- Withstand gas penetration in root zone
- Require minimum irrigation and maintenance
- Minimize fire hazard
- Enhance appearance of the site

Final cover also will be placed over approximately 11 acres in the southerly portion of B-19 that will be closed and not used for the proposed Project. Because this area has received Class I waste, the final cover will be in accordance with CCR Title 22 and Resource Conservation and Recovery Act (RCRA) Subtitle C. From the surface down, this final cover will consist of:

- 30 inches of vegetative soil layer
- Geotextile drainage layer
- 40-mil high-density polyethylene (HDPE) textured geomembrane
- 1 foot of low-permeability foundation soil, compacted to a hydraulic conductivity of less than 1×10^{-5} centimeters per second (cm/sec)

2.4 Waste Handling and Disposal

2.4.1 Components of the Waste Stream

For the proposed Project, the following municipal solid wastes and designated wastes will be permitted for disposal at B-19:

Municipal Solid Wastes

- **General.** Nonhazardous waste as defined in Title 27, Section 20220, consists of putrescible and nonputrescible solid, semisolid and liquid wastes that include garbage, trash, refuse, paper, rubbish, ashes, dewatered sewage sludge, industrial wastes, demolition and construction wastes, abandoned vehicles and parts thereof, discarded home and industrial appliances, manure, and other discarded waste, provided that such wastes do not contain materials that are classified as hazardous wastes in accordance with CCR Title 22.

Dead animals will be accepted and managed in compliance with the requirements defined by the Kings County Division of Environmental Health Services and Title 27, Section 20890.

2.8 Closure, Post-Closure, and Financial Assurance

2.8.1 Closure and Post-Closure Maintenance Plans

Requirements for development and approval of closure and post-closure monitoring and maintenance plans for Class II/III landfills and implementation of these plans are set forth in 40 CFR, Part 258 and CCR Title 27. For the proposed Project, the existing closure and post-closure plans for B-19 will be revised and updated, as necessary, to address the bioreactor. These plans will assure that the B-19 bioreactor unit and control unit will be closed in a manner to protect the public health and environment and will assure that adequate financial resources, as well as post-closure monitoring and maintenance, will be available to accomplish closure.

Preliminary closure and post-closure plans for new or expanded landfills must be submitted with the initial application for a Solid Waste Facility Permit (SWFP). Preliminary revised and updated closure and post-closure plans will be prepared for the B-19 bioreactor unit and control unit and submitted to the LEA, CIWMB, and RWQCB as part of the permitting process. In addition, prior to closure of B-19, final closure and post-closure plans will be submitted to the Department of Toxic Substances Control (DTSC), CIWMB, RWQCB, and LEA for approval.

Requirements for closure plans for Class II/III landfills include, but are not limited to:

- Description of monitoring and control systems
- Description of closure sequence
- Description of methods, procedures and processes to implement closure
- Construction quality assurance proposal
- Slope stability report
- Detailed third-party closure cost estimate
- Detailed schedule for disbursement of closure funds from the financial mechanism

2.8.2 Grading and Final Cover

The proposed final grading plan includes a maximum waste elevation of 945 feet above msl at the center of the top deck, which is sloped at approximately 5 percent. The top deck joins the perimeter side slopes, producing an effective slope of 3:1 with benches. The final grading plan is shown in Figure 2-9.

Proposed final grading and cover plans will be prepared and submitted to the LEA, CIWMB, and RWQCB. As part of closure of B-19, which includes the bioreactor and control

unit, a monolithic or equivalent final cover is proposed, in accordance with CCR Title 27, Section 21090(a). (Additional discussion of final cover is provided in Section 2.3.4.2.)

2.8.3 Monitoring and Maintenance

2.8.3.1 Requirements

Post-closure requirements for Class II/III landfills are set forth in CCR Title 27, requiring landfills to be maintained and monitored after final closure. These requirements include:

- Routine leachate monitoring, collection, and disposal
- Routine groundwater monitoring as required by CCR Title 27
- Routine landfill gas monitoring
- Regular inspection of the site by the LEA to assure compliance with the post-closure monitoring and maintenance plan

A revised post-closure monitoring and maintenance plan for B-19 that includes the proposed Project will be prepared as part of the application for the revised SWFP. At a minimum, the post-closure plan will include the elements discussed above. If, at the end of the regulatory post-closure period (currently a minimum of 30 years), CWMI demonstrates that the B-19 landfill (bioreactor and control unit) poses no threat to public health and safety, or the environment, then post-closure monitoring and maintenance can be terminated, if approved by regulatory agencies.

2.8.3.2 Monitoring and Inspection

2.8.3.2.1 Landfill Gas/Leachate Control System

Landfill gas monitoring probes at the B-19 bioreactor will be monitored during the post-closure period in accordance with CCR Title 27. Surface monitoring will be implemented if necessary to comply with regulations. Gas collection piping and headers will be inspected in accordance with CCR Title 27 and repaired as needed. Inspections will include checking for damaged or leaking pipes, and adequacy of the drainage slope. Gas condensate/leachate quality will be analyzed in accordance with CCR Title 27. The total quantity of gas condensate/leachate pumped from the holding tank will be reported in accordance with CCR Title 27.

2.8.3.2.2 Groundwater Monitoring

Monitoring of the groundwater will continue to be conducted at B-19 during operations, closure, and post-closure. Sampling and analysis will be conducted and reported in accordance with the WDRs and CCR Title 27. The monitoring wells will be inspected for vandalism or damage and, if necessary, repaired in accordance with the WDRs and CCR Title 27.

2.0 PROJECT DESCRIPTION

2.8.3.2.3 Final Cover

The final cover of B-19 will be inspected during the post-closure period in accordance with CCR Title 27. The surface will be inspected for cracks, eroded areas, localized depressions, or other damage. Maintenance, such as filling cracks and depressions, will be completed as necessary.

The vegetative cover at B-19 will be inspected in accordance with CCR Title 27. To reduce the need for irrigation, reseeding will be accomplished, if necessary, just prior to or during the rainy season.

Topographic maps will be prepared in accordance with CCR Title 27 from aerial photographs to compare with surveyed settlement data.

2.8.3.2.4 Drainage Control System

The drainage control system at B-19 will be inspected in accordance with the WDRs and CCR Title 27. Broken pipes or other damage will be repaired as needed. Obstructions to the drainage channels, such as accumulated vegetation or other conditions that could impair the function of the system, will be removed or otherwise mitigated. Channels and berms will be regraded and shaped as necessary.

2.8.4 Closure and Post-Closure Funding

CCR Title 27 requires the operator of a Class II/III landfill to demonstrate the financial ability to pay for closure, and for post-closure monitoring and maintenance. It also requires estimated costs for closure and post-closure monitoring and maintenance to be included in the preliminary closure plan for the landfill. The estimated costs for closure and post-closure are subject to periodic review and revision to assure that funding levels continue to meet projected requirements.

2.9 References and Resources

Chemical Waste Management, Inc. (CWMI). 2000. *B-19 Landfill – Kettleman Hills Facility; Follow-on Traffic Analysis*. Correspondence from R. Henry, CWMI, to W. Zumwalt, Kings County Planning Agency. February 9.

ATTACHMENT B

**[Stipulation for Settlement and Entry of Consent Judgment and Permanent
Injunction (March 18, 2013)
Los Angeles Superior Court Case No. BC503093].]**

1 KAMALA D. HARRIS
 Attorney General of California
 2 MARGARITA PADILLA
 Supervising Deputy Attorney General
 3 OLIVIA W. KARLIN
 Deputy Attorney General
 4 State Bar No. 150432
 300 South Spring Street, Suite 1702
 5 Los Angeles, CA 90013
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 6 Fax: (213) 897-2802
 E-mail: Olivia.Karlin@doj.ca.gov
 7 Attorneys for Plaintiff

Received
 MAR 18 2013
 Filing Window

8
 9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 10 COUNTY OF LOS ANGELES

11 BC503093

12
 13 PEOPLE OF THE STATE OF CALIFORNIA,
 ex rel. Deborah O. Rafael, Director, the
 14 California Department of Toxic Substances
 Control,
 15 Plaintiff,
 16 v.
 17 CHEMICAL WASTE MANAGEMENT,
 INC., DOES 1-20,
 18 Defendants.

Case No.
 STIPULATION FOR SETTLEMENT
 AND ENTRY OF CONSENT
 JUDGMENT AND PERMANENT
 INJUNCTION

(Code of Civil Procedure § 664.6)

19
 20
 21 Plaintiff, People of the State of California, ex rel. Deborah O. Raphael, Director of the
 22 California Department of Toxic Substances Control ("Plaintiff" or the "Department") and
 23 Defendant Chemical Waste Management, Inc. ("Defendant" or "CWM")¹ enter into this
 24 Stipulation for Settlement and Entry of Consent Judgment and Permanent Injunction
 25 ("Stipulation"), and stipulate as follows:

26
 27 ¹ Plaintiff and Defendant also are individually referred to herein as "Party" or
 28 collectively referred to herein as the "Parties."

1 **1. THE COMPLAINT**

2 Concurrently with this Stipulation for Settlement and Entry of Consent Judgment and
3 Permanent Injunction, the Department files a Complaint for Civil Penalties and Injunctive Relief
4 ("Complaint") pursuant to the California Hazardous Waste Control Law, Health and Safety Code
5 section 25100 et seq. ("HWCL") and its implementing regulations against Defendant Chemical
6 Waste Management as an owner and operator of a commercial hazardous waste treatment, storage
7 and disposal facility ("Facility.") The Facility is located at 35251 Old Skyline Road, which is in
8 Kings County, CA, and located north of State Highway 41, and approximately two and a half
9 miles from Interstate Highway 5 ("Facility"). This Stipulation settles the matters alleged in the
10 Complaint.

11 **2. AGREEMENT TO SETTLE DISPUTE**

12 The Parties enter into this Stipulation pursuant to a compromise and settlement of the
13 matters alleged in the Complaint on the terms set forth in this Stipulation and by mutually
14 consenting to the entry by the Superior Court of the County of Los Angeles (the "Court") of the
15 Final Judgment on Consent and Permanent Injunction in the form attached as Exhibit 1 ("Consent
16 Judgment"). The Parties are each represented by counsel. The Office of the Attorney General
17 represents the Department. Akin Gump Strauss Hauer & Feld LLP represents Defendant. This
18 Stipulation and the Consent Judgment were negotiated and executed in good faith and at arms'
19 length by the Parties to avoid expensive and protracted litigation regarding the alleged violations
20 of the HWCL in the Complaint and to further the public interest. Thus, the Parties voluntarily
21 enter into this Stipulation and agree to entry of the Consent Judgment.

22 **3. JURISDICTION AND VENUE**

23 The Parties agree that this Court has subject matter jurisdiction over the matters alleged in
24 the Complaint and personal jurisdiction over Defendant. The Parties stipulate that venue is
25 appropriate in Los Angeles.

26 **4. WAIVER OF HEARING AND TRIAL AND ENTRY OF CONSENT**
27 **JUDGMENT**

28 By signing and entering into this Stipulation, Defendant waives its right to a trial on

1 matters alleged in the Complaint. Further, the Parties request entry of the Consent Judgment on
2 the terms set forth in this Stipulation.

3 **5. APPLICABILITY**

4 Unless otherwise expressly provided herein, the provisions of this Stipulation and the
5 Consent Judgment shall apply to and be binding on Defendant, its subsidiaries and divisions, its
6 parent companies, its officers and directors, its successors and assignees or other entities, acting
7 by, through, under or on behalf of CWM, and the Department and any successor agency of the
8 Department that may have responsibility for and jurisdiction over the subject matter of the
9 Consent Judgment.

10 **6. SETTLEMENT**

11 The Parties enter into this Consent Judgment and Stipulation as a compromise and
12 settlement of disputed claims to avoid the expense of litigation and in furtherance of the public
13 interest. The Parties agree that there has been no adjudication of any fact or law.

14 **7. INJUNCTION**

15 Effective immediately upon entry of the Consent Judgment, Defendant shall comply with
16 the following:

17 A. Defendant shall comply with California Code of Regulations, tit. 22, section
18 66268.40(a)(1), and process and treat hazardous waste in accordance with the treatment standards
19 set forth in the "Treatment Standards for Hazardous Waste" table found in section
20 66268.40(a)(1).

21 B. Defendant shall comply with California Code of Regulations, tit. 22, section
22 66264.72(c) and upon discovering a significant discrepancy in quantity or type of hazardous
23 waste, attempt to reconcile the significant discrepancy in quantity or type of hazardous waste
24 designated on the manifests with the generator or transporter. If CWM is unable to resolve the
25 discrepancy within 15 days after receiving the waste, Defendant shall immediately submit to the
26 Department a letter describing the discrepancy, its attempts to reconcile the discrepancy, and a
27 copy of the manifest or shipping paper at issue. Significant Discrepancy Reports shall be mailed
28 to:

1 DTSC REPORT REPOSITORY
2 GENERATOR INFORMATION SERVICES SECTION
3 P.O. Box 806
4 Sacramento, CA 95812-0806.

5 C. Defendant shall report all new releases of a hazardous waste and/or hazardous
6 constituent to the Department orally within twenty-four (24) hours of discovery and in writing to
7 the Department within ten (10) days of discovery which is required by the 2003 Permit (See 2003
8 Permit, Part VI, paragraph 1, p. 38). The 24-hour oral report and the 10-day written report will be
9 provided by Defendant to both the Department's Permitting Section in Sacramento, located at
10 8800 Cal Center Drive, Sacramento, CA 95826, and to the Department's Enforcement Section in
11 Clovis, located at 1515 Tollhouse Road, Clovis, CA 93611. The Parties agree that the reporting
12 requirements for new releases of hazardous waste and/or hazardous constituents described above
13 and set forth in the 2003 Permit, Part VI., paragraph 1, p. 38, do not require Defendant to report
14 the following spills and leaks to the Department:

- 15 i. Spills and leaks of hazardous waste or hazardous constituents that occur and are
16 fully contained within a permitted secondary containment area.
17 ii. Incidental leakage of vehicle fluids such as engine oil, antifreeze, hydraulic oil,
18 gear oil, and fuel associated with vehicles operating within the Facility.

19 D. Nothing in Sections 7(A), 7(B) or 7(C) of this Stipulation or in any provision of the
20 Consent Judgment entered in this matter is intended, or shall be construed, to limit any of the
21 following:

- 22 i. Defendant's reporting or notification obligations required pursuant to the 2003
23 Permit or the HWCL and its implementing regulations;
24 ii. Defendant's obligations under other provision of the 2003 Permit; and
25 iii. Defendant's rights and obligations with respect to the HWCL, or any
26 environmental laws applicable to the Facility's operations.

27 **8. MONETARY SETTLEMENT REQUIREMENTS**

28 A. Defendant shall pay the Department the sum of \$311,194.00, of which \$291,208.84
is a civil penalty and \$19,985.16 is the Department's costs, within 30 days of the "Effective Date"

1 of the Consent Judgment.

2 B. The sum of \$311,194.00 referenced in paragraph 8A above shall be paid by
3 Defendant to the Department by cashier's check or electronic transfer, payable to "California
4 Department of Toxic Substances Control," and shall bear the following notation: "Chemical
5 Waste Management" and shall be sent to:

6 Cashier
7 Accounting Office, MS-21A
8 Department of Toxic Substances Control
9 P.O. Box 806
10 Sacramento, CA 95812-0806

11 C. An electronic (i.e., Adobe PDF) copy or paper photocopy of all checks and payments
12 made pursuant to the Consent Judgment shall be sent, at the same time, to:

13 Paul Kewin, Assistant Deputy Director
14 Enforcement and Emergency Response Program
15 Department of Toxic Substances Control
16 1001 I Street, MS 11-A
17 P.O. Box 806
18 Sacramento, CA 95812-0806
19 Paul.kewin@dtsc.ca.gov

20 Christopher Cho, Staff Counsel
21 Office of Legal Counsel, MS-23A
22 Department of Toxic Substances Control
23 1001 I Street
24 P.O. Box 806
25 Sacramento, CA 95812-0806
26 Christopher.cho@dtsc.ca.gov

27 **9. LATE PAYMENTS**

28 In addition to the payments due to the Department pursuant to the provisions of Paragraph
8 above, Defendant shall be liable for a stipulated late payment penalty of \$2,500.00 for each of
the first seven calendar days that the payment required pursuant to Paragraph 8 is late. Beginning
on the eighth day that the payment is late, Defendant shall be liable for a stipulated late payment
penalty of \$5,000 per day for each additional day the required payment is late.

10. NOTICE

All submissions and notices required by this Stipulation and the Consent Judgment shall

1 be in writing, and shall be sent to:

2 For the Plaintiff:

3 Paul Kewin, Assistant Deputy Director
4 Enforcement and Emergency Response Program
5 Department of Toxic Substances Control
6 1001 I Street, MS 11-A
7 P.O. Box 806
8 Sacramento, CA 95812-0806

9 and

10 Christopher Cho, Staff Counsel
11 Office of Legal Counsel
12 Department of Toxic Substances Control
13 1001 I Street, MS-23A
14 P.O. Box 806
15 Sacramento, CA 95812-0806

16 For Defendant:

17 Larry W. Metter, Vice President
18 Chemical Waste Management, Inc.
19 9801 Tujunga Avenue
20 Sun Valley, CA 91352

21 and

22 Jim Wetwiska
23 Akin Gump Stauss Hauer & Feld LLP
24 1111 Louisiana Street 44th Floor
25 Houston, TX 77002

26 All approvals and decisions regarding any matter requiring approvals or decisions
27 under the terms of this Stipulation and the Consent Judgment shall be communicated in writing.
28 Each Party may change its respective representative(s) for purposes of notice by providing the
name and address of the new representative, in writing, to all Parties. Any such change will take
effect within seven calendar days of the date of the written notice.

29 **11. AUTHORITY TO ENTER STIPULATION**

30 Each signatory to this Stipulation certifies that he or she is fully authorized by the Party he

1 or she represents to enter into this Stipulation, to execute it on behalf of the party represented, and
2 to legally bind that party.

3 **12. NO WAIVER OF RIGHT TO ENFORCE**

4 The failure of the Department to enforce any provision of the Stipulation or Consent
5 Judgment shall neither be deemed a waiver of such provision, nor in any way affect the validity
6 of the Consent Judgment or the Department's enforcement authority. The failure of the
7 Department to enforce any such provision of this Stipulation or the Consent Judgment shall not
8 preclude it from later enforcing the same or other provisions. No oral advice, guidance,
9 suggestions, or comments by employees or officials of the Department or Defendant, or people or
10 entities acting on behalf of Defendant, regarding matters covered in this Stipulation or the
11 Consent Judgment, shall be construed to relieve Defendant of its obligations under this
12 Stipulation or the Consent Judgment.

13 **13. NO LIABILITY OF THE DEPARTMENT**

14 The Department shall not be liable for any injury or damage to persons or property
15 resulting from acts or omissions by Defendant, its officers, directors, employees, agents,
16 representatives, or contractors, in carrying out activities pursuant to this Stipulation or the
17 Consent Judgment, nor shall the Department be held as a party to or guarantor of any contract
18 entered into by Defendant, its officers, directors, employees, agents, representatives, or
19 contractors, in carrying out the requirements of this Stipulation or the Consent Judgment.

20 **14. FUTURE REGULATORY CHANGES**

21 Nothing in this Stipulation or the Consent Judgment shall excuse Defendant from meeting
22 any new or more stringent requirements that may be imposed by applicable law or by changes in
23 the applicable law. To the extent future statutory and regulatory changes make Defendant's
24 obligations less stringent than those provided for in this Stipulation or the Consent Judgment,
25 Defendant may apply to this Court by noticed motion to modify the obligations contained herein.

26 **15. INTEGRATION**

27 This Stipulation and the Consent Judgment constitute the entire agreement between the
28 Parties regarding the Complaint filed in this court, and may not be amended or supplemented

1 except as provided for in this Stipulation or in the Consent Judgment. No oral representations
2 have been made or relied on other than as expressly set forth herein.

3 **16. RETENTION OF JURISDICTION**

4 The Parties agree that the Court has continuing jurisdiction to interpret and enforce the
5 provisions of this Stipulation and the Consent Judgment.

6 **17. EQUAL AUTHORSHIP**

7 This Stipulation and the Consent Judgment shall be deemed to have been drafted equally
8 by all Parties hereto. The Parties agree that the rule of construction holding that ambiguity is
9 construed against the drafting party shall not apply to the interpretation of this Stipulation or the
10 Consent Judgment.

11 **18. AMENDMENTS TO THIS STIPULATION AND THE CONSENT
12 JUDGMENT**

13 This Stipulation and the Consent Judgment may only be amended pursuant to a written
14 agreement signed by all the Parties, followed by written approval by the Court; or by order of the
15 Court following the filing of a duly noticed motion.

16 **19. COUNTERPARTS**

17 This Stipulation may be executed in several counterpart originals, all of which taken
18 together shall constitute an integrated document.

19 **20. ENTRY OF CONSENT JUDGMENT PURSUANT TO STIPULATION**

20 The Parties further stipulate that upon approval of this Stipulation by the Court, the Court
21 shall enter the Consent Judgment in this matter in the form set forth in the attached Exhibit 1.
22 The "Effective Date" of the Consent Judgment is the date the Consent Judgment is entered by the
23 Court. If the Court does not approve this Stipulation and the Consent Judgment in the form and
24 substance proposed in Exhibit 1 hereto, each Party reserves the right to withdraw both the
25 Stipulation and the Consent Judgment upon written notice to all Parties and the Court.
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IT IS SO STIPULATED.


Dated: February ____, 2013

For the Department of Toxic Substances Control

Brian Johnson, Deputy Director
Enforcement and Emergency Response Program
Department of Toxic Substances Control

Dated: ^{March} ~~February~~ 11, 2013

For Defendant Chemical Waste Management, Inc.:


Larry W. Metter, Vice President

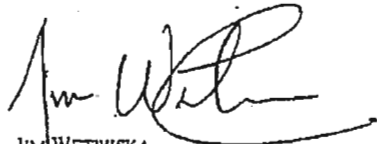
APPROVED AS TO FORM:

Dated: February ____, 2013

KAMALA D. HARRIS
Attorney General of California
Margarita Padilla
Supervising Deputy Attorney General

OLIVIA W. KARLIN
Deputy Attorney General
Attorneys for Plaintiff

Dated: ^{March} ~~February~~ 12, 2013

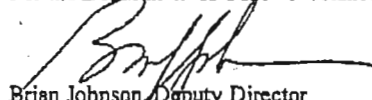

JIM WETWISKA
AKIN GUMP STAUSS HAUER & FIELD LLP
ATTORNEYS FOR DEFENDANT

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IT IS SO STIPULATED.

Dated: ~~February~~ ^{MARCH} 14, 2013

For the Department of Toxic Substances Control


Brian Johnson, Deputy Director
Enforcement and Emergency Response Program
Department of Toxic Substances Control

Dated: February _____, 2013

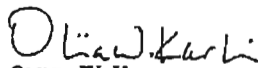
For Defendant Chemical Waste Management, Inc.:

Larry W. Metter, Vice President

APPROVED AS TO FORM:

Dated: ~~February~~ ^{March} 15, 2013

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Dated: February _____, 2013

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Andrea K. Leisy
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October 25, 2013

VIA ELECTRONIC & REGULAR MAIL

Wayne.lorentzen@dtsc.ca.gov

Wayne Lorentzen
Project Manager
California Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

Re: Draft Hazardous Waste Facility Permit Class 3 Modification for the
Chemical Waste Management, Inc., Kettleman Hills Facility (EPA
Identification No: CAT000646117) - Valley Fever

Dear Mr. Lorentzen:

On behalf of our client Chemical Waste Management, Inc. ("CWMI"), we submit the following comments in response comments presented at the September 18, 2013 public hearing on the Draft Hazardous Waste Facility Permit modification for the Kettleman Hills Facility ("KHF") ("Draft Permit" or "HWFP").

At the public hearing, Ingrid Brostrom of CRPE and Maricela Mares-Alatorre suggested DTSC should consider the effect of the Kettleman Hills Facility B-18 Hazardous Waste Disposal Landfill Expansion Project ("KHF Expansion Project") on the incidence of Valley Fever in Kings County.

Such information, however, does not trigger the need for including additional analysis, under CEQA. The Final Subsequent Environmental Impact Report ("Final SEIR") prepared for the KHF Expansion Project was certified by the Kings County Board of Supervisors, as the lead agency. (Cal. Code Regs., tit. 14, § 15164 ("CEQA Guidelines").) DTSC is acting as a responsible agency under CEQA for purposes of the permit modification. (CEQA Guidelines, §§ 15096, 15381.) A responsible agency is bound by the EIR prepared by the lead agency unless it finds that one of the events in CEQA Guidelines section 15162, subdivision (a) triggering the need for a subsequent or supplemental EIR has occurred after the lead agency's decision on the project. (CEQA Guidelines, § 15162, subd. (c).) As such, once an EIR has been certified for a project, no subsequent EIR is required under CEQA unless, based on substantial evidence:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

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2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete . . . shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous EIR;
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(CEQA Guidelines, § 15162, subd. (a); Pub. Resources Code, § 21166.)

Under Public Resources code section 21166, agencies are *prohibited* from requiring further environmental review unless the stated conditions are met. (*Fund for Environmental Defense v. County of Orange* (1988) 204 Cal.App.3d 1538, 1544.) In short, the general principle is that supplemental environmental review should not be required, absent clear circumstances requiring such review.

In this case, the question of whether the KHF Expansion Project may cause or contribute to cases of Valley Fever in Kings County does not qualify as one of the events in CEQA Guidelines section 15162, subdivision (a) triggering the need for additional review.

In particular, such an assertion regarding Valley Fever does not amount to “new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete.” (CEQA Guidelines, § 15162, subd, (a)(3); Pub. Resources Code, § 21166, subd. (c).)

Information regarding Valley Fever in Kings County was available before the SEIR was certified. Coccidioicomycosis, also known as “Valley Fever” based on its being found in large areas of the California Central Valley, is a respiratory disease caused by inhalation of the spores of a naturally growing fungus known as *Coccidioides immitis*. (See Attachment A [Centers for Disease Control and Prevention (“CDC”), “Increase in Reported Coccidioidomycosis — United States, 1998–2011,” Morbidity and Mortality

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Weekly Report (“MMWR”) (March 29, 2013/ Vol. 58 / No. 5.) (CDC, 2013)].) These *Cocci* spores are found in soils in arid areas and are endemic throughout Kings County. (See Attachment B [CDC, “Increase in Coccidioidomycosis — California, 2000–2007,” MMWR (February 13, 2009 / Vol. 58 / No. 5) (CDC, 2009)].) Under certain conditions, soil disturbance (from construction, agricultural activities, and operational activities such as grounds maintenance) combined with wind can cause *Cocci* spores to become airborne and inhaled.¹ (Attachment B.) As such, landfill-related activities at KHF have and, historically, have had the potential for release of *Cocci* spores at the landfill.

Cocci spores and the potential spread of Valley Fever, therefore, are part of the environment that existed in Kings County before and during the preparation and certification of the SEIR. No commenters on the SEIR raised Valley Fever as a potential issue. Such information does not constitute “new information” requiring the preparation of additional CEQA analysis. (See *Citizens for Responsible Equitable Environmental Dev. v. City of San Diego* (2011) 196 Cal.App.4th 515, 532 [information about effect of greenhouse gas emissions on climate change did not require preparation of supplemental EIR, because such information had been available before original EIR had been certified].)

Furthermore, even if such information could be construed as “new information” under Section 15162, subd. (a)(3), such information does not constitute information of “substantial importance” because there is no showing that the KHF Expansion Project “will have one or more significant effects not discussed in the previous EIR.” (CEQA Guidelines, § 15162, subd. (a)(3)(A).) KHF has been in operation for decades and CWMI is unaware of any cases of Valley Fever attributed to its operations. No employee or visitor to KHF has ever reported exposure to Valley Fever from landfill operations.

Because the project under review constitutes a modification of a previously approved project which was subject to prior final environmental review, the project as reviewed in the prior EIR is treated as part of the baseline for the subsequent environmental review. (See *Melom v. City of Madera* (2010) 183 Cal.App.4th 41 [city properly relied on an addendum in analyzing changes to a site plan for a proposed shopping center]; *Fund for Environmental Defense v. County of Orange* (1988) 204 Cal. App. 3d 1538, 1542-1552 [finding no substantial evidence that changed circumstances resulted in the Project causing new significant adverse impacts or a substantial increase in

¹ / It is estimated that the vast majority of people who inhale *Cocci* spores will experience no adverse effects and exhibit no symptoms. (Attachment B.) Others may develop flu-like symptoms such as fatigue, fever, chills, and joint aches that resolve on their own without medication. (*Ibid.*) It is only in approximately 1% of cases that the disease may lead to a severe result. (*Ibid.*) Coccidioidomycosis is not contagious and once an individual has experienced it, whether asymptotically or not, the individual is immune from subsequent infection. (*Ibid.*) Consequently, most people who reside in endemic areas, like Kings County, are considered to have developed immunity to the disease.

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previously identified significant impacts].) The level of operations at KHF has not increased since the SEIR was certified, so any increase in the incidence rate of Valley Fever in California after December 2009 would be due to other factors. According to the CDC, the reasons for the increase in the incidence rate is unclear, but because *Cocci* spores exists in the soil and is sensitive to environmental changes, the CDC surmises that factors such as drought, rainfall, and temperature might have resulted in increased spore dispersal. (Attachment A.) In addition, prison inmates in Avenal and Corcoran account for a majority of the reported cases of Valley Fever in Kings County due to exposure of *Cocci* spores to inmates originating from areas where the disease is not endemic. (Attachment B.)

Improved awareness and reporting of Valley Fever may have also contributed to the appearance of an increase in incidence rate. (Attachment A.) Indeed, it was only in 2007 that the Kings County Department of Public Health began mandating additional requirements for Valley Fever disease reports in order to track and define the effects of the disease in Kings County. Prior to that time, the date of onset was usually missing or inaccurate on the illness reports received. Also, in 2010, California transitioned to a laboratory-based reporting system, which facilitated reporting and, according to the CDC, might account for the increase in reported cases in 2011. (Attachment A.)

Because inhalation of fugitive dust is the primary pathway of exposure to *Cocci* spores, control and suppression of fugitive dust is the primary recognized means of limiting distribution of the spores, where they occur. Specific dust control measures have been adopted at KHF which will continue to prevent any potential release of *Cocci* spores. These measures will continue to be implemented in connection with the proposed KHF expansion project. Existing fugitive dust control measures at KHF meet the requirements of SJVAPCD Regulation VIII, as applicable, and include, but are not limited to, the following:

- Watering active construction/disposal areas
- Watering active unpaved roads
- Watering of daily cover stockpiles and the unpaved roads used to access the daily cover stockpiles
- Track-out controls at the transition of dirt roads to paved roads
- Vehicles and equipment are restricted to specific onsite roads
- Vehicle speed on onsite roads to/from the landfill is limited to 15 miles per hour on paved and unpaved roads.

(See DSEIR, pp. 3.3-16 to 3.3-18; FSEIR, p. 1-26; SJVAPCD Regulation VIII, Rules 8011, 8021, 8041, 8051, 8061, 8071, <http://www.valleyair.org/rules/1ruleslist.htm#reg8>.)

The dust control measures will continue with implementation of the KHF Expansion Project and, in conjunction with Mitigation Measures AQ-MM.1, will assure that airborne particulates are minimized during construction and operation. (DSEIR, pp. 3.3-16 to 3.3-18; FSEIR, p. 1-26; DTSC Addendum to FSEIR (May 21, 2013), pp. 49-

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50.) These efforts will minimize public exposure to dust and so will protect against exposure to *Cocci* spores. As such, there no substantial evidence that “[t]he project will have one or more significant effects not discussed in the previous EIR.” (CEQA Guidelines, § 15162, subd, (a)(3)(A).) No additional analysis of Valley Fever is necessary. (See *Moss v. County of Humboldt* (2008) 162 Cal.App.4th 1041, 1062 [a statement about some level of increased contamination in a creek did not make a showing that there would be a new significant impact, and thus failed to demonstrated the new information was “of substantial importance”].)

* * * *

Thank you in advance for your consideration of our client’s comments.

Very truly yours,

A handwritten signature in black ink, appearing to read "A. Leisy". The signature is written in a cursive, flowing style.

Andrea K. Leisy

Attachment A

Increase in Reported Coccidioidomycosis — United States, 1998–2011

Coccidioidomycosis, also known as valley fever, is an infection caused by inhalation of *Coccidioides* spp. spores. This soil-dwelling fungus is endemic to arid regions of Mexico, Central and South America, and the southwestern United States (1). Symptomatic patients typically experience a self-limited influenza-like illness, but some develop severe or chronic pulmonary disease, and less than 1% of patients experience disseminated disease (1). Coccidioidomycosis can be costly and debilitating, with nearly 75% of patients missing work or school because of their illness, and more than 40% requiring hospitalization (2). Previous publications have reported state-specific increases in coccidioidomycosis in Arizona and California during 1998–2001 and 2000–2007, respectively (3,4). To characterize long-term national trends, CDC analyzed data from the National Notifiable Diseases Surveillance System (NNDSS) for the period 1998–2011. This report describes the results of that analysis, which indicated that the incidence of reported coccidioidomycosis increased substantially during this period, from 5.3 per 100,000 population in the endemic area (Arizona, California, Nevada, New Mexico, and Utah) in 1998 to 42.6 per 100,000 in 2011. Health-care providers should be aware of this increasingly common infection when treating persons with influenza-like illness or pneumonia who live in or have traveled to endemic areas.

In collaboration with the Council of State and Territorial Epidemiologists (CSTE), CDC compiles data on selected diseases through NNDSS. Data are reported to CDC from various state and territorial surveillance systems and reporting mechanisms. Coccidioidomycosis has been nationally notifiable since 1995; however, it was not nationally notifiable in 2010. Although the CSTE case definition includes both laboratory and clinical criteria, Arizona uses a laboratory-only case definition because of its large number of cases and the high predictive value of a positive laboratory result (2); since 2008, the laboratory component of the CSTE definition has included cases with a single positive serologic test. California uses the CSTE case definition, requiring both laboratory and

clinical evidence of infection, but some counties with large numbers of cases use a laboratory-only definition.

State and regional annual incidence rates were calculated by dividing the number of cases by U.S. Census Bureau population estimates for each year. Crude, sex-specific, age-specific, and age-adjusted incidence rates (aIR) were calculated for Arizona, California, and other endemic states where coccidioidomycosis is reportable (Nevada, New Mexico, and Utah, combined). Rates were age adjusted using the 2000 U.S. standard population. Negative binomial regression was performed to assess statistical significance of incidence trends during 1998–2011. This model adjusts for changes in population size and age and sex distribution over time.

During 1998–2011, a total of 111,717 coccidioidomycosis cases were reported to CDC from 28 states and the District of Columbia: 66% from Arizona, 31% from California, 1% from other endemic states, and <1% from nonendemic states. In Arizona, California, Nevada, New Mexico, and Utah combined, the number of cases increased from 2,265 in 1998 (aIR: 5.3 per 100,000 population) to 8,806 in 2006 (18.0 per 100,000); a decrease occurred in 2007 and 2008 before

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an increase in 2009 (12,868 cases; 25.3 per 100,000), which continued into 2010 and 2011 (42.6 per 100,000) (Table 1).

Incidence in endemic states increased among all age groups during 1998–2011 (Figure). During this period, incidence typically was highest among the 40–59 year age group in California but was consistently highest among persons aged ≥ 60 years in Arizona and other endemic states. Incidence during 2011 was 381.1 per 100,000 among persons aged 60–79 years and 385.2 per 100,000 among persons aged ≥ 80 years in Arizona (Table 2).

During 1999–2008, most (56%) Arizona cases occurred among males, but beginning in 2009, a higher proportion (55%) of cases occurred among females. Incidence in 2011 in Arizona was substantially higher among females (286.9 per 100,000) than males (215.7 per 100,000). In contrast, only 35% of California cases occurred among females during 1998–2011, and 2011 incidence among California males (20.5 per 100,000) was more than double that among females (9.7 per 100,000).

The increase in the number of Arizona cases, from 1,474 in 1998 to 16,467 in 2011, was statistically significant by negative binomial regression (aIR: 30.5 per 100,000 in 1998; 247.7 per 100,000 in 2011, $p < 0.001$). Adjusting for changes in population demographics, this corresponds to an increase in coccidioidomycosis incidence of approximately 16% each year during the study period. The number of California cases increased from 719 in 1998 (aIR: 2.1 per 100,000) to 5,697 in 2011 (aIR: 14.9 per 100,000) (average annual increase of

13%, $p < 0.001$). The number of cases reported in Nevada, New Mexico, and Utah combined increased from 72 in 1998 (aIR: 1.4 per 100,000) to 237 in 2011 (aIR: 3.1 per 100,000) ($p < 0.001$). Cases reported in nonendemic states increased from six in 1998 to 240 in 2011.

Reported by

Clarisse A. Tsang, MPH, Arizona Dept of Health Svcs. Farzaneh Tabnak, PhD, Duc J. Vugia, MD, California Dept of Public Health. Kaitlin Benedict, MPH, Tom Chiller, MD, Benjamin J. Park, MD, Div of Foodborne, Waterborne, and Environmental Diseases, CDC. **Corresponding contributor:** Kaitlin Benedict, kbenedict@cdc.gov, 404-639-0387.

Editorial Note

This report describes statistically significant increases in the incidence rate of reported coccidioidomycosis in endemic states during 1998–2011 after adjusting for changes in population size and in age and sex distribution. Although the number of cases decreased in Arizona during 2007–2008 and in California during 2007–2009, incidence dramatically increased in 2010 and 2011. In 2011, coccidioidomycosis was the second most commonly reported nationally notifiable condition in Arizona and the fourth most commonly reported in California (5).

The reasons for the increases described in this report are unclear. *Coccidioides* exists in the soil and is sensitive to environmental changes; factors such as drought, rainfall, and temperature might have resulted in increased spore dispersal,

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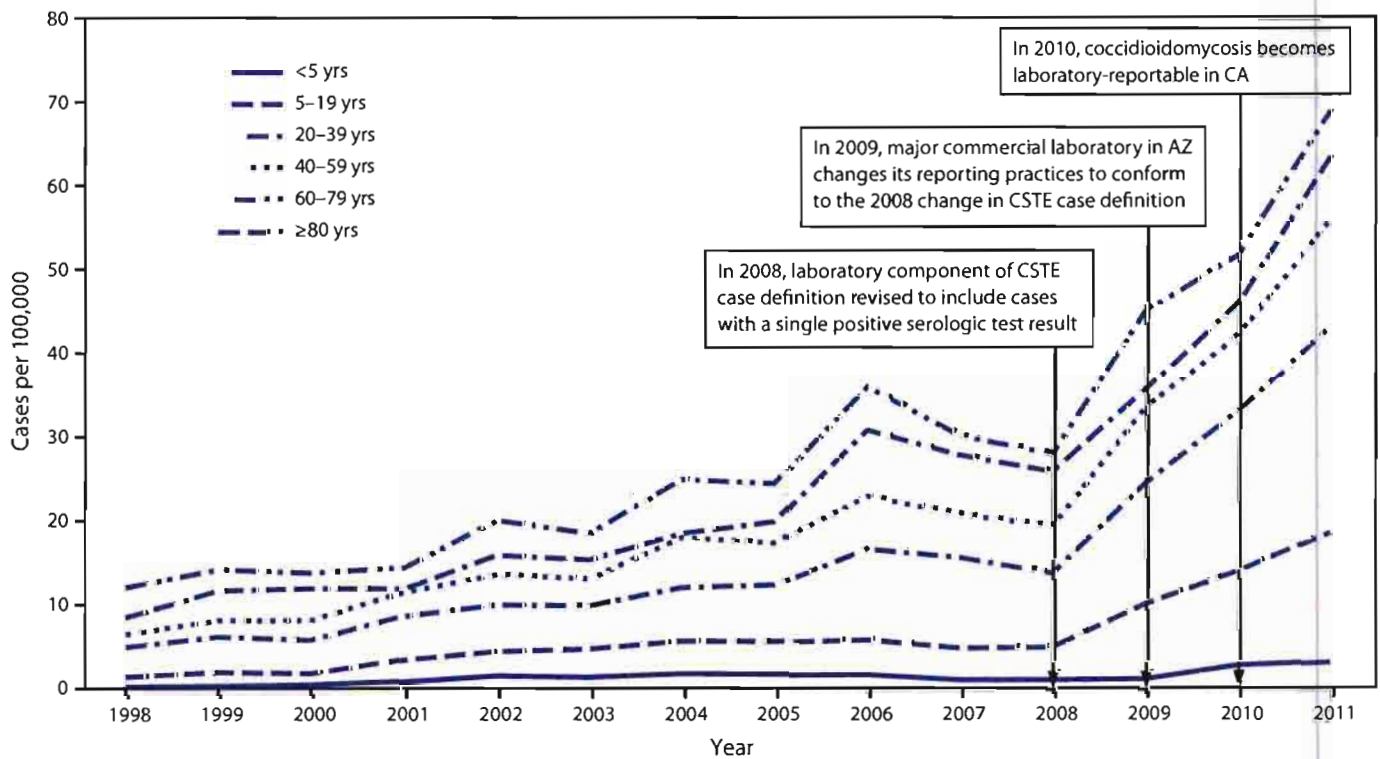
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TABLE 1. Number and age-adjusted incidence per 100,000 population of coccidioidomycosis cases, by region — Arizona, California, Nevada, New Mexico, and Utah, 1998–2011

Year	Arizona		California		Nevada, New Mexico, and Utah		Total endemic area*	
	No.	Incidence	No.	Incidence	No.	Incidence	No.	Incidence
1998	1,474	30.5	719	2.1	72	1.4	2,265	5.3
1999	1,812	37.6	939	2.8	55	0.9	2,806	6.6
2000	1,917	36.6	840	2.5	67	1.1	2,824	6.4
2001	2,301	43.1	1,538	4.4	63	1.0	3,902	8.6
2002	3,133	57.2	1,727	4.9	63	1.0	4,923	10.7
2003	2,695	47.8	2,091	5.9	55	0.9	4,841	10.4
2004	3,667	62.9	2,641	7.4	110	1.5	6,418	13.5
2005	3,516	58.3	2,885	7.8	108	1.7	6,509	13.4
2006	5,535	88.6	3,131	8.6	140	2.1	8,806	18.0
2007	4,832	75.0	2,991	8.1	163	2.4	7,986	16.0
2008	4,768	72.5	2,597	7.0	99	1.4	7,464	14.8
2009	10,233	154.4	2,488	6.7	147	2.1	12,868	25.3
2010	11,883	182.0	4,622	12.2	159	2.1	16,664	32.2
2011	16,467	247.7	5,697	14.9	237	3.1	22,401	42.6

* Coccidioidomycosis is endemic but not reportable in Texas.

FIGURE. Coccidioidomycosis incidence per 100,000 population, by age group — Arizona, California, Nevada, New Mexico, and Utah, 1998–2011



Abbreviations: CSTE = Council of State and Territorial Epidemiologists; AZ = Arizona; CA = California.

and disruption of soil by human activity, such as construction, also might be a contributing factor.

Changes in surveillance methodology might have resulted in artifactual increases. California transitioned to a laboratory-based reporting system during 2010, which facilitated reporting and might account for the increase in reported

cases in 2011. However, some highly endemic counties, such as Kern County, already had been using laboratory-based systems, so this cannot fully explain the recent increase. The observed increase in Arizona might be partially attributable to a 2009 change by a major commercial laboratory to conform its reporting practices to the 2008 CSTE case definition,

TABLE 2. Number and incidence per 100,000 population of coccidioidomycosis cases, by region, age group, and sex — Arizona, California, Nevada, New Mexico, and Utah, 2011

Area and age group (yrs)	Male		Female		Total*	
	No.	Incidence	No.	Incidence	No.	Incidence
Arizona						
<5	38	16.5	25	11.3	63	14.0
5–19	621	89.4	796	120.3	1,428	105.3
20–39	1,671	187.1	2,707	319.4	4,422	254.1
40–59	2,239	276.4	3,223	386.5	5,509	335.1
60–79	1,919	382.4	2,078	372.8	4,037	381.1
≥80	424	445.4	461	334.8	897	385.2
All ages	6,954	215.7	9,349	286.9	16,467	254.0
California						
<5	35	2.7	22	1.8	57	2.2
5–19	340	8.5	263	6.9	605	7.7
20–39	1,329	24.0	561	10.6	1,897	17.6
40–59	1,513	30.0	583	11.4	2,098	20.6
60–79	509	21.4	337	12.4	848	16.7
≥80	88	18.5	75	9.8	163	13.1
All ages	3,839	20.5	1,844	9.7	5,697	15.1
Nevada, New Mexico, and Utah						
<5	0	0.0	0	0.0	0	0.0
5–19	8	0.9	5	0.6	13	0.8
20–39	15	1.4	17	1.7	32	1.5
40–59	49	5.2	29	3.0	77	4.1
60–79	62	12.2	38	7.2	100	9.6
≥80	10	11.6	4	3.2	14	6.6
All ages	143	3.8	93	2.5	237	3.1
Total endemic area†						
<5	73	4.0	47	2.7	120	3.3
5–19	969	17.4	1,064	20.0	2,046	18.8
20–39	3,015	40.1	3,286	45.8	6,352	43.2
40–59	3,801	55.8	3,834	55.5	7,684	56.0
60–79	2,491	73.4	2,455	90.2	4,988	69.1
≥80	522	79.4	540	52.3	1,074	63.6
All ages	10,398	40.3	11,288	43.4	22,401	43.2

* Categories might not sum to totals because of missing age and sex data.
 † Coccidioidomycosis is endemic but not reportable in Texas.

whereby positive enzyme immunoassay (EIA) results were reported as cases without confirmation by immunodiffusion. One commercially available EIA test (Meridian Bioscience) commonly used to diagnose coccidioidomycosis has been described to have false-positive results in some instances (6), but the contribution of this phenomenon, if any, to the overall increase in cases is unknown.

Improved awareness of coccidioidomycosis might have resulted in increased diagnostic testing (and thus reporting) in endemic and nonendemic states. *Coccidioides* has been found to be the etiologic agent in an estimated 15%–29% of community-acquired pneumonias in highly endemic areas (7). However, a 2006 study demonstrated that only a small proportion (2%–13%) of patients with compatible illness in an endemic area were tested for coccidioidomycosis (7), suggesting that the disease is greatly underreported. Further study is needed to understand if testing practices have changed. Despite the increase in reported cases, overall U.S. coccidioidomycosis

What is already known on this topic?

Coccidioidomycosis is an infection that results from inhalation of *Coccidioides* spp. fungal spores. It is endemic in the southwestern United States, with the highest number of cases occurring in Arizona and California, and constitutes a substantial public health burden in these areas, particularly among older persons.

What is added by this report?

Reported coccidioidomycosis cases have increased dramatically in recent years. The age-adjusted incidence was 5.3 cases per 100,000 population in the endemic area in 1998 and 42.6 per 100,000 in 2011. Among persons aged 60–79 years in the endemic area, incidence was 69.1 cases per 100,000 in 2011.

What are the implications for public health practice?

The number of reported cases of coccidioidomycosis is increasing. Health-care providers should be alert for this infection among persons with influenza-like illnesses who live in or have traveled to endemic areas. Further research on strategies to reduce the morbidity of coccidioidomycosis is needed.

mortality rates have remained fairly stable at approximately 0.6 per 1 million person-years during 1990–2008 (8).

The findings in this report are subject to at least four limitations. First, NNDSS data might underrepresent the actual burden of disease because coccidioidomycosis is not reportable in every state, even in known endemic areas such as Texas, and because state reporting of cases to CDC is voluntary. In particular, the number of cases reported in 2010 might underestimate the actual number of infections because coccidioidomycosis was not notifiable in 2010 (but became notifiable again in 2011). Second, minor discrepancies between the findings in this report and those presented in *MMWR's* annual *Summary of Notifiable Diseases* reports likely exist because the summary does not include cases from states where the disease was not reportable. Third, minor discrepancies might exist between this report and state-specific reports because of delays in case reporting. Finally, because nearly 70% of cases were missing race/ethnicity data, incidence rates by race and ethnicity were not calculated. This is an important consideration because high rates among Asians and blacks have been documented previously, and black race has been shown to be an independent risk factor for disseminated coccidioidomycosis (9).

Further investigation is needed to determine how much of the observed increase in coccidioidomycosis incidence is artifactual. Nevertheless, health-care providers should be alert for coccidioidomycosis among patients of all ages who live in or have traveled to endemic areas. Persons in endemic areas should consider trying to reduce exposure to dusty air, which might contain *Coccidioides* spp. spores. However, because there are currently no proven preventive measures

for coccidioidomycosis, additional research into strategies that reduce the incidence or morbidity of this infection is warranted. Specifically, the role of antifungal treatment for primary pulmonary disease remains controversial and deserves further exploration (10), although treatment is recommended in certain patient groups, particularly those at high risk for severe disease (1). Because the symptoms of coccidioidomycosis mimic those of other community-acquired respiratory illnesses, patients often experience delays in testing and diagnosis and receive unnecessary antibiotics; however, patients who know about coccidioidomycosis are more likely to request testing and receive a diagnosis sooner than those who are not familiar with the disease (2). Therefore, promoting increased community and health-care provider awareness of this infection continues to be an important role for public health officials.

Acknowledgments

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Attachment B



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Increase in Coccidioidomycosis – California, 2000–2007

Coccidioidomycosis is an infection resulting from inhalation of airborne spores of *Coccidioides immitis* or *Coccidioides posadasii*, soil-dwelling fungi endemic to California's San Joaquin Valley; southern regions of Arizona, Utah, Nevada, and New Mexico; western Texas; and regions of Mexico and Central and South America (1). Of an estimated 150,000 new infections annually in the United States (2), approximately 60% are asymptomatic (1). Patients with symptoms usually experience a self-limited influenza-like illness (ILI), although some develop severe pneumonia. Fewer than 1% of patients develop disseminated disease. Infection usually produces immunity to reinfection. During 1995–2000, the number of reported coccidioidomycosis cases in California averaged 2.5 per 100,000 population annually. However, from 2000 to 2006, the incidence rate more than tripled, increasing from 2.4 to 8.0 per 100,000 population. To characterize this increase, the California Department of Public Health (CDPH) analyzed case and hospitalization data for the period 2000–2007 and preliminary case report data for 2008. The results indicated that, during 2000–2006, the number of reported cases and hospitalizations for coccidioidomycosis in California increased each year, before decreasing in 2007. Annual incidence during 2000–2007 was highest in Kern County (150.0 cases per 100,000 population), and the hospitalization rate was highest among non-Hispanic blacks, increasing from 3.0 to 7.5 per 100,000 population. Health-care providers should maintain heightened suspicion for coccidioidomycosis in patients who live or have traveled in areas where the disease is endemic and who have signs of ILI, pneumonia, or disseminated infection.

Coccidioidomycosis is a reportable disease in California, although laboratories are not required to report. During 1991–1995, California experienced a large epidemic of coccidioidomycosis in the San Joaquin Valley; since 1995, cases of coccidioidomycosis have been reported consistently to local

health departments in California using Confidential Morbidity Reports (CMRs). For the analysis summarized in this report, CDPH reviewed case and hospitalization data for the period 2000–2007 using CMRs and California Patient Discharge Data Set (CPDDS) data. Preliminary CMR case data for 2008 also were analyzed. CMRs include data on the patient's county of residence, sex, and dates of birth, illness onset, diagnosis, and case report. CPDDS data include inpatient discharge diagnoses from all California nonfederal hospitals. Cases with codes for coccidioidomycosis (114–114.5 and 114.9) from the *International Classification of Diseases, Ninth Edition* were selected. Duplicate records were removed so that the CMR data set retained only the first report of a case and the CPDDS retained only the first report of a patient's hospitalization. For the 3% of reported CMR cases with no date of illness onset or diagnosis, year of illness onset was presumed to be year of case report. CMR data were used to calculate incidence rates of reported cases overall and by age, sex, region, and county. Because 34% of reported CMR cases had missing data on race, incidence rates by race were not calculated. CPDDS data were used to calculate rates of first hospitalization overall and by age, sex, race/ethnicity, region, and county. California Department of Finance population projections were used for denominators (3). Negative binomial regression was used to test for statistical significance of change in rates of reported cases

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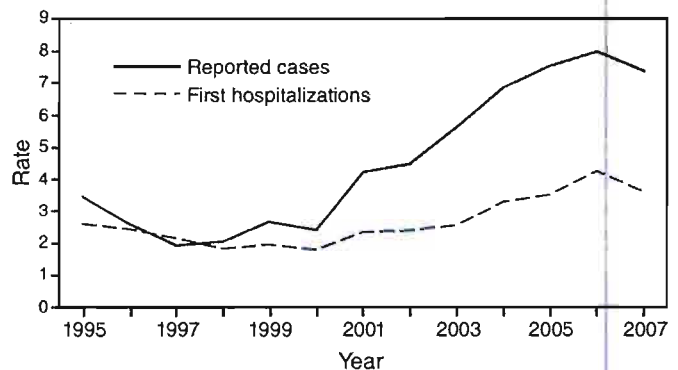
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and hospitalizations during 2000–2006, the period of annual increase in reported cases and hospitalizations. Fatality rates among hospitalized patients were calculated by using CPDDS data for 2000–2007.

After remaining stable since 1995, reported coccidioidomycosis cases in California increased from 816 in 2000 (incidence rate: 2.4 per 100,000 population) to 2,981 in 2006 (8.0 per 100,000 population) ($p < 0.001$) (Figure 1), before decreasing in 2007 to 2,791 cases (7.4 per 100,000 population). Preliminary 2008 CMR data indicated that 1,718 cases were reported in California during January 1–December 6, 2008, compared with 2,210 and 2,426 cases reported during the same period in 2006 and 2007, respectively.

During 2000–2007, estimated average annual incidence was highest among adults aged 40–49 years (3,518 cases [8.0 per 100,000 population]) versus other age groups (Table). A total of 10,909 (65%) cases were reported in male patients, for an average annual rate of 7.6 per 100,000 population, compared with 5,848 cases in females (4.0 per 100,000 population) (Table). The greatest incidence occurred in the San Joaquin Valley region, where coccidioidomycosis is endemic. A total of 12,855 (76%) of California’s 16,970 cases were reported from the San Joaquin Valley during 2000–2007. Reported cases from this region increased from 490 (14.7 per 100,000 population) in 2000 to 2,135 (53.9 per 100,000 population) in 2007. Within the region, Kern County reported the highest incidence every year. Rates of reported cases in Kern County averaged 150.0 per 100,000 population during 2000–2007 (Figure 2), peaking in 2004 at 195.3 per 100,000 population.

FIGURE 1. Rates* of reported cases of coccidioidomycosis and first hospitalizations among persons with coccidioidomycosis diagnosed — California, 1995–2007†



* Per 100,000 population.

† Data on reported cases of coccidioidomycosis are from California Department of Public Health Confidential Morbidity Reports. Data on first hospitalizations of persons with coccidioidomycosis diagnosed are from the California Patient Discharge Data Set. Population data are from California Department of Finance population projections.

TABLE. Total numbers and average annual rates* of reported cases of coccidioidomycosis and first hospitalizations and deaths among persons with coccidioidomycosis diagnosed, by selected characteristics — California, 1995–1999 and 2000–2007†

Characteristic	1995–1999		2000–2007	
	No. of cases	Rate	No. of cases	Rate
Reported cases				
Age group (yrs)				
0–9	182	0.7	532	1.3
10–19	393	1.7	1,695	3.9
20–29	677	2.7	2,793	7.0
30–39	921	3.4	3,379	7.7
40–49	761	3.3	3,518	8.0
50–59	528	3.6	2,180	7.5
60–69	350	3.5	1,307	6.7
70–79	220	2.8	755	5.5
≥80	95	2.3	365	4.2
Sex				
Male	2,572	3.2	10,909	7.6
Female	1,529	1.9	5,848	4.0
Region				
California, overall	4,126	2.5	16,970	5.9
San Joaquin Valley‡	2,829	17.9	12,855	44.1
Kern County	2,003	63.1	8,847	150.0
First hospitalizations				
Age group (yrs)				
0–9	47	0.2	151	0.4
10–19	148	0.6	361	0.8
20–29	348	1.4	853	2.1
30–39	574	2.1	1,409	3.2
40–49	709	3.1	1,851	4.2
50–59	609	4.1	1,690	5.1
60–69	509	5.0	1,130	5.8
70–79	439	5.6	785	5.8
≥80	170	4.2	427	5.0
Sex				
Male	2,237	2.8	5,960	4.1
Female	1,316	1.6	2,696	1.9
Region				
California, overall	3,553	2.2	8,657	3.0
San Joaquin Valley‡	1,418	9.0	4,360	15.0
Kern County	704	22.2	2,206	37.4
Race/Ethnicity¶				
Black, non-Hispanic	349	—	1,005	5.3
White, non-Hispanic	1,947	—	3,800	3.0
Hispanic	881	—	2,869	2.9
Asian/Pacific Islander	212	—	552	1.7
American Indian/ Alaska Native	13	—	28	1.4
Multiracial/Other	60	—	192	3.4
Deaths	307	0.19	752	0.26

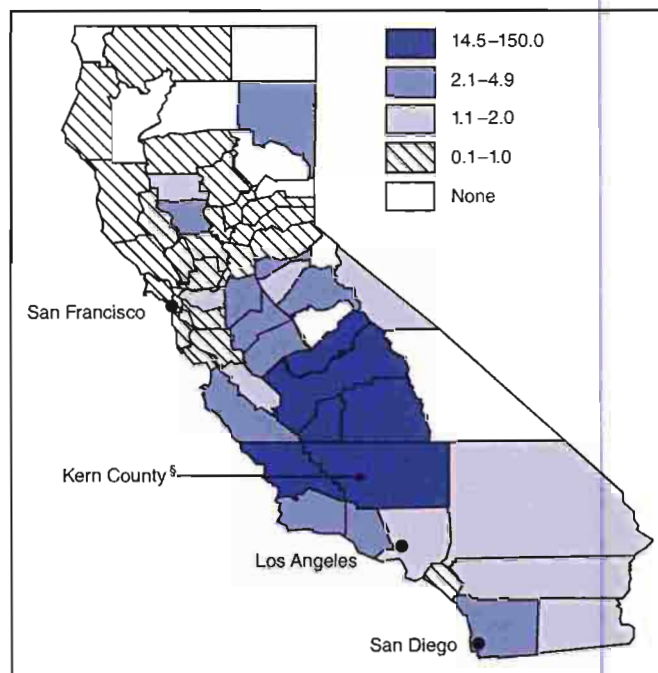
* Per 100,000 population.

† Data on reported cases are from California Department of Public Health Confidential Morbidity Reports. Data on first hospitalizations of persons with coccidioidomycosis diagnosed are from the California Patient Discharge Data Set. Denominator data are from California Department of Finance population projections.

‡ Includes the following California counties: Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare.

¶ Hospitalization rates by racial/ethnic population could not be calculated for 1995–1999 because population estimates for this period included inconsistent race/ethnicity categories.

FIGURE 2. Average annual rate* of reported cases of coccidioidomycosis, by county — California, 2000–2007†



* Per 100,000 population.

† Data on reported cases are from California Department of Public Health Confidential Morbidity Reports. County population data are from California Department of Finance population projections.

‡ Kern County, located in the San Joaquin Valley region, where coccidioidomycosis is endemic, had the highest rate among counties (150.0 cases per 100,000 population).

In California, coccidioidomycosis cases requiring hospitalization increased from 611 in 2000 (1.8 per 100,000 population) to 1,587 in 2006 (4.3 per 100,000 population) ($p < 0.001$), before decreasing to 1,368 (3.6 per 100,000 population) in 2007 (Figure 1). Hospitalizations for coccidioidomycosis were highest among persons aged 60–79 years, averaging 5.8 per 100,000 population during 2000–2007 (Table). By race/ethnicity, hospitalizations were highest among non-Hispanic blacks, compared with non-Hispanic whites, Hispanics, and Asians/Pacific Islanders. From 2000 to 2007, hospitalizations among non-Hispanic blacks increased from 66 (3.0 per 100,000 population) to 169 (7.5 per 100,000 population). Hospitalizations among non-Hispanic whites increased from 297 (1.9 per 100,000 population) in 2000 to 570 (3.5 per 100,000 population) in 2007; hospitalizations among Hispanics increased from 182 (1.6 per 100,000 population) to 485 (3.6 per 100,000 population), and hospitalizations among Asians/Pacific Islanders increased from 36 (0.9 per 100,000 population) to 86 (1.9 per 100,000 population).

By geographic region, hospitalizations for coccidioidomycosis in the San Joaquin Valley increased from 230 (6.9 per 100,000 population) in 2000 to 701 (17.7 per 100,000 population) in 2007.

population) in 2007. Within the region, Kern County reported the highest hospitalization rates, increasing from 121 (18.2 per 100,000 population) in 2000 to 285 (34.9 per 100,000 population) in 2007, and peaking in 2005 at 353 hospitalizations (45.8 per 100,000 population). Overall in California, during 2000–2007, a total of 752 (8.7%) of the 8,657 persons hospitalized for coccidioidomycosis died.

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Editorial Note: This report describes increases in reported coccidioidomycosis cases and hospitalizations during 2000–2007 and the highest incidence rate in California since 1995, the first year that CMR data were available consistently. The number of reported cases and hospitalizations decreased in 2007, and preliminary data indicate those decreases might have continued in 2008. However, rates of coccidioidomycosis in California remain substantially higher than during 1995–2000. These increased rates likely are real, rather than surveillance artifact, because no major changes in diagnosis or reporting of coccidioidomycosis in California occurred before or during the period studied.

Increases in coccidioidomycosis in California are similar to those observed in neighboring Arizona and in the United States overall. Arizona, which annually reports approximately 60% of all coccidioidomycosis cases in the United States, reported a substantial increase in coccidioidomycosis from 1,812 cases (37 per 100,000 population) in 1999 to 5,535 cases (91 per 100,000 population) in 2006 (4). In the United States overall, the number of reported coccidioidomycosis cases increased from 1,697 (0.64 per 100,000 population) in 1996 to 8,917 (6.79 per 100,000 population in 2006) (5). Reasons for these recent increases in reported coccidioidomycosis are not fully understood. Some previous increases have been associated with local environmental and climatic variations (6). Other hypothesized causes include aerosolization of spores caused by soil disturbance during periods of increased construction activity (4), growing numbers of persons who are immunocompromised or have other risk factors for severe disease (7), and immigration of previously unexposed persons from areas where coccidioidomycosis is not endemic (2). Recent increases in coccidioidomycosis in California are partially attributable to several hundred cases reported from two San Joaquin Valley prisons (8) with inmates from areas where the disease is not endemic. Multiple clusters also have been reported at California military bases, where personnel often have intensive dust exposure (9). Such exposure is hypothesized to increase the risk for infection; local outbreaks of coccidioidomycosis have been noted after dust storms (1).

Coccidioidomycosis hospitalization rates in California were highest among persons aged 60–79 years, which is consistent with previous reports that older age might be a risk factor for severe coccidioidomycosis (7). Hospitalization rates also were substantially higher among non-Hispanic blacks, compared with non-Hispanic whites, Hispanics, and Asians/Pacific Islanders. Black race has been associated previously with increased risk for coccidioidomycosis hospitalization (7). In addition, blacks and persons of Filipino ancestry have been found to have increased risk for disseminated coccidioidomycosis, possibly because of underlying differences in susceptible host genetics (1,10). Immunocompromised persons and women in their second and third trimesters of pregnancy also have increased risk for disseminated disease (1).

The findings in this report are subject to at least three limitations. First, because not all persons with coccidioidomycosis seek medical care and not all diagnosed cases are reported to local health departments, this report likely underestimates the actual rate of coccidioidomycosis in California. Second, for cases in which patients were hospitalized, medical chart review was not performed to confirm laboratory diagnosis or cause of death from coccidioidomycosis, resulting in possible overestimation of hospitalizations and deaths in persons with coccidioidomycosis diagnosed. Finally, Kern County's public health laboratory performs much of the coccidioidomycosis testing for patients in that county and might be more likely to report cases routinely than laboratories in most other counties in the San Joaquin Valley region where this is not the practice. In 2009, California plans to make coccidioidomycosis a laboratory-reportable disease to improve completeness and timeliness of case reporting and delivery of targeted public health recommendations during periods of increased disease.

Given the recent increases in coccidioidomycosis in California and Arizona, heightened consideration of this disease is warranted in the differential diagnosis of any patient with ILI, pneumonia, or signs of disseminated infection who has lived or traveled in areas where coccidioidomycosis is endemic. Because intensive dust exposure appears to increase the risk for infection, CDC recommends that persons living or traveling in regions where coccidioidomycosis is endemic who are at risk for severe or disseminated disease (e.g., older persons, pregnant women, immunocompromised persons, and persons of black race or Filipino ancestry) should avoid exposure to outdoor dust as much as possible.* When such exposure is unavoidable, measures to reduce inhalation of outdoor dust, such as wetting soil and using respiratory protection when engaging in soil-disturbing activities, might be

* Additional information available at <http://www.cdc.gov/travel/yellowbook/ch4-coccidioidomycosis.aspx>.

effective. However, options for environmental control of coccidioidomycosis are limited, and no safe, effective vaccine for the disease exists currently. Developing such a vaccine appears to be the best option for preventing disease in those persons at risk for coccidioidomycosis (9).

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Trends in Perinatal Group B Streptococcal Disease — United States, 2000–2006

Group B *Streptococcus* (GBS) is a leading infectious cause of neonatal morbidity and mortality in the United States (1). The bacterium, a common colonizer of the maternal genital tract, can infect the fetus during gestation, causing fetal death. GBS also can be acquired by the fetus during passage through the birth canal or after delivery. Infection commonly manifests as meningitis, pneumonia, or sepsis. In 2002, CDC, the American College of Obstetricians and Gynecologists, and the American Academy of Pediatrics issued revised guidelines for prevention of early-onset GBS disease (i.e., in infants aged <7 days) (2). These guidelines recommended universal screening of all pregnant women for rectovaginal GBS colonization

at 35–37 weeks' gestation and administration of intrapartum antibiotic prophylaxis (IAP) to carriers. A report published in 2007 indicated that, during 2003–2005, the overall rate of early-onset GBS disease increased, whereas incidence of late-onset GBS disease (i.e., in infants aged 7–89 days) remained stable (3). This report updates the 2007 report by incorporating 2006 data from the Active Bacterial Core surveillance (ABCs) system. The updated analysis revealed an increase in the overall rate of early-onset GBS disease from 2003 to 2006, driven by an increasing incidence among black term infants. Late-onset GBS disease incidence among black infants, which had increased during 2003–2005, declined in 2006. Continued monitoring is needed to follow trends in early-onset GBS disease among black infants to determine whether additional interventions are warranted.

ABCs conducts active, population- and laboratory-based surveillance for all cases of invasive GBS disease in selected counties of 10 states.* GBS cases are identified through regular contact with laboratories and are defined as isolation of GBS from a normally sterile body site (e.g., blood or cerebrospinal fluid) or from the placenta or amniotic fluid in cases of fetal death. In 2005, the areas covered by ABCs represented approximately 450,000 live births (11% of U.S. live births); 70% of infants were white, 20% were black, and 10% were of other race. Surveillance areas used standardized case-report forms to collect demographic, neonatal, and obstetric data from medical records. Race and ethnicity were determined from medical records or birth certificates. Multiple imputation procedures were used to address missing data for race and gestational age (4). Live-birth data from state vital records and national vital statistics reports for each respective year other than 2006 were used as denominators for incidence calculations; incidence for 2006 was calculated using 2005 natality data. The Cochran-Armitage test was conducted to determine linear trend significance. The number of surveillance areas changed slightly during 2000–2006 because of the addition of Colorado in 2001 and New Mexico in 2004; New Mexico cases were not included in evaluations of incidence over time. Because the most notable incidence differences have been associated with race rather than ethnicity (5), the trend analyses described in this report focus on race.

During 2000–2006, a total of 1,199 early-onset disease (EOD) and 1,005 late-onset disease (LOD) cases were reported. In 2006, 316 cases were reported (179 EOD and 137 LOD). Of these, 178 (56%) were in white infants, 118 (37%)

* California, Colorado, Connecticut, Georgia, Maryland, Minnesota, New Mexico, New York, Oregon, and Tennessee. Additional information available at <http://www.cdc.gov/ncidod/dbmd/abc>.