



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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

JAMES F. STAHL  
Chief Engineer and General Manager

October 23, 2006

File No.: 1-00.00-00

Mr. Roger E. Johnson, Manager  
Energy Facilities Siting and Compliance Office  
1516 Ninth Street  
Sacramento, CA 95814-5112

Dear Mr. Johnson:

<b>DOCKET</b>	
<b>06-AFC-4</b>	
DATE	OCT 23 2006
RECD.	OCT 31 2006

## Vernon Power Plant Project

The County Sanitation Districts of Los Angeles County (Districts) received your request for agency participation in the review of the subject project on September 25, 2006. The proposed project area is located within the jurisdictional boundaries of District No. 1. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge directly to either the Districts' Vernon Extension Trunk Sewer or Vernon Extension Relief Trunk Sewer, both located in Alcoa Avenue at Slauson Avenue. The 24-inch diameter Vernon Extension Trunk Sewer has a design capacity of 8.9 million gallons per day (mgd) and conveyed a peak flow of 5.2 mgd when last measured in 2004. The 24-inch diameter Vernon Extension Relief Trunk Sewer has a design capacity of 8.2 mgd and conveyed a peak flow of 4.3 mgd when last measured in 2004. A direct connection to a Districts' trunk sewer requires a Trunk Sewer Connection Permit (Permit), issued by the Districts. For information regarding the Permit, please contact the Public Counter at extension 1205.
2. The Districts previously performed a sewer capacity check in the sewers downstream of this project and determined that by redirecting flows to another sewer, the 1,000 gallons per minute (gpm) peak flow rate for the project could be accommodated. In a May 5, 2006 letter to the City of Vernon (City), it was requested that the City notify the Districts as soon as a schedule for the project is available to allow the Districts adequate preparation time for the redirection of flows.
3. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 385 mgd and currently processes an average flow of 316.6 mgd.
4. The proposed project will require a Districts' Industrial Wastewater Discharge Permit (IWD Permit). Project developers should contact the Districts' Industrial Waste Section at extension 2900 for further discussion of potential permitting issues. Project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning

PROOF OF SERVICE (REVISED 10/4/06) FILED WITH  
ORIGINAL MAILED FROM SACRAMENTO ON 10/31/06

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project construction. For additional IWD Permit information, you may visit the Districts' Web site: <http://www.lacsd.org> under "Industrial Waste."

5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the existing strength and/or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is required to construct an incremental expansion of the Sewerage System to accommodate the proposed project, which will mitigate the impact of this project on the present Sewerage System. Payment of a connection fee will be required before a permit to connect to the sewer is issued. When an Industrial Wastewater Discharge Permit is required, the Industrial Waste Section determines connection fee charges.
6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

Additionally, we offer the following comments regarding solid waste management services:

7. The California Integrated Waste Management Board's Web site: <http://www.ciwmb.gov> contains information regarding solid waste disposal facilities. There are numerous public and private landfills and transfer stations in Los Angeles County that could potentially receive waste from the proposed project. The Puente Hills Landfill (PHLF), located at 13130 Crossroads Parkway South in the City of Industry is the closest landfill operated by the Districts that could be used by the proposed project. The conditional use permit (CUP) for the PHLF authorizes the disposal of a maximum of 13,200 tons per day. Typically, the PHLF closes early due to this permit-imposed tonnage restriction. Disposal operations will continue under the CUP until October 31, 2013. The site will then stop accepting waste for disposal.

Other solid waste management facilities operated by the Districts that are available to the proposed project and offer recycling options include the Commerce Refuse-to-Energy Facility (CREF), the Downey Area Recycling and Transfer Facility (DART), the South Gate Transfer Station, and the Puente Hills Materials Recovery Facility (PHMRF). CREF is located at 5926 Sheila Street in the City of Commerce. CREF is a transformation facility that is permitted to accept up to 1,000 tons per day, not to exceed 2,800 tons per week. CREF currently receives approximately 420 tons per day of refuse. DART is located at 9770 Washburn Road in the City of Downey. DART is a materials recovery/transfer facility that is permitted to accept up to 5,000 tons per day and currently receives approximately 1,200 tons per day of refuse. The South Gate Transfer Station is located at 9530 Garfield Avenue in the City of South Gate that is

permitted to accept up to 1,000 tons per day of refuse and currently receives approximately 500 tons per day of refuse. The PHMRF is located at 2808 Workman Mill Road in the City of Whittier and began operating in July 2005. The PHMRF is permitted to accept 4,400 tons per day, not to exceed 24,000 tons per week of municipal solid waste. The PHMRF currently receives approximately 200 tons per day from select commercial waste upon a pre-approved basis or upon satisfactory inspection at the facility.

8. There are eight major landfills currently operating within Los Angeles County. These landfills serve large geographic areas that are not necessarily limited to those areas in the immediate vicinity of these sites. There is insufficient permitted disposal capacity within the existing system serving Los Angeles County to provide for its long-term disposal needs. There are no plans for expansion of the three public landfills currently operated by the Districts. However, there is additional capacity potentially available within Los Angeles County through the expansion of local landfills, and outside of Los Angeles County through the use of waste-by-rail at the proposed Eagle Mountain Landfill in Riverside County and the Mesquite Regional Landfill in Imperial County. Consequently, while this additional capacity will be needed, the necessary permits and approvals have not yet been issued to access and/or use these facilities.

The Districts entered into Purchase and Sale Agreements in August 2000 on the only two fully permitted rail haul landfills in California: the Mesquite Regional Landfill in Imperial County and the Eagle Mountain Landfill in Riverside County. The Districts closed escrow on the Mesquite Regional Landfill in December 2002. Due in part to pending federal litigation, the Districts has not closed escrow on the purchase of the Eagle Mountain Landfill.

In the Mesquite Regional Landfill Waste-by-Rail system, the municipal solid waste will be transported approximately 210 miles to the site via the Union Pacific Railroad main line, which extends from Metropolitan Los Angeles to Glamis and then by a proposed 4.5-mile rail spur built to the site. Upon closing escrow on Mesquite Regional Landfill, a comprehensive master plan for site development was prepared. Following completion of the master plan, the Districts are pursuing concurrent final design and construction of the facilities necessary to begin operation. The Mesquite Regional Landfill is scheduled to be operational by the end of 2008. The Waste-by-Rail system is scheduled to be operational by the end of 2009. Both schedules are consistent with the timetables in the CUP issued by the Los Angeles Regional Planning Commission for the Puente Hills Landfill.

9. The California Integrated Waste Management Act, AB 939, requires cities to divert 50 percent of the waste stream away from land disposal. In order to assist in meeting this goal, the Districts recommend that the proposed development incorporate storage and collection of recyclables into each project design. It is recommended that refuse collection contracts include provisions for collection of recyclables. The County of Los Angeles Department of Public Works should also be contacted with regard to any commercial recycling programs that may be available. All occupants should be encouraged to recycle, at a minimum, newspaper, glass bottles, aluminum and bimetal cans, and P.E.T. bottles. Recycling should be included in the design of the project by reserving space appropriate for the support of recycling, such as adequate storage areas and access for recycling vehicles. In addition, all contractors should be urged to recycle construction and demolition wastes to the extent feasible. It should be recognized that, even with recycling, adequate regional disposal capacity is needed to accommodate new developments. If you have any further questions regarding

Mr. Roger E. Johnson, Manager

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recycling options, please contact Nick Morell, Recycling Coordinator for the Districts at (562) 908 4288, extension 2444.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

James F. Stahl



Ruth I. Frazen  
Engineering Technician  
Property Management Section

RIF:ld

cc: Suzanne Wienke

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE  
STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION  
FOR THE VERNON POWER PLANT PROJECT  
BY THE CITY OF VERNON

DOCKET NO. 06-AFC-4  
PROOF OF SERVICE LIST  
(REVISED 10/4/06)

**INSTRUCTIONS:** All parties shall (1) file a printed, original signed document plus 12 copies OR file one original signed document and e-mail the document to the Docket address below, **AND** (2) all parties shall also send a printed OR electronic copy of the document, plus a **proof of service declaration**, to each of the entities and individuals on the proof of service list:

CALIFORNIA ENERGY COMMISSION  
Attn: DOCKET NO. 06-AFC-4  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

**APPLICANT**

Donal O'Callaghan  
Director of Light and Power  
City of Vernon  
4305 Santa Fe Avenue  
Vernon, CA 90058  
[docallaghan@ci.vernon.ca.us](mailto:docallaghan@ci.vernon.ca.us)

Krisna Nand  
Environmental Project Manager  
City of Vernon  
4305 Santa Fe Avenue  
Vernon, CA 90058  
[knand@ci.vernon.ca.us](mailto:knand@ci.vernon.ca.us)

John Carrier  
Environmental Consultant  
CH2M Hill  
2485 Natomas Park Dr. #600  
Sacramento, CA 95833-2937  
[john.carrier@ch2m.com](mailto:john.carrier@ch2m.com)

**COUNSEL FOR APPLICANT**

Eric Freisch  
City Attorney  
City of Vernon  
4305 Santa Fe Avenue  
Vernon, CA 90058  
[kenomoto@ci.vernon.ca.us](mailto:kenomoto@ci.vernon.ca.us)

**INTERESTED AGENCIES**

Electricity Oversight Board  
770 L Street, Suite 1250  
Sacramento, CA 95814  
[esaltmarsh@eob.ca.gov](mailto:esaltmarsh@eob.ca.gov)

John Yee and Chandrashekhar Bhatt  
South Coast Air Quality Mgmt. District  
21865 E. Copley Drive  
Diamond Bar, CA 91765-4182  
[jyee@aqmd.gov](mailto:jyee@aqmd.gov)  
[cbhatt@aqmd.gov](mailto:cbhatt@aqmd.gov)

**INTERESTED COMMUNITY GROUPS**

Bahraim Fazeli  
Communities for a Better Environment  
5610 Pacific Boulevard  
Huntington Park CA 90255  
[bfazeli@yahoo.com](mailto:bfazeli@yahoo.com)  
[bfazeli@cbeocal.org](mailto:bfazeli@cbeocal.org)

**INTERVENORS**

**\* California Unions for Reliable Energy**  
**Marc D. Joseph, Esq.**  
**Gloria D. Smith, Esq.**  
**Adams Broadwell Joseph & Cardozo**  
**601 Gateway Blvd., Suite 1000**  
**South San Francisco, California 94080**  
[gsmith@adamsbroadwell.com](mailto:gsmith@adamsbroadwell.com)  
[mdjoseph@adamsbroadwell.com](mailto:mdjoseph@adamsbroadwell.com)

**ENERGY COMMISSION**

Jackalyne Pfannenstiel, Chair  
Presiding Committee Member  
[jpffannen@energy.state.ca.us](mailto:jpffannen@energy.state.ca.us)  
[cgraber@energy.state.ca.us](mailto:cgraber@energy.state.ca.us)

James D. Boyd, Commissioner  
Associate Committee Member  
[jboyd@energy.state.ca.us](mailto:jboyd@energy.state.ca.us)

Susan Geffer  
Hearing Officer  
[sgeffer@energy.state.ca.us](mailto:sgeffer@energy.state.ca.us)

James W. Reede, Jr., Ed.D  
Siting Project Manager  
[jreede@energy.state.ca.us](mailto:jreede@energy.state.ca.us)

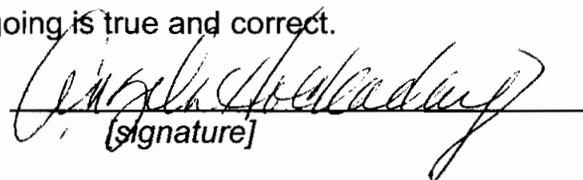
Kenneth Celli  
Staff Attorney  
[kcelli@energy.state.ca.us](mailto:kcelli@energy.state.ca.us)

Margret J. Kim  
Public Adviser  
[pao@energy.state.ca.us](mailto:pao@energy.state.ca.us)

**DECLARATION OF SERVICE**

I, Angela Hockaday, declare that on October 31, 2006, I deposited the required copies of the attached Comment letter from Ruth I Frazen/County Sanitation Districts of LA County to Roger E. Johnson/CEC dated 10/23/06 for the Vernon Power Plant Project, in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.

  
[signature]