

Permit Appeals Workshop

October 20, 2022

Questions and Comments in General	
Name / Affiliation	Comment
Aydin Pasebani, Office of Los Angeles County Supervisor Hilda Solis	Read comment letter into the record. This comment letter was emailed to the Board on December 8, 2022.
Questions and Comments Regarding Notice of an Appeal	
Name / Affiliation	Comment
Florence Gharibian	Suggested that DTSC update the DTSC website when a final permit decision is made and post a copy of the final permit on the website for download. Questioned the manner of notice of final permit decisions. Suggested the need to accommodate people who do not routinely use the computer. As an example, DTSC recently posted notice of the draft permit for PhibroTech on the DTSC webpage.
Questions and Comments Regarding the Administrative Record	
Name / Affiliation	Comment
Florence Gharibian	Expressed familiarity with permit files, and confirmed that these can be quite lengthy and unwieldy. Suggested that the administrative record be maintained at a specific location where members of the public could have access to it, such as the DTSC office or a local library. But there have been cases where people could not find documents at the library, which is bad. Regarding the history of violations, the legal standards that dictate when a history of violations can be published need to be clearly understood. That is information that members of the public want to know. Suggested that South Coast Air Quality Management District informs the public in a more effective way than DTSC. SCAQMD also assembles a work group for each rule that it works on. DTSC ought to consider something similar.
Andrea Ventura, Clean Water Action	Supports the idea of distributing information to the public in a local library and using local media, particularly for issues that generate a lot of local interest. While it is important for the administrative record to be comprehensive, there is also a risk of overwhelming the public because there can be such a large number of documents that are quite lengthy. It would be helpful to include a synopsis to help the public understand what is most important.

Questions and Comments Regarding the Role of Alternative Dispute Resolution

Name / Affiliation	Comment
Florence Gharibian	Expressed concern about a situation where the facility operator meets in private with DTSC's Permitting Division and resolves issues outside of a public process. The company would want to be present for any resolution of the issues, particularly where a community group is involved. It seems that the role of the Board is to ensure that there is a neutral third party involved in the process.