



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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Katherine M. Butler, MPH, Director  
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<https://dtsc.ca.gov/>



**Gavin Newsom**  
Governor

April 3, 2025

Sheena Brooks, Board Clerk  
Board of Environmental Safety  
Department of Toxic Substances Control  
California Environmental Protection Agency  
1001 I Street, 25th Floor, PO Box 806  
Sacramento, CA 95812-0806

**Via Email:** [Appeals@bes.dtsc.ca.gov](mailto:Appeals@bes.dtsc.ca.gov)

RE: DTSC PERMITTING DIVISION'S REQUEST FOR EXTENSION OF TIME TO  
SUBMIT THE ADMINISTRATIVE RECORD INDEX  
BES DOCKET NO. FY24-25-01  
PHIBRO-TECH, INC. (EPA ID NO. CAD 008 488 025)  
SANTA FE SPRINGS, CA 90670  
PERMIT NUMBER: 2024/25-HWM-05

Dear Board of Environmental Safety and Madam Clerk:

The Department of Toxic Substances Control, Permitting Division (DTSC) is writing to request an extension of time to submit the Administrative Record Index for BES Docket No. FY24-25-01 (Phibro-Tech, Inc. (PTI), EPA ID No. CAD 008 488 025; DTSC Permit Number: 2024/25-HWM-05).

DTSC requests a 90-day extension to submit the Administrative Record Index in this matter, from April 28, 2025 to July 28, 2025.

Prior to these appeals being filed, DTSC began diligently working to prepare this matter's Administrative Record Index and Administrative Record. Due to PTI's permitting history, preparing the Administrative Record is uniquely complex and time

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intensive. The records relied upon by DTSC to make the permit decision are particularly voluminous and span more than 30 years. Furthermore, DTSC must obtain and format records that were originated by individuals no longer with DTSC from old, archived electronic databases. This requires additional technical support from the Office of Environmental Information Management. This request is made in good faith, and appellants will not be prejudiced by this delay because this extension will enable DTSC to ensure that the Administrative Record Index and Administrative Record contain all relevant documents, in an accessible format for all parties. DTSC has requested no previous extensions to submit the Administrative Record Index.

Respectfully submitted this April 3, 2025.

Sincerely,

*Anna Kathryn Benedict*

Anna Kathryn Benedict  
Assistant Chief Counsel for Permitting Division  
Office of Legal Counsel  
Department of Toxic Substances Control

cc (Via Email):

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