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DEPARTMENT OF CONSERVATION  
AND DEVELOPMENT

July 8, 2008

Deidra Dingman, Principle Planner  
Contra Costa County  
Department of Conservation & Development  
651 Pine Street, North Wing – 4<sup>th</sup> Floor  
Martinez, CA 94553-1229

Subject: Application to Amend The Land Use Permit For Keller Canyon Landfill  
LP08-2026

Dear Ms. Dingman:

The following are our comments and concerns in regards to the above referenced Land Use Permit (LUP) Amendment:

1. Any changes in the Keller Canyon Landfill LUP regarding increased and revised tonnages would also be required in the facility's Solid Waste Facilities Permit (SWFP). These changes and approvals would be required before implementing any changes to the facility's operation.
2. Materials brought in for beneficial reuse must be tracked and accounted for. Any unused or misused material must be accounted for in the disposal tonnage and all requirements associated with that met.
3. All traffic, including employee and other vehicle traffic not associated with the normal operations of the facility, should be counted in vehicle trips. As the Local Enforcement Agency (LEA) we would want to verify that the proposed vehicle count is in line with the Environmental Impact Report (EIR) and California Environmental Quality Act (CEQA) requirements. Please send us a copy of the CEQA document for review and comment.
4. Reference to Section 17.17 – the request to increase the maximum daily working face is of concern to our Agency. Due to the high winds associated with this facility, there are already occasions when litter control is almost unmanageable. As such, doubling the working face area is not recommended because prevailing winds would likely carry the waste towards the neighborhoods located below the facility.



Thank you for providing the opportunity to make comments. Please keep us apprised of the status of the proposed amendment. Should you have any questions please feel free to contact me at (925) 692-2538.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Eric Fung', written in a cursive style.

William Eric Fung, R.E.H.S.  
Environmental Health Specialist II

cc: John Wiggins, Supervising Environmental Health Specialist  
Vanessa Cordier, Supervising Environmental Health Specialist

WEF:ssm