



COMMUNITY DEVELOPMENT AGENCY  
**ENVIRONMENTAL HEALTH SERVICES DIVISION**

December 29, 2023

**RE: Substantive Change Request Dated June 28, 2023**

We have received and reviewed your Change Request for Approval of Disposal Facilities dated June 28, 2023. The petition requests adding Municipal Waste Combustors to the disposal facility site described in MED-Project's approved stewardship plan on December 18, 2020.

Your petition requests adding to the Plan's accepted disposal facility sites the following municipal waste combustor sites:

- 1) Covanta Indianapolis Facility- A waste to energy facility
- 2) Lancaster County Resource Recovery Facility

Pursuant to Marin County Code Section 7.90.090 C, the proposed disposal technology "must at a minimum provide equivalent or superior protection in each of the following areas: 1. Monitoring of any emissions or waste; 2. Worker health and safety; 3. Reduction or elimination of air, water, or land emissions contributing to persistent, bioaccumulative, and toxic pollution; and 4. Overall impact on the environment and human health."

Accordingly, we approve the alternative disposal method utilizing municipal waste combustor sites on the condition that the facilities have no outstanding violations issued by their local, state, or federal agency with jurisdiction over the facilities in the preceding 12-month period. If the alternative disposal facilities fail to meet this condition, the Director may take action pursuant to Marin County Code Section 7.90.140.

As a reminder, the Stewardship Plan must comply with all applicable local, state, and federal laws in the preceding 12-month period and annual reporting requirements apply.

Sincerely,

*Tara Erfani, R.E.H.S*  
*Solid Waste Program Supervisor*

cc: Lee Bryant, Senior EHS  
Greg Pirie, Deputy Director EHS  
Nicole Anderson, Med-Project