



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:
cuongnguyen@santafesprings.org

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Mr. Cuong Nguyen, Senior Planner
City of Santa Fe Springs
Planning and Development Department
11710 Telegraph Road
Santa Fe Springs, CA 90670

Draft Mitigated Negative Declaration (Draft MND)
Proposed Direct Transfer Facility/Conditional Use Permit No. 775 Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration (Final MND), or at minimum, be included as part of the administrative record.

In the project description, the Lead Agency proposes to obtain a Conditional Use Permit (CUP) to accommodate the remodeling of an existing 13,732 square foot building (with no additional building square footage proposed) in order to operate a direct transfer facility (DTF) sited on a 3.69-acre lot. The approximately 1,155 square feet floor area used for the DTF will be in the remodeled building. The proposed CUP will allow the proposed DTF to accommodate up to a daily maximum of 150 tons of municipal waste.

The SCAQMD staff has concerns that the proposed DTF address potential odor issues from facility operations and from the waste collection and transfer trucks operating near adjacent businesses and traveling near sensitive receptors. Odors could occur at the facility from waste collection trucks enroute to the DTF; queuing before entering the DTF building; from the facility operations itself; and from departing waste collection and transfer trucks leaving to collect addition municipal waste or to remove waste to transfer truck disposal locations.

The SCAQMD staff therefore recommends the following additional measures to reduce potential objectionable odors in addition to the measures included in the Draft MND:

- Include automatic roll-up doors that open and close quickly as trucks enter and depart the transfer building. These automatic roll-up doors are in widespread use at transfer stations and are effective at minimizing odors escaping the facility.
- Apply odor neutralizers to trash on the tipping floor and along the perimeter fence line (e.g., misters and backpack sprayers), which are effective in minimizing odors.

- Routes that are travelled by trucks to and from the facility should be assessed for minimal proximity to nearby sensitive receptors, e.g., residences, schools, etc.
- Some facilities have reduced odor complaints from neighboring businesses and residents by installing charcoal filters on the roofline and maintaining inward air flow at the transfer building openings.

The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JW:JA:GM

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