



# South Coast Air Quality Management District

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June 18, 2015

Mr. Wayne M. Morrell, Director  
City of Santa Fe Springs  
Department of Planning and Development  
11710 Telegraph Road  
Santa Fe Springs, CA 90670

## **Draft Mitigated Negative Declaration (Draft MND)** **Proposed Universal Waste Systems, Inc. Material Recovery Facility 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).

In the project description, the Lead Agency proposes to obtain a Conditional Use Permit (CUP) to construct and operate a materials recovery facility (MRF) and transfer station (TS) at an existing site owned and operated by the project applicant. The existing use is a collection truck storage and repair facility. The proposed project includes some remodeling and demolition of an existing structure followed by construction of a new building and facilities to support a maximum capacity of 1,500 tons per day (TPD) of municipal solid waste, green waste and construction and demolition debris. Public customers and collection trucks would bring waste and recyclables to the proposed site and then transfer trucks would then take consolidated waste to landfills, chip and grind/compost facilities, commodities markets, biomass power plants and other end users. The site is scheduled to be open Monday through Saturday from 7:00 am to 7:00 pm. Operations within the facility will occur from 6:00 am until 10:00 pm, Monday through Saturday. Project operations are scheduled to begin in 2015.

In the Draft MND, the Lead Agency has included compliance with different SCAQMD rules as mitigation. For example, SCAQMD Rule 410 - Odors From Transfer Station and Material Recovery Facilities is included in Mitigation Measure No. 11<sup>1</sup> and SCAQMD Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities is included in Mitigation Measure (MM) No. 12.<sup>2</sup>

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<sup>1</sup> Rule 410 – Draft Mitigation, Monitoring & Reporting Program (MM&RP), Page 4 and Draft MND Page 59.

<sup>2</sup> Draft MM&RP, Page 5.

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Director

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Since these rules are required, the Final MND should include the effects of complying with a rule, regulation or law, etc.. Complying with a rule, regulation, law, etc., should not be considered as mitigation if it is required. The project description and other applicable portions in the Draft MND should therefore be revised to include how the Lead Agency will implement compliance with parts of a specific rule that apply, e.g. Rule 402, Rule 410, and Rule 403, etc..

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. 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*

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