



July 25, 2024

Alejandro De Loera, Assistant Planner
City of Santa Fe Springs
Planning and Development Department
11710 Telegraph Road
Santa Fe Springs, CA 90670

Subject: SCH No. 2024070048 – Draft Mitigated Negative Declaration for Universal Waste Systems, Inc. (SWIS No. 19-AA-1140) – Los Angeles County

Dear Mr. De Loera:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Project Description

The City of Santa Fe Springs Planning and Development Department, acting as Lead Agency, has prepared and circulated a Notice of Completion (NOC) of a Draft Mitigated Negative Declaration (MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed Amendment to CUP No. 733 – Universal Waste Systems, Inc. (UWS), Material Recovery Facility and Transfer Station (proposed project) is located at 9016 Norwalk Boulevard, Santa Fe Springs, CA 9070 within the site boundaries of the existing UWS facility. The facility is located in the northern portion of the City of Santa Fe Springs along the east side of Norwalk Boulevard. Santa Fe Springs is located in southeastern Los Angeles County, approximately eight miles southeast of downtown City of Los Angeles. The City of Santa Fe Springs is bounded by the cities of La Mirada and Norwalk on the south, Downey on the west, an unincorporated Los Angeles County area referred to as West Whittier on the north, and the City of Whittier on the east. The project site is approximately 3.81 acres, and the site is currently zoned for Heavy Manufacturing. Industrial development abuts the site on the east, south, and north sides. A railroad Right-Of-Way (ROW) extends along the site's northern side and industrial uses are located adjacent to the project site on the south and east side. Norwalk Boulevard extends along the site's west side. Industrial uses are located further west, along the west side of Norwalk Boulevard. Smaller commercial and industrial uses are located northwest of the project site, along both sides of Norwalk

Boulevard. The nearest residential neighborhoods are located approximately 400 feet northwest (north of Perkins Avenue) and 600 feet to the north (north of Burke Street).

The proposed project would increase the processing capacity of the existing UWS facility from the current permitted capacity of 1,500 tons per day (TPD) to 2,500 TPD; modify existing building (Building B) to accommodate new equipment required to process and recycle organic waste pursuant to SB 1383; expansion of the facility hours – current hours are open to the public from 7:00 AM to 7:00 PM, Monday through Saturday, with operations within the facility conducted from 6:00 AM to 10:00 PM, Monday through Saturday; new expansion hours would be open to the public from 5:00 AM to 7:00 PM, Monday through Sunday, with operations within the facility conducted from 5:00 AM to 10:00 PM, Monday through Saturday; the expansion hours would also include 24 hours a day operation, with the operations being confined to the interior of the building areas for processing, baling, sorting, equipment maintenance and cleaning; modify parking layout and change number of spaces, decreasing from 104 parking stalls to 54 parking stalls; and add approximately 22,800 square feet of lease railroad property to the 3.81-acre site for use as parking, installation of trash compactors and circulation of solid waste vehicles.

Comments

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft MND, in addition to the specific location noted.

Comments for the Draft MND are summarized below:

Page 3, Description, Building B and Page 13, 2.3 Environmental Setting, Building B. – It is stated that the existing building consists of 10,606 square feet of floor area and that approximately 8,500 square feet will be used for storage of organic waste processing equipment and 3,500 square feet of floor area will remain devoted to bale storage. The cited 8,500 and 3,500 square feet exceed the 10,606 square feet of available floor area. It is understood that these numbers are approximate, but suggest the sum equals the available 10,606 square feet of available floor area.

Page 3, Description, Railroad Property Addition. – It is stated that there will be an additional approximate 22,800 square feet of leased railroad property, in addition to the 3.81-acre site. The current Solid Waste Facility Permit (SWFP) has a permitted area of 3.81 acres and 0.52 acres (22,500 square feet) of leased railroad right-of-way. Will the new permitted area be 3.81 acres and 1.04 acres of leased railroad right-of-way (45,300 square feet; sum of 22,800 and 22,500 square feet)?

Page 9, 2.1 Project Overview and Page 18, Second Paragraph – It is stated that the new hours of receipt (open to the public) will be Monday through Sunday and that the new hours of transfer/operations will be Monday through Saturday. Confirming that is

accurate and that the intention is to have Sunday as only for receipt of waste and not for transfer/operations?

Page 18, Second Paragraph – It is stated that trash truck deliveries are limited to 5:00 AM through 10:00 PM, but receipt from the public is 5:00 AM to 7:00 PM. Are trash truck deliveries classified as being under operations/transfer (5:00 AM to 10:00 PM)? Please provide clarification.

Page 9, 2.2 Project Location, Second Paragraph – It is stated that the assessor's parcel numbers (APNs) that are applicable to the site include 8168-001-014 and 8168-001-015. The current UWS facility SWFP APN is 8168-001-044. Suggest to reverify the APNs for accuracy.

Page 54, Mitigation Measures and Page 71, Mitigation Measures – There are duplicates in the numbering of the mitigation measures. On page 54, there is Mitigation Measure No. 16 (Hydrology and Water Quality Impacts) and Mitigation Measure No. 17 (Hydrology and Water Quality Impacts). On page 71, there is Mitigation Measure No. 16 (Traffic Impacts) and Mitigation Measure No. 17 (Traffic Impacts). Suggest renumbering the mitigation measures so there are no duplicates in the numbering.

Draft MND – The proposed changes are considered significant, pursuant to Title 27 California Code of Regulations (27 CCR) Section 21563(d)(6). In order to incorporate the changes into the SWFP, a permit revision will be required, pursuant to 27 CCR Section 21665(e). Please work with the Los Angeles County Local Enforcement Agency (LEA) on the permit revision process.

Solid Waste Regulatory Oversight

The Department of Public Health is the LEA for Los Angeles County and responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. Please contact the LEA, Dorcas Hanson-Lugo, at 626.430.5540 to discuss the regulatory requirements for the proposed project.

Conclusion

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency in preparing the Final MND and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project. If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

Draft MND - Universal Waste Systems, Inc.
July 25, 2024
Page 4 of 4

If you have any questions regarding these comments, please contact me at 916.323.1799 or by e-mail at nai.teurn@calrecycle.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nai Teurn', with a long horizontal flourish extending to the right.

Nai Teurn, Environmental Scientist
Permitting & Assistance Branch
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Benjamin Escotto - CalRecycle
Dorcas Hanson-Lugo – LEA