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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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May 14, 2014

Ms. Paula Kelly, Senior Planner
City of Irwindale
5050 North Irwindale Ave
Irwindale, CA 91706

Dear Ms. Kelly:

**DRAFT ENVIRONMENTAL IMPACT REPORT
PROPOSED IRWINDALE MATERIALS RECOVERY FACILITY AND TRANSFER
STATION PROJECT- STATE CLEARINGHOUSE NO. 2013051029**

Please note this correspondence supersedes the previously sent correspondence dated May 9, 2014.

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Irwindale Materials Recovery Facility and Transfer Station (MRF/TS), which was released for public comment and review on April 2, 2014. Based on our review of the DEIR, we have the following comments:

- Section 3.6 of the DEIR (page 3.6-10) states “the Proposed Project will not have any disproportionate effects on any disadvantaged population within the Los Angeles region or among local communities, and does not raise environmental justice issues beyond those attributable to the region as a whole.” There are five existing materials recovery and/or recycling facilities located within the area generally bordered by the San Gabriel River (605) Freeway on the west, Foothill Boulevard on the north, Azusa Avenue on the east, and the Pomona (60) Freeway to the south of the proposed project site with a combined total Solid Waste Facility permitted capacity of nearly 18,500 tons per day (tpd). Namely, the five facilities are: Athens Services (in the County unincorporated area of Avocado Heights), Allan Company (City of Baldwin Park), Waste Management (City of Azusa), Grand Central Station (City of Industry), and the Puente Hills Materials Recovery Facility (County unincorporated area of North Whittier). The proposed project together with the five existing facilities in the area will increase the combined total capacity to 24,500 tpd. Considering this capacity exceeds the amount of waste that is generated in the San Gabriel Valley environmental justice issues would need to be addressed especially since single-family homes are located as close as 425 feet from the proposed project site. The DEIR states

the City is sensitive to the environmental effects of projects on the local community. This statement needs to be substantiated in regards to environmental justice.

- It is recommended that the DEIR also analyze potentially siting a permanent household hazardous waste collection center and a conversion technology facility to supplement efforts to manage waste locally, safely, and sustainably.
- Section 2.2 – Project Features, states “the Proposed Project would create a regional asset needed to address and implement a series of legislative measures over the years designed to both promote and mandate the time-certain reduction, recycling, and reuse of solid waste in California; including, but not limited to: Assembly Bill 341 (Chapter 476, Statutes of 2011); Senate Bill 1016 (Chapter 343, Statutes of 2007); and Assembly Bill 939 (Chapter 1095, Statutes of 1989).” The DEIR goes on to state “the Proposed Project, designed to enable and facilitate the separation of recyclables from solid waste, would directly assist the City, surrounding communities, and County to comply with AB 939.” Since the San Gabriel Valley including the City of Irwindale already has adequate capacity to manage the solid waste generated within the area, any statements alluding to the proposed facility having any direct bearing upon the City’s compliance with AB 939 should be clarified in order to be technically accurate.
- Although Chapter 3.3 discusses mitigation measures to control odors at the property, including having a fully enclosed facility with a negative pressure system, exhaust fans to facilitate multiple air exchanges, and misting systems with odor neutralizers, none of the mitigation measures discuss any odor impacts from the vehicles delivering material to the facility. This potential odor impact, particularly on the nearby community, needs to be fully analyzed and discussed.

If you have any questions, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@yahoo.com or (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Council Member, City of Rosemead

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cc: California Department of Resource Recycling and Recovery
Los Angeles County Department of Public Health, LEA (Gerardo Villalobos)
Each Member of the Task Force and the Facility & Plan Review Subcommittee