



June 1, 2026

Audrey Maass
Minnesota Pollution Control Agency
520 Lafayette Road North
Saint Paul, MN 55155

Re: Dayton Transfer Station Environmental Assessment Worksheet (EAW) Comment

Dear Ms. Maass,

The City of Dayton (City) appreciates the opportunity to review and comment on the EAW for the Dayton Transfer Station Project (Project), prepared by Curbside Waste Inc. (Curbside). Upon completing our review, we offer the following.

The Project is located within the City of Dayton. Curbside has been in operation at this location since 2025. Coordination with the City for the original Curbside project at this location as well as the currently proposed Project is outlined in EAW Item 6f. Typical operation hours are Monday through Friday 6:00 AM to 4:30 PM and on those Saturdays following the six major holidays when the holiday occurs on a weekday.

The City acknowledges that while the Project is located in Dayton, the Minnesota Pollution Control Agency (MPCA) is the Responsible Governmental Unit (RGU) per Minn. Rule 4410.4300 Subpart 17 Item C - "For construction or expansion of a mixed municipal solid waste transfer station for 300,000 or more cubic yards per year.

The City of Dayton 2040 Comprehensive Plan identifies the future intended land use for the Project area as Industrial including manufacturing, warehousing, automotive, trucking, office, and other related industrial uses. The City of Dayton Zoning Map identifies the Project area and surrounding areas to the southeast, south, west, and northwest of the Project as I-1 Light Industrial. Planned Unit Development (PUD) is identified for some of I-1 Light Industrial zoned areas to the south of the Project area. Areas to the north, northeast, east, and southeast of the Project Area are zoned A-1 Agricultural District. The Project is deemed compatible with surrounding zoning and land uses. The City understands that Curbside is not proposing a Project or use that will require a zoning change from the existing light industrial use.

The Dayton City Code allows *Commercial and Residential Yard Waste Transfer Station* as a Conditional Use in the I-1 Industrial district and does not permit other types of wastes Curbside proposes. Curbside will be required to apply to amend the Zoning Code to allow other types of wastes to be processed and apply for a Conditional Use Permit for a Transfer Station to process those wastes. The City Council is not supportive of adding outsourced mixed municipal solid waste, and source separated organics.

The City understands the Project will transition from the current waste handling (yard waste) to a broader category of waste handling.

- The Project involves expanding the facility's use from fleet storage/dispatch for 56 Curbside trucks and limited yard waste handling (April to November) to transferring up to 500,000 cubic yards/year of outsourced mixed municipal solid waste, construction and demolition waste, yard waste, source separated organics and single stream recycling.
- With this transition, Curbside acknowledges their ability to receive and transport different waste types and their flexibility to continue collecting and responsibly managing waste materials and expand processing volume to help meet the waste removal needs of residents in the Metropolitan Area in an uncertain future (as described in detail in EAW Item 6d).

As it pertains to the City's review and consideration of the topics and categories outlined in the EAW form, the City provides the following:

- The city is concerned about an increase in; traffic, days & hours of operation, odor, and debris.
- Curbside would manage their operations around the seasonality of yard waste, maintaining consistent number of trucks and overall material handling throughout the year.
- The existing footprint would accommodate the Project and not require external construction or building expansion to process more material types or volume of materials. With the facility infrastructure built and operational, no further excavation or grading activities are planned for the Project. Existing impermeable concrete and asphalt surfaces would be used vehicles and equipment. Curbside is not planning for any soil disturbance.
- The current collection and delivery of yard waste, from a combination of Curbside trucks and other company trucks from the surrounding area, results in a temporary collection of yard waste on the facilities "tipping-floor" before it is transferred to semi-trailers and delivered to the Vonco compost site in Becker, MN at a rate of two to three transfer loads per day. With current operations, little to no material is left on tipping floor overnight.
- No changes are planned for domestic water use (connected to City of Dayton municipal water system).
- As it pertains to potential visual impacts and odors:
 - Curbside staff would receive environmental/compliance training regarding the proper disposal of waste.
 - Curbside states that full coverage doors would be installed to provide full overage doors on all six openings to the transfer station.
 - It appears there may have been a typo in the following portion of this sentence in Item 13b – "...and operational plans would aim to strategically deliver materials when wind speeds are high and could blow material outside the building, which will help keep material contained in the transfer station." It is the City's assumption that this was intended to read: "...and operational plans would aim to strategically deliver materials when wind speeds are not high and could blow material outside the building, which will help keep material contained in the transfer station."
 - Curbside staff would walk the perimeter of the property on a daily basis to ensure that all litter is collected and contained.
 - Curbside would install a second barbed wire arm that leans inward instead of outward to capture additional litter in addition to the current chain link fence surrounding the Project.
 - In EAW Item 6b, the last paragraph under "Potential future transfer station operations" it states: "Project approvals/permits to process the other materials (i.e., MSW, C&D, recycling, and organics), Curbside would load received waste material every afternoon (i.e., Monday to Friday or as described above) onto trailers that are enclosed with a tarp for transportation, and transfer material to the final disposal or processing site the following day. Occasionally, Curbside would store material overnight or over a weekend in the transfer station with the doors closed if the material cannot be loaded onto transfer semi-tractor trailers by end of day or by the end of the work week." Later in EAW Item 17c, it states: "Curbside will manage odors by moving material through the transfer station as quickly as possible. For example, most materials will be loaded and removed from the Project Area on a daily or next-day basis. Odor control measures include the six rolling doors, which Curbside can close as needed to limit the escape of odors from the Project to nearby sensitive receptors as well as good housekeeping procedures, limited onsite storage, and regular floor cleanings. There may be occasional temporary storage of waste materials overnight or over a weekend within the transfer station with the doors closed. Curbside will remove waste materials stored overnight or over a weekend on the following operations day."

The City requests that it be clarified if there may be storage of any type exterior to the transfer station either overnight or over weekend.

- There are a number of places in the EAW that speak to the measures Curbside would take to avoid visual impacts (e.g., barb wire system to capture material that may be blown around); however, this same information is not included in the Visual section of the EAW, which would have been recommended by the City.
- As it pertains to noise,
 - While it is described under the EAW Air item, the following is relevant to noise at the facility:
 - Waste truck drivers would be advised to turn off their engines if they are unloading accepted solid waste onto the tipping floor from a trailer, noting that some vehicles such as packer trucks require the engine remain running to dump the material on the tipping floor. Semitrucks engines would only run when the semi-trucks are entering or leaving the transfer station, they would not idle while being loaded with waste materials to be transferred to the final destination for the solid waste.
 - ***With the need for truck staging (line to await unload at tipping floor), the City would request Curbside confirm that trucks would not run while awaiting one of the four positions available at the tipping floor.***
 - Regarding the EAW Noise section:
 - The facility is at the eastern end of an established industrial park. There are four residential properties to the east across West French Lake Road. Nearby sensitive receptors include a mobile home park approximately 0.3 miles from the Facility to the west, one residence approximately 150 feet to the northeast, and four residences ranging from approximately 0.1 to 0.2 miles to the southeast.
 - Curbside has not received any noise complaints from the residents since the Facility became operational.
 - During the local permitting process for the facility, conditions were established so noise from the facility did not adversely impact nearby residences. These conditions include limiting operating hours and requiring that maintenance activity be complete indoors.
 - On-site activities are described as not creating prolonged noise disturbances including statement that vehicles that come and go throughout the day do not create excessive noise.
 - Noise associated with maintenance activities, including any cutting, welding, or grinding, is completed inside the maintenance building.
 - The most common noise produced on-site that would be produced is the backup beeper sound from collection vehicles and the front loader or bobcat when in use.
 - Curbside would limit all activities associated with the Project to daytime hours (not overnight) and would be in conformance with state and local noise standards. ***The City would request Curbside confirm days and hours of operation.***
 - There will not be any construction-related noise as the Project is already built to handle the requested capacity of waste materials. Curbside is committed to compliance with the noise standards set forth in Minn. Rules, Chapter 7030.0040.
- It is unclear whether EAW Item 21 Cumulative potential effects has been addressed. While the EAW form states that “Preparers can leave this item blank if cumulative potential effects are addressed under the applicable EAW Items”, the City found no mention of cumulative potential effects in the EAW.
- ***In EAW Item 6b (Fire suppression and other site-specific requirements), the City requests Curbside work with the Dayton Fire Chief prior to expansion of operations (or prior to any applicable city permits being issued) to ensure the proper design and implementation of a suitable fire suppression system that would provide the additional fire suppression support for the facility including consideration of the Project.***

The City of Dayton welcomes Curbside and the Minnesota Pollution Control Agencies follow-up on any of the questions or comments we have provided in bold/italics. If there are any changes from the statements from the EAW that we have summarized here, the City would request that these be brought to our attention during INSERT MILESTONE.

Respectfully,

Jon Sevald, AICP
Community Development Director
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