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The Broadway Transfer Station Permit Application and associated Community Impact Assessment (CIA) do not adequately assess the on-site and off-site health risks associated with waste handling operations.

Section 6.2 of the CIA states: "Dust impacts from the handling of waste material will be mitigated by conducting all operations within the transfer station enclosure and through the use of a misting system, which will minimize the potential for dust and particulates to become airborne and leave the property boundary. Given the best management practices which will be utilized at the BTS, dust impacts to surrounding areas are expected to be fully mitigated and therefore no impact is anticipated."

Section 11.5 of the CIA states: "The UWS team agrees that municipal solid waste may contain materials which are capable of emissions that pose risks to human health. However, these risks are mitigated by engineering controls and best management practices utilized in operations. As discussed in Section 12 below, and as described in the facility solid waste operating permit application, all waste transfer operations within the transfer station will be conducted in an enclosed structure which will employ a misting system to minimize generation of particulates and minimize emissions from the property."

Volume 2 – Attachments for the Permit Application: Attachment 3, Sheet C-16 notes: Dust control misting system to be constructed within transfer station building in accordance with architectural plans to be completed following permit approval."

No facility ventilation design details or operational procedures are provided to substantiate the assertion that off-site emissions will be minimized or fully mitigated. No quantitative analysis has been conducted of offsite impacts from particulate emissions during routine municipal waste handling operations or in the event that a prohibited waste type is encountered during waste screening. Details regarding the proposed dust control misting system will not be completed until permit approval.

Attachment 3, Sheet A-201 of the Permit Application provides an elevation drawing of the transfer station. The transfer station as designed includes eight, 18 ft. x 18 ft. station doors on opposing sides of the building. If any doors on opposing sides of the building are open at the same time under windy conditions, the resulting Venturi effect could significantly exacerbate off-site releases in the prevailing wind direction through resuspension of particulates and other loose waste material within the tipping pit. Moreover, the effectiveness of misting as a means to minimize emissions could be nullified. Will any station doors on opposing sides of the facility be open at the same time during waste handling operations including waste tipping, screening and reloading/compaction?

Will the transfer station be equipped with a ventilation system capable of maintaining a negative air pressure within the facility? If so, is the ventilation system fitted with filters or scrubbers? Is the ventilation system capable of maintaining a negative pressure with one or more of the station doors open? What is the air change rate per hour for the transfer station ventilation system? Will particulate air samplers/monitors be provided at the point of exhaust?

Will the proposed misting system be in continuous use during all waste handling operations year-round, including when the ambient outside temperature is below freezing? Is the transfer station heated? What is the removal efficiency of the proposed misting system for respirable size particles? Will the misting system be adjusted seasonally for changes in relative humidity and/or dryness of the waste?

Will the air quality within the waste transfer station be continuously sampled and monitored to ensure occupational safety? If not, are dust masks sufficient respiratory protection for workers assigned to waste screening?

The Broadway Transfer Station Permit Application does not include an up-to-date or complete financial closure cost estimate.

Volume 2 – Attachments for the Permit Application: Attachment 12 – Financial Assurance, reports that the facility is scheduled to be closed within the 20-year term of the proposed permit. Closure costs are estimated at \$84,001.20. This estimate was made in 2021 and did not include any adjustment for inflation. The surety bond amount should be updated to 2026 and include a 20-year adjustment for inflation using the CPI percentage from the US Bureau of Labor Statistics prior to issuance of the permit.