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HEALTH CARE AGENCY**

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ENVIRONMENTAL HEALTH**

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May 24, 2013

Nick Taylor, Associate Planner
Development Services Department
32400 Paseo Adelanto
Santa Juan Capistrano, California 92675

Subject: Comments on Draft Environmental Impact Report for the Rancho San Juan Apartment Project

Dear Mr. Taylor:

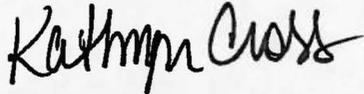
The Orange County Local Enforcement Agency (LEA) is a regulatory agency within the Orange County Health Care Agency- Environmental Health which enforces the solid waste laws and regulations of the State. The proposed Rancho San Juan Apartment Project is located near two facilities which we regulate: Prima Deshecha Landfill and La Pata Greenwaste Facility. We have reviewed the Draft Environmental Impact Report (DEIR) for the Rancho San Juan Apartment Project and have the following comments:

1. Under Public Health and Safety, Existing Conditions 4.5.1, the DEIR states the Prima Deshecha Landfill only accepts non-hazardous municipal solid waste. To be clear, the Class III landfill can accept some special waste such as biosolids which it is currently permitted to accept up to 350 tons/day. The landfill uses engineering controls to minimize the odors migrating offsite but it should be noted that odors may exist from time to time due to the proximity of the landfill to the residential area. The LEA currently receives odor complaints from the Whispering Hills Community and the San Juan Hills High School.
2. Similar to comment 1, La Pata Greenwaste facility located approximately 500 feet from the proposed project, is stated as "having landscaping along the east side of La Pata Avenue that provides effective screening of this facility". The La Pata Greenwaste facility also receives odor complaints from San Juan High School. The DEIR does not address odors from these facilities and the effects that it will have on the multiple family residences.
3. Standard Conditions, Section 4.5.3 requires apartment owner/operator to disclose location of the existing overhead electrical transmission lines. Should there be a condition to disclose the proximity to solid waste facilities to the apartments and the likelihood of occasional odors?
4. In 2011, OC Waste & Recycling informed the Orange County Fire Authority of thermogenic methane gas outside the property boundary of the landfill and adjacent to the Whispering Hills

development. Thermogenic methane gas is not derived from landfill operations and therefore would not be required to be mitigated by the landfill or regulated by the LEA. The DEIR does not address potential impacts from the thermogenic methane gas.

If you have any questions or concerns regarding this letter, please call me at (714) 433-6270.

Sincerely,



Kathryn Cross, REHS
Supervising Hazardous Waste Specialist
Solid Waste Local Enforcement Agency
Environmental Health

Cc: Dianne Ohiosumua, CalRecycle (Riverside office)
John Arnua, OC Waste & Recycling
Amy Grove, San Diego Regional Water Quality Control Board
David Jones, South Coast Air Quality Management District
Anthony Martinez, Environmental Health
Laura Blaul, Orange County Fire Authority