

Harada, Patricia

From: Weaver, Tracy (City Clerk)
Sent: Friday, January 13, 2023 10:47 AM
To: Harada, Patricia; Sandoval, Lili
Subject: Fwd: Public comment for 1/17 (Hyperion)

Hi Patricia,

Please add the email below to the website.

Thank you,

~Tracy

Sent from my iPhone

Begin forwarded message:

From: Corrie Chitlik <corriezupo@gmail.com>
Date: January 13, 2023 at 8:55:27 AM PST
To: ALL ELECTED OFFICIALS <ALLELECTEDOFFICIALS@elsegundo.org>
Cc: Tracey Miller-Zarneke <tmillerzarneke@elsegundoccb.org>, elsegundo.cleanair@gmail.com, "Sassoon, Elias" <esassoon@elsegundo.org>, "Bates, Portland" <pbates@elsegundo.org>, vzupo78@yahoo.com
Subject: Public comment for 1/17 (Hyperion)

[Download full resolution images](#)
[Available until Feb 12, 2023](#)

Hello,

I know this comment is too long to meet the public comment submittal rules. I want to say this comment in person, but I am traveling to the inland empire, and I may not make it back in time. I am still submitting this comment in hopes you watch my two videos, review the attachments, and read the body of this email. I also appreciate the City of ES's letters demanding additional air testing, so hopefully this provides more foundation to your request. You can fact check my statements using the SCAQMD FIND tool and entering facility ID 800214. I am happy to do a zoom call and share my screen and walk you through how to pull the air permit, order of abatements, public records, and compliance history. I think we are at the point where we need to hire a lobbyist. This is a time soak for our city staff and there's no Hyperion urgency or measureable improvements.

[Click to Download](#)

Video.MOV
0 bytes

[Click to Download](#)

Video_1.MOV
0 bytes

Question: Why is there no urgency to test various air toxins (volatile organic compounds via a 24-hr TO-15 sampling) during equipment breakdowns? Why did the AQMD Order of Abatement back in August 2022 only require Hyperion do TO-15 on the day of their choosing, and why aren't the details of the test and results released to the public?

Concern: When you make your public comment, please request TO-15 24-hr continuous sampling during permitted equipment breakdowns. We want to know what toxic pollutants we are being exposed too during extended breakdowns, besides H₂S. Their permitted air pollution control (APC) equipment have NO EMISSION LIMITS or PERIODIC MONITORING REQUIREMENTS. That basically means their APC is only bound by public nuisance rules (Rule 402). What's interesting is the carbon filters had extensive sampling requirements during initial installation, but there's no follow-up testing during breakdowns. Can we sample those same pollutants during breakdowns? It only makes sense, right? Or am I missing something?

Note: I do my research late at night and I physically do not have the personal time to read thousands of pages of data, and listen to hours and hours of hearing board testimony. I am drawing my hypothesis based off of experience & the written air permits. I am not stating anything as fact, but instead, as unanswered questions with follow up concerns. I also forgot to mention there is VOC monitoring/limits for their paint booth (which is obviously not making us physically sick 🤢 it just impacts ozone).

Best regards,

Corrie Zupo



**FACILITY PERMIT TO OPERATE
LA CITY, SANITATION BUREAU (HTP)**

PERMIT TO OPERATE

Permit No. F06769
A/N 424861



Equipment Description:

High Purity Oxygen Reactor's Air Pollution Control System No. 1, consisting of:

1. Two Activated Carbon Vessels (one standby), each with a 6' Dia. x 3' H, carbon bed containing US Filter #100 ACM carbon.
2. Two Exhaust Blowers (one standby), each 10 HP, 1080 cfm maximum capacity, venting the high purity oxygen reactor influent channels.

Conditions:

1. Construction and operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]
3. This equipment shall be operated and maintained by personnel properly trained in its operation.
[Rule 204]
4. The exhaust fan associated with this equipment shall not be operated unless it is vented to the carbon vessel described in this permit. At no time, the operator shall allow the escape of raw gas into the atmosphere.
[Rule 402]
5. A pressure gauge shall be installed to indicate, in inches of water column, the pressure drop across the carbon adsorber.
[Rule 402]
6. The pressure drop across the carbon adsorber shall not exceed 5.0 inches of water column.
[Rule 402]



FACILITY PERMIT TO OPERATE
LA CITY, SANITATION BUREAU (HTP)

7. When operating, the concentration of the hydrogen sulfide at the outlet of the carbon adsorber shall be measured and recorded at least once a week.
[Rule 204]
8. The concentration of sulfur compounds measured as hydrogen sulfide (H₂S) at the outlet of the carbon adsorber shall not exceed 1.0 part per million volume.
[Rule 402]
9. Whenever the H₂S monitoring indicate concentration readings of 0.9 or greater, carbon shall be replaced.
[Rule 204, 402]
10. Spent carbon removed from the system shall be maintained or stored in closed containers prior to removal from site.
[Rule 402]
11. Within 180 days from the initial start-up, unless otherwise approved in writing by the South Coast AQMD, source tests shall be conducted on this equipment in accordance with South Coast AQMD test procedures and written test results shall be furnished to the South Coast AQMD within 60 days after testing. The South Coast AQMD shall be notified 7 days prior to testing so that an observer may be present. Samples shall be taken at the inlet and the outlet of one of the carbon vessels. The samples shall be speciated and shall include but may not be limited to the compounds listed below:
 1. Benzene
 2. Carbon tetrachloride
 3. Chloroform
 4. Chlorobenzene
 5. Dichlorobenzene
 6. Ethylbenzene
 7. Ethylene dichloride
 8. Methylene chloride
 9. Tetrachloroethylene
 10. Styrene
 11. 1,1,1-Trichloroethane
 12. Trichloroethylene
 13. Toluene
 14. Vinyl chloride
 15. Vinylidene chloride
 16. Xylenes
 17. MTBE
 18. Total reduced sulfur as H₂S



South Coast Air Quality Management District
21805 Copley Drive, Diamond Bar, CA 91765-4178

Section D Page 88
Facility ID 000154
Revision # 12
Date August 27, 2008

FACILITY PERMIT TO OPERATE
LA CITY, SANITATION BUREAU (HTP)

19. Total non-methane hydrocarbon as CH₄
20. Ammonia

After the tests, a report shall be prepared and submitted to the South Coast AQMD engineer responsible for the Hyperion permitting activities. The report shall present the emission data in parts per million volume (ppmv).

- 11 1,1,1-trichloroethane
- 12 Trichloroethylene
- 13 Toluene
- 14 Vinyl Chloride
- 15 Xylenes (mixture)
- 16 Xylenes
- 17 MTHU
- 18 Total reduced sulfur as H₂S



South Coast Air Quality Management District
21865 Century Drive, Diamond Bar, CA 91765-4178

Sheet 2	Page 48
Sheet 40	48 of 48
Printed 8/1/2014	11:21

**FACILITY PERMIT TO OPERATE
LA CITY, SANITATION BUREAU (BEP)**

- 19 Total non-methane hydrocarbon as CH₄
- 20 Adjustment

A monitoring report shall be prepared and submitted to the South Coast AQMD engineer upon completion of all permit operating activities. The report shall present the following data in parts per million by volume (ppmv):

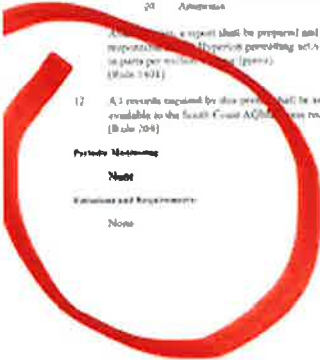
- 12 A) records required by this permit shall be kept on file for at least five years and be made available to the South Coast AQMD upon request (Rule 709)

Periodic Monitoring

None

Violations and Requirements

None



South Coast Air Quality Management District
21865 Century Drive, Diamond Bar, CA 91765-4178

Sheet 2	Page 48
Sheet 40	48 of 48
Printed 8/1/2014	11:21



Share

LA CITY, SANITATION BUREAU (LTP)

PERMITTED EQUIPMENT LIST

The following is a list of all permits to construct, operate and produce to operate in this facility.

Application No.	Permit No.	Equipment Description	Page No.
180218	PA5554	Abreactor Blasting equipment	5
203187	R-021033	D.C. >500 HP, stationary, emergency electric generator (diesel)	7
207188	R-021033		
21		Flare, Station, digester gas	11
25411	118806	APS System, liquid to carbon	13
265148	011136	APS System, liquid to carbon - high purity oxygen production	19
265150	011551	APS System, liquid to carbon - high purity oxygen production	21
283664	022128	APS System, liquid to carbon - waste activated sludge thickening facility	23
292100	011154	APS System, liquid to carbon - biosolids dewatering & digester screening	25
012700	020179	D.C. > 500 HP, stationary, emergency electric generator, diesel, Tier 2	27
013291	020180	D.C. > 500 HP, stationary, emergency electric generator, diesel, Tier 2	29
013293			
013319	M-F 0001	D.C. > 500 HP	31
111497		APS System, carbon and nitrogen	33
420841	041100	APS System, carbon	35
420842	041101	APS System, carbon	37
420843	041171	APS System, carbon	39
420845	040100	D.C. > 500 HP, stationary, emergency electric generator, diesel, Tier 1	41
411111	022129	APS System, liquid to carbon, carbon removal - primary clarifier & secondary clarifier	43
414111	R-F 0001	D.C. > 500 HP, stationary, emergency electric generator, diesel, Tier 2	45
476111			



SOUTH COAST Air Quality Management District
11805 Corporate Drive, Diamond Bar, CA 91765-4128

Version 0:	Page 1
Created 04/11/2018	01
Revised 04/11/2018	02
Revised 04/11/2018	03

FACILITY PERMIT TO OPERATE
LA CITY, SANITATION BUREAU (LTP)

180129	R-040107	D.C. Engine (>500 HP) stationary, emergency, electrical generator, diesel, Tier 2	55
114441	018163	Digester Gas Desulfurization System	57
119111	018061	Fuel Gas Treatment System	59
021041	R-028162	Boiler, 27,500MBTU/hr, digester gas & natural gas	61
011041	018164	Sparg System	63
142291	021060	Dust Collector, cartridge type - abreactor Blasting	65
	018060	D.C. >500 HP, stationary, emergency electric generator, diesel, Tier 2	67
	018064	Storage Tank, aqueous ammonia solution	69
	018065	Color Reducer - Sludge Truck Loading	71
04472	040101	Boiler, 27,500MBTU/hr, natural gas, steel top	73
04511	018067	Storage Tank, aqueous ammonia solution	75
106147	018011	Color Control System - Digester Gas Desulfurization	77



Share