

Harada, Patricia

From: Weaver, Tracy (City Clerk)
Sent: Thursday, January 26, 2023 10:07 AM
To: Harada, Patricia; Sandoval, Lili
Subject: Fwd: Another sewage spill (1-25-2023)- Public Comment, Case No. 1212-40 (Hyperion Order of Abatement)
Attachments: image0.jpeg; Hyperion Air Monitoring Violation (3).pdf

Please post

Tracy Weaver
City Clerk

Begin forwarded message:

From: Corrie Chitlik <corriezupo@gmail.com>
Date: January 25, 2023 at 9:06:19 PM PST
To: clerkofboard@aqmd.gov
Cc: "Boyles, Drew (Mayor)" <dboyles@elsegundo.org>, "George, Darrell" <dgeorge@elsegundo.org>, "Sassoon, Elias" <esassoon@elsegundo.org>, Michelle Keldorf <michellekeldorf@gmail.com>, Tracey <tmitterzarneke@elsegundoccb.org>, Ryan Baldino <baldinoforelsegundo@gmail.com>, "Nicol, Scot (Council Member)" <snicol@elsegundo.org>, "Giroux, Lance (Council Member)" <lgiroux@elsegundo.org>, "Pirsztuk, Carol (Council Member)" <cpirsztuk@elsegundo.org>, "Pimentel, Chris (Mayor Pro Tem)" <cpimentel@elsegundo.org>, John Pickhaver <johnpickhaverjr@gmail.com>, Citizens El Segundo <elsegundo.cleanair@gmail.com>, Sarah Meyer <sarahmeyer426@gmail.com>, Kyle Wheeler <kyleburtonwheeler@gmail.com>, Avery Smith <asmith@elsegundoccb.org>, Mike Lewis <fml@wst2nrg.com>, Julie Stalnack <esnoitall@yahoo.com>, vzupo78@yahoo.com, Lisa Jacobs <ljacobs@scng.com>, Rad <Rad.Nowroozi@sen.ca.gov>, Jessalyn <JWaldron@bos.lacounty.gov>, ALL ELECTED OFFICIALS <ALLELECTEDOFFICIALS@elsegundo.org>, Senator.Allen@senate.ca.gov, mhaynes@aqmd.gov, "Bates, Portland" <pbates@elsegundo.org>, karen.bass@lacity.org, Barbara Ferrer <BFerrer@ph.lacounty.gov>
Subject: Another sewage spill (1-25-2023)- Public Comment, Case No. 1212-40 (Hyperion Order of Abatement)

Hello,

We had another sewage spill and I am VERY CONCERNED. I wasn't able to listen to today's AQMD hearing, but I hope there's urgency to get LASAN District to repair and maintain their equipment. We are on year 3 of continuous LASAN District negligence.

-Corrie Zupo

Sent from my iPhone

On Jan 11, 2023, at 11:12 PM, Corrie Zupo <corriezupo@gmail.com> wrote:

Hello,

I would like to re-submit this entire email thread as a public comment and include my updated attachment. My updated attachment needs to be provided to the Hearing Board ahead of time since it includes screenshots of scrubbed H2S exceedances (note that H2S limits were [last updated in 1969](#), and USC is actively studying the City of Carson and El Segundo, so regulators have updated scientific data to hopefully update health and safety limits), potential pollutants of concern for fence-line monitoring, TO-15 testing recommendations during equipment breakdowns, emails on equipment mismanagement from violation P73348 (issued on 12/26/2022), and historical context on compliance monitoring mis-management. I do not plan to call into the Hearing since it's during working hours. I also request that the Board please be given all the City of El Segundo's comment letters (dating back to early 2022). These letters nicely summarized the needs of our community with common-sense solutions.

Thank you and best regards,

Corrie Zupo

On Tue, Nov 29, 2022 at 3:23 PM Corrie Zupo <corriezupo@gmail.com> wrote:
Hello,

I would like to add to my October 28th, 2022, public comment submittal for the upcoming December 15th, 2022, Hearing Board. I wanted to clarify that the CARB H2S limit is 30 ppb, but I do not agree with this archaic limit. It was established in 1969 and has not been updated since. The World Health Organization (WHO) uses a lower limit of 20 ppb. Our community generally starts smelling H2S around ten ppb. [USC is actively studying](#) the health impacts of long-term H2S exposure since there's limited research on residential exposure greater than a year. I want to be clear that 30 ppb is too high, and we start experiencing acute symptoms around 10 ppb.

I also wanted to note that my understanding is Hyperion did a 24-hour TO-15 VOC sampling on September 27th. I can not find their lab report in the FIND hearing board weekly status reports (Facility ID 800214). The public should have access to this report to ensure that the flow was indeed for 24 hours and that the reporting limits were below the air toxic thresholds. If the reporting limits are above the air toxic thresholds, the lab will report non-detect when in fact, there could be an air toxin present. The source testing protocol should also be made public. Under [SCAQMD Rule 1402](#), the District can ask a facility to prepare an Air Toxics Inventory Report, Health Risk Assessment, or a Risk Reduction Plan. I think it's unclear to the public the extent of chemicals being dumped on us every time the facility has an operational upset (which is frequent). There's a focus on H2S, but other chemicals are transported and mixed between the liquid and gas phases of transport. [VOCs vary in their degree of volatility](#) with factors such as water surface area, temperature, turbulence, concentrations, and retention time. Is there a dig to understand our health impacts from this mismanaged old facility?

References:

- <https://www.dailybreeze.com/2022/11/26/usc-researchers-looking-at-impacts-of-hydrogen-sulfide-on-el-segundo-residents/>

- <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf?sfvrsn=4>
- <https://www.epa.gov/sites/default/files/2015-08/documents/ii05.pdf>

Best regards,

Corrie Zupo

From: Corrie Zupo <corriezupo@gmail.com>
Sent: Friday, October 28, 2022 8:23 AM
To: clerkofboard@aqmd.gov
Cc: mhayes@aqmd.gov; Boyles, Drew (Mayor) <dboyles@elsegundo.org>; Darrell George <dgeorge@elsegundo.org>; Sassoon, Elias <esassoon@elsegundo.org>; Michelle Keldorf <michellekeldorf@gmail.com>; Miller-Zarneke, Tracey <tmillerzarneke@elsegundoccb.org>; Ryan Baldino <baldinoforelsegundo@gmail.com>; Nicol, Scot (Council Member) <snicol@elsegundo.org>; Lance Giroux <lgiroux@elsegundo.org>; Carol Pirsztuk (Mayor pro tem) <cpirsztuk@elsegundo.org>; Pimentel, Chris (Council member) <cpimentel@elsegundo.org>; johnpickhaverJR@gmail.com; Citizens El Segundo <ElSegundo.cleanair@gmail.com>; Sarah Meyer <sarahmeyer426@gmail.com>; Kyle Wheeler <kyleburtonwheeler@gmail.com>; Avery Smith <asmith@elsegundoccb.org>; Mike Lewis <fml@wst2nrg.com>; Julie Stolnack <esnaitall@yahoo.com>; vzupo78@yahoo.com; Lisa Jacobs <ljacobs@scng.com>; Nowroozi, Rad <Rad.Nowroozi@sen.ca.gov>; Waldron, Jessalyn <JWaldron@bos.lacounty.gov>
Subject: Public Comment, Case No. 1212-39 (Hyperion Status Update for Modification of an Order of Abatement)

Hello,

I am a concerned mom and resident of El Segundo. I have provided numerous public comments on Hyperion, and I have attended all the previous Hearing Boards (I lost track of how many have occurred since 7/11/2021). I have also previously waited 4+ hours to make my comments, but at this time, I can't keep missing time away from work and my family to call in. Please include this email **and attachments** as a record of my public comment. I would also appreciate it if the Hearing Board received a copy of my email and attachments ahead of time. From my experience, the Hearing Board is not provided documentation ahead of time, and they base their decisions on presented information on the day of the hearing. I do not find this fair to the public since we are all volunteering our personal time to this health and environmental crisis. I am starting to lose trust in the processes and systems in place to protect our communities.

- The H2S monitors were installed in late August 2022. Since installation, there have been five (5) exceedances of 30 ppb on 8/27/22 (~**140 ppb, the website now says "no data for this timeframe"**), 8/30/22 (31.2 ppb), 8/31/22 (36.3 ppb and 43.5 ppb), and 10/19/22 (34.1 ppb). H2S is an air toxic according to [SCAQMD Rule 1401](#), page 19.
- Since 9/8/2022 (last Order of Abatement), there have been 11 additional Notices of Violations (NOVs). There is a **total of 68 violations** since 7/11/2021. We are experiencing long-term exposure to H2S (and over pollutants of concern), and El Segundo is a highly dense family-oriented community.
- Weekly hearing board updates are all 18 pages long with the same repeated updates. Can the updates please include tracking progress to completion of the John Zink Hamworthy Combustion and George T. Hall Company flare inspection and comprehensive evaluation report submitted on 6/29/22, tracking progress to completion of the Brown and Cadwell Implementation Plan submitted on 9/24/2022, and lastly, tracking progress to completion of the Los Angeles Public Works Report of the Ad Hoc Committee dated 2/11/2022.
- Can the hearing board updates please include the source test protocol for the flaring and for the TO-15 (determination of volatile organic compounds), also please include the actual source test reports. At this point, all confidence in the community has been lost, and we would like these protocols and reports made public. It is tedious to have to keep doing public record requests for this information when it can simply be put in the documents tab of [Hyperion's FIND page](#).
- Lastly, please review my attachments with referenced links of proof. I have put a great deal of time into information gathering, and the information I am attaching has not been included in previous Order of Abatement discussions. Specifically, I have attached Violation P72978 issued on 2/29/2021 for a 2/19/2018 air monitoring failure. **This is a canary in the coal mine as it demonstrates a clear lack of proper emission monitoring 3 years before the 7/11/2021 spill.** My attachment also includes 5 exceedances for H2S.

Thank you,

A concern mom (aka Corrie Zupo)

We appreciate your referrals

As you know, schools, businesses, and public offices are closed and/or imposing other restrictions amid the outbreak of COVID-19 (Coronavirus). Please be advised that PARRIS Law Firm is taking proactive measures to safeguard the health and safety of its employees, their families and our communities, by working remotely. To ensure that all legal communications are promptly received by this office, we kindly request that you serve everything electronically or pursuant to our previous agreement that you should have received requesting Electronic Service Communication. Your professionalism and anticipated cooperation are greatly appreciated.

To ensure that all legal communications are promptly received by this office, we kindly request that you provide us with electronic courtesy copies (to the e-mail address of the attorney of record) of all pleadings, discovery, and correspondence that you are otherwise transmitting to our office via U.S. Mail or overnight delivery. This does not constitute a waiver of the mail/facsimile-service requirements prescribed by California Code of Civil Procedure section 1005 or Federal Rule of Civil Procedure 5, but requested solely as a precautionary measure during this rapidly evolving crisis. We are happy to extend to you the same courtesy. Your professionalism and anticipated cooperation are greatly appreciated.

CONFIDENTIAL COMMUNICATION

E-mail, TXT, MMS, SMS messages from this firm normally contain confidential and privileged material, and are for the sole use of the intended recipient. Use or distribution by an unintended recipient is prohibited, and may be a violation of law. If you believe that you received this E-mail, TXT, MMS, SMS message in error, please do not read this E-mail, TXT, MMS, SMS message or any attached items. Please delete the E-mail, TXT, MMS, SMS message and all attachments, including any copies thereof, and inform the sender that you have deleted the E-mail, TXT, MMS, SMS message, all attachments and any copies thereof. Thank you.

NEWS RELEASE



313 North Figueroa Street, Room 805 | Los Angeles, CA 90012 | (213) 240-8144 | media@ph.lacounty.gov

PublicHealth.LACounty.gov | Facebook.com/LAPublicHealth |
Twitter.com/LAPublicHealth

For Immediate Release:

January 25, 2023

Beach Closures Avoid Water Contact and Wet Sand

LOS ANGELES – The Los Angeles County Department of Public Health has issued beach closures for the following areas due to the release of approximately 64,000 gallons of untreated sewage:

- Mother's Beach in Marina Del Rey
- Venice City Beach, ½ Mile North of Marina entrance
- Dockweiler State Beach, ½ Mile South of Ballona Creek

Public Health officials are advising residents or visitors planning to visit Los Angeles County beaches to avoid contact with ocean water and wet sand in the areas noted above. The cause of the sewage discharge was a blocked main line which resulted in sewage entering the storm drain system at the corner of Admiralty Way and Palawan Way. The blockage has been cleared at this time, and the immediate area cleaned.

The Department of Public Health will conduct water sampling daily, and the closures will remain in effect until Public Health receives sampling results indicating that bacterial levels meet health standards.

Recorded information on beach conditions is available 24- hours a day on the County's beach closure hotline: 1-800- 525-5662. To view the map of impacted locations and for more information, please visit: PublicHealth.LACounty.gov/Beach/.

The Department of Public Health is committed to promoting health equity and ensuring optimal health and well-being for all 10 million residents of Los Angeles County. Through a variety of programs, community partnerships and services, Public Health oversees environmental health, disease control, and community and family health. Nationally accredited by the Public Health Accreditation Board, the Los Angeles County Department of Public Health comprises nearly 4,500 employees and has an annual budget of \$1.2 billion. To learn more about the LA County Department of Public Health and the work they do, visit PublicHealth.LACounty.gov, and follow Public Health on social media at twitter.com/LAPublicHealth, facebook.com/LAPublicHealth, and youtube.com/LAPublicHealth.

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*Los Angeles County Department of Public
Health works to protect health, prevent
disease, and promote health and well-
being.*

Hyperion Air Monitoring Exceedance Log

Summary:

Part 1 of this document includes screenshots of the H₂S exceedances in 2022 and a potential list of pollutants of concern for fence line monitoring (pulled from Hyperion's air permit). It is important to note that H₂S monitoring didn't begin until late August 2022. It is also relevant to note that ***the 8/27/2022 exceedance over 140 ppb H₂S is now no longer available to view to the public on Hyperion's monitoring website. The 12/25/2022 exceedance of 77.2 ppb H₂S has also disappeared.*** I was able to screenshot the exceedances before they were scrubbed from the record. We as a community also want to know why only H₂S is monitored along the fence line. Hyperion's air permit list 20 pollutants of concern (listed below in Part 1). TO-15 testing was recently done during a normal operating day, but normal operation is not representative of our ambient air conditions during breakdowns. **We want to know what the TO-15 results would be during a breakdown.**

Part 2 of this document questions why public nuisance violations were given on 12/26/2022, instead of a failure to comply with Permit No. F66769, A/N 424861, condition #2 (operated and maintained in good operating condition at all times), and condition #4 (no raw gas escaping), condition #6 (checking pressure drop). Please see the email thread from Hyperion outlining the negligence.

Part 3 of this document outlines Violation P72978 issued on 2/29/2021 for a 2/19/2018. **This violation was everyone's warning that Hyperion's air monitoring equipment was not properly been maintained since 2018.**

Reference Information:

- Hyperion Monitoring Website: [LINK](#)
- Hyperion violation count from 7/11/2022-1/22/2023: 70
- Violation P72978 issued on 2/29/2021 for a 2/19/2018 air monitoring failure: [LINK](#)

Hyperion Air Monitoring Exceedance Log

Part 1: H2S Exceedances & potential air pollutants of concern

Pollutant of Concern List from Hyperions Permit. Why do we only have fenceline monitoring for H2S?

of one of the carbon vessels. The samples shall be speciated and shall include but 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
21865 Copley Drive, Diamond Bar, CA 91765-4178

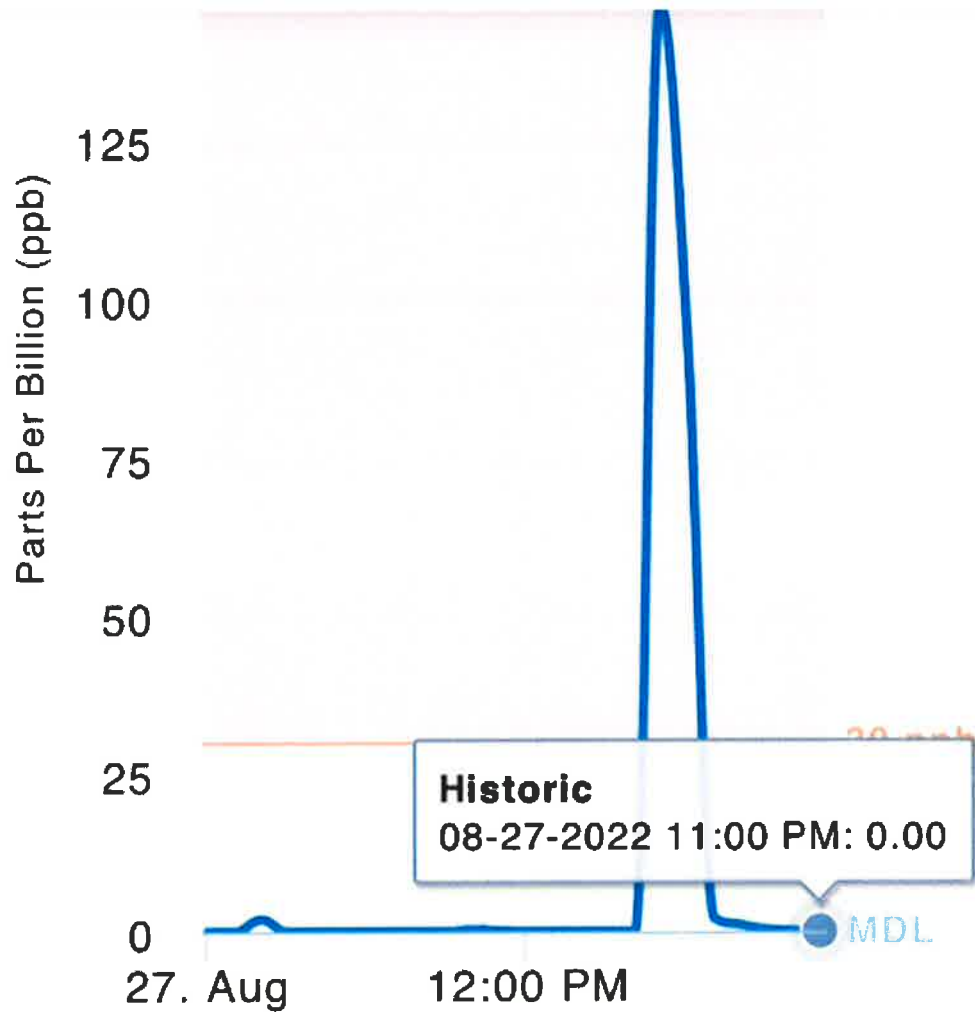
Section I
Facility I
Revision
Date:

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

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

8/27/2022:

Hyperion Air Monitoring Exceedance Log



The data are preliminary and for informational purposes only. Data are subject to change following quality control and auditing.

Potential Sources



Hyperion Air Monitoring Exceedance Log

8/30/22:

Hyperion Air Monitoring Exceedance Log

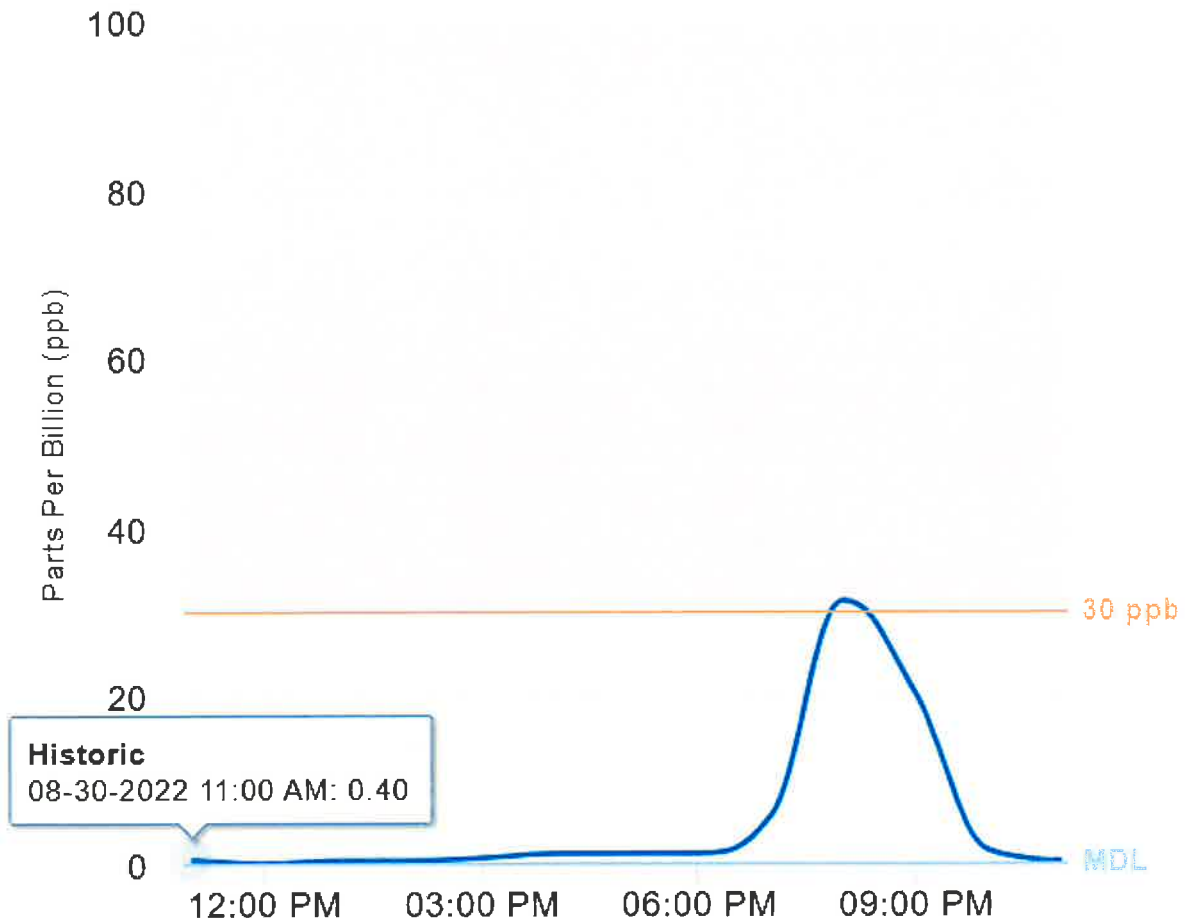
Date

LOCATION

08/30

North Monitoring Station

H₂S (PPB) 1-Hour Average



The data are preliminary and for informational purposes only. Data are subject to change following quality control and auditing.

Potential Sources



Petroleum



Waste Water



Landfill



Volcanic



Hot Springs

Site designed by [Hyperion Water Reclamation Plant](#)

Hyperion Air Monitoring Exceedance Log

8/31/22:

Hyperion Air Monitoring Exceedance Log

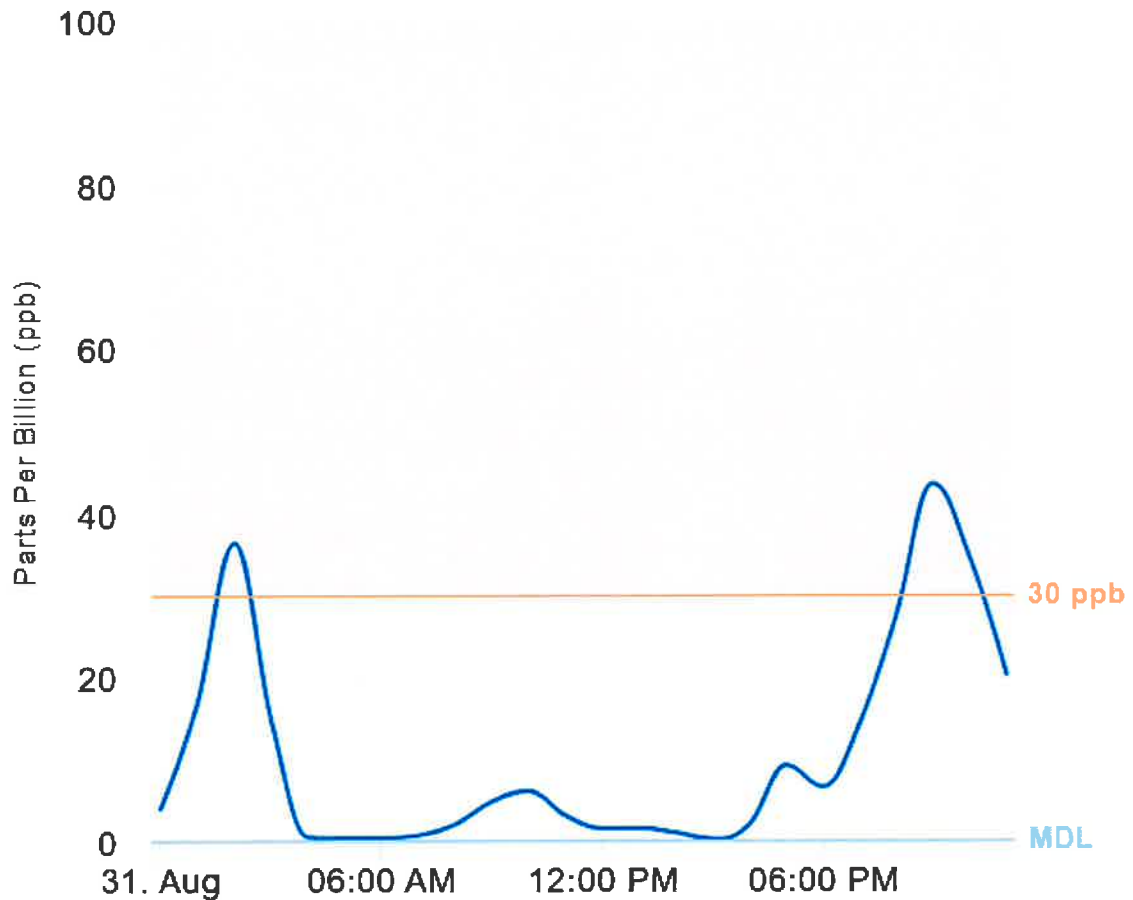
Date

Location

08/31

North Monitoring Station

H₂S (PPB) 1-Hour Average



The data are preliminary and for informational purposes only. Data are subject to change following quality control and auditing.

Potential Sources



Petroleum



Waste Water



Landfill



Volcanic



Hot Springs

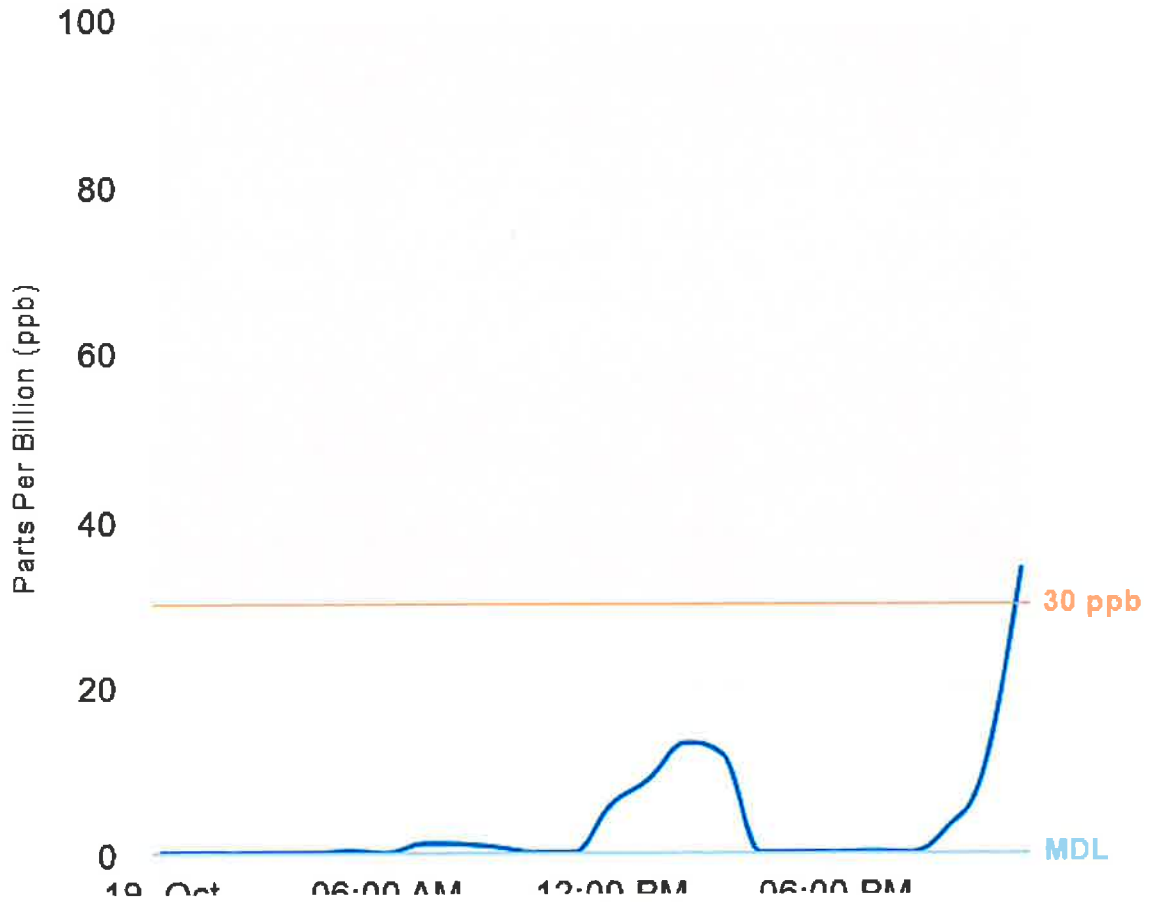
Hyperion Air Monitoring Exceedance Log

10/19/2022:

10/19

North Monitoring Station

H2S (PPB) 1-Hour Average



Site designed by Hyperion Water Reclamation Plant

Hyperion Air Monitoring Exceedance Log

12/20/2022:

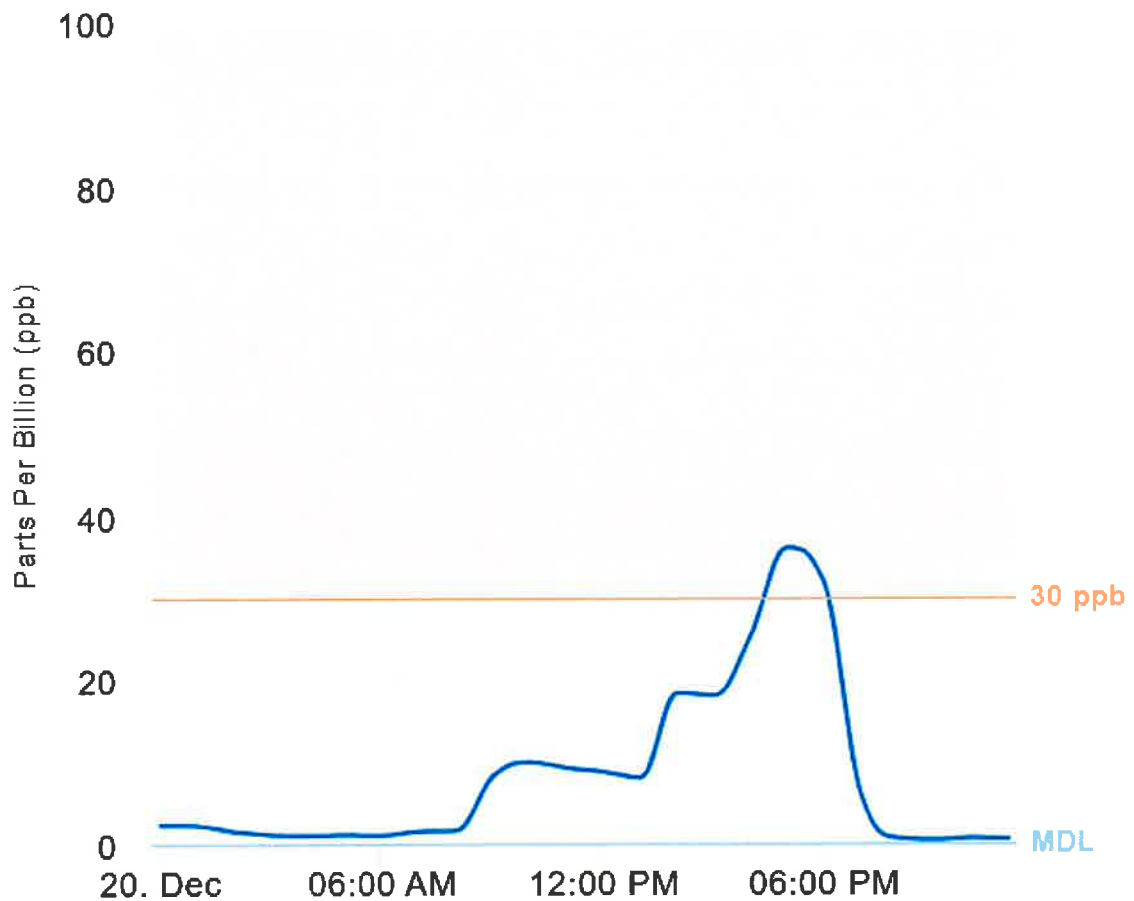
Date

Location

12/20/2022

Central Monitoring Stati

H₂S (PPB) 1-Hour Average



The data are preliminary and for informational purposes only. Data are subject to change following quality control and auditing.

Hyperion Air Monitoring Exceedance Log

12/25/2022:

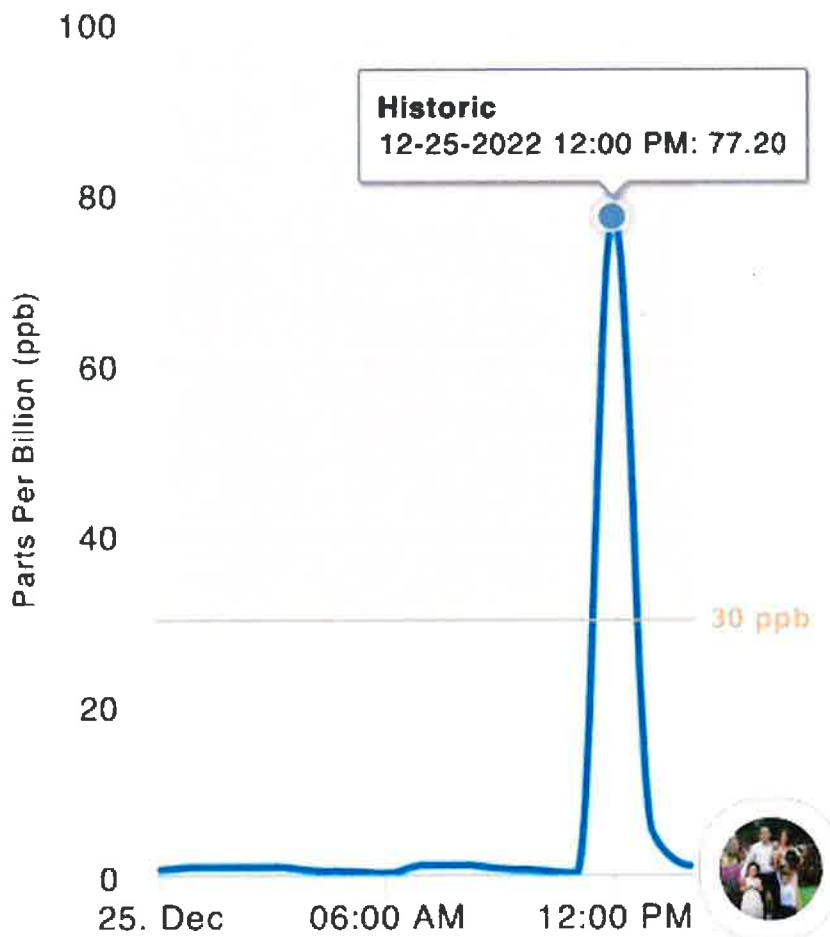
Date

Location

12/25

Central Monitori

H2S (PPB) 1-Hour Average



Home



Watch



Marketplace



Groups



Notifications



Menu

Hyperion Air Monitoring Exceedance Log

Part 2: Violation P73348 was issued on 12/26/2022 for public nuisance under Rule 402

The activated carbon filter was spent and this was properly due to not monitoring the pressure drop and not having extra filters in storage. Besides a Rule 402 violation, why isn't this also a violation issued under Rule 204?

Email from Ms. Durrell on 12/23/2022:

On Dec 23, 2022, at 2:20 PM, Tonya Durrell <tonya.durrell@lacity.org> wrote:

Corrie,

Thank you for your patience as we awaited information from our vendor and AQMD on this issue. The change out of the saturated activated carbon is scheduled December 26, 2022. After the change out, the activated carbon filter will be placed online.

Please let me know if you have any other questions.

Very best,
Tonya

Tonya Durrell

Public Information Director
LA Sanitation and Environment
Community Services Group
Phone: 213-485-5303
Email: tonya.durrell@lacity.org
Web: www.lacitysan.org
24-hour Customer Care: [1-800-773-2489](tel:1-800-773-2489)

Hyperion Air Monitoring Exceedance Log

Email from Ms. Durrell on 12/21/2022:

On Dec 21, 2022, at 10:39 PM, Tonya Durrell <tonya.durrell@lacity.org> wrote:

Good evening all,

In response to the recent inquiries regarding odor complaints at Hyperion, please note that on 12/20, Hyperion staff became immediately aware of the equipment malfunction of an activated carbon filter installed near the south end of the Primary Battery D, near the El Segundo side. The unit was installed to augment the Primary Centralized Scrubber System. Even without the activated carbon filter, the main system-- Primary Centralized Scrubber System, should work independently for most of the collection and treatment of the foul air from the primary treatment area.

Typically when an activated carbon filter is used up or saturated, it will no longer work properly. The saturated activated carbon will have to be replaced before the filter resumes its operations. Yesterday, 12/20/2022, the operations staff, in response to the high H₂S reading measured at the Central Monitoring Station, determined that the activated carbon filter was no longer working effectively. The unit was immediately secured. Hyperion staff are working on replacing the activated carbon and placing the filter back online. Meanwhile, the main, Primary Centralized Scrubber System, is or has been online doing its function as usual.

As part of our communications protocols, this information was provided to the El Segundo Public Works Director last night when the event occurred.

Thank you,
Tonya Durrell
Public Information Director
LA Sanitation and Environment
Community Services Group

Activated Carbon Permit Conditions:

Hyperion Air Monitoring Exceedance Log

PERMIT TO OPERATE

Permit No. F66769
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 Midas OCM 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]

Part 3: Violation P72978 was issued on 2/19/2021 for a 2/19/2018 air monitoring failure

This violation was issued on 2/19/2021 was the cannery in the coal mine that Hyperion was negligent in ensuring our community wasn't being poisoned. I mentioned my concern with this specific violation to Tim Dafeta (Hyperion Plant Manager) on July 21, 2021, via email and phone call. I have been vocal for months that Hyperion has been poisoning our town with not just H2S, but with criteria pollutants (ex. NOx). I created a petition requesting the SCAQMD do a pilot

Hyperion Air Monitoring Exceedance Log

study on our air emission, similar to the study that was done in Boyle Heights: [LINK](#). I emailed this petition with nearly 1,000 signatures. We are all concerned and we need help holding Hyperion accountable.

Facility Information

Business Name	Facility ID	Address
LA CITY, SANITATION BUREAU (HTP)	800214	12000 VISTA DEL MAR PLAYA DEL REY, CA 902

Violation Information

Violation Description	Equipment Description
3002(c)(1) Failure to operate a Title V Facility Permit. I.e. Permit F38896 Cond 6, 10; Permit G15556 Cond 5, 7; Permit G15557 Cond 5, 7; Permit G22328 Cond 5, 7, 8; Permit G15554 Cond 5, 6, 8; Permit G22329 Cond 6, 7, 9, 11; Permit G48627 Cond 7, 15;	Permit G48628 Cond 7, 15; Permit G48628 Con Permit R_N20469 Cond 22, Permit F66769 Cor 218(b)(2) not maintaining CEMS in good worki 218.1(b)(4)(c) no RATA every 12 months

Follow Up Status	Disposition	Disposition Date
Pending		



1. Hyperion Permit: [LINK](#)

Hyperion Air Monitoring Exceedance Log

- 1.1. Responsible Person who's ultimately accountable but he no longer works for Hyperion: [LINK](#)

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: LA CITY, SANITATION BUREAU (HTP)
LEGAL OPERATOR (if different than owner):
EQUIPMENT LOCATION: 12000 VISTA DEL MAR
PLAYA DEL REY, CA 90293-8504
MAILING ADDRESS: 12000 VISTA DEL MAR
~~PLAYA DEL REY, CA 90293-8506~~
RESPONSIBLE OFFICIAL: ENRIQUE ZALDIVAR
TITLE: DIRECTOR AND GENERAL MANAGER
TELEPHONE NUMBER: (213) 485-2210
CONTACT PERSON: TIMEYIN DAFETA
TITLE: PLANT MANAGER
TELEPHONE NUMBER: (310) 648-5555
TITLE V PERMIT ISSUED: August 27, 2019
TITLE V PERMIT EXPIRATION DATE: August 26, 2024

TITLE V	RECLAIM
YES	NOx: NO SOx: NO CYCLE: 0 ZONE: COASTAL

As the Designated Title V Responsible Official for the above company, I hereby designate and assign the duties of Title V Responsible Official to the person or persons listed below. Each person listed below qualifies as a Title V Responsible Official in accordance with AQMD Rule 3000(b)(29)*. This delegation includes a) written reports for the follow-up verbally reported of Emergency, Breakdown, and Excessive Emission Deviations (AQMD Form 500-N; b) Compliance Plans and Quality Improvement Plans (AQMD Form 500-C2); c) the Title V Semi-Annual Monitoring Report (AQMD Form 500-SAM); d) the Title V Annual Compliance Certification (AQMD Form 500-ACC); and e) any and all permit application forms for this facility.

Hyperion Air Monitoring Exceedance Log

1.2. Violated Permit Condition Locations

The following is a list of all Permits to Construct/Operate and Permits to Operate at this facility:

Application No.	Permit No.	Equipment Description	Page No.
G02328	P68554	Abrasive Blasting (cabinet)	6
207187	R-D71033	ICE, >500 HP, stationary, emergency electric generator, diesel	7
207188	R-D71031	ICE, >500 HP, stationary, emergency electric generator, diesel	10
227143	R-D22256	Flare System, digester gas	12
254889	F38896	APC System, liquid scrubber	17
265348	G15556	APC System, liquid scrubber – high purity oxygen reactor	19
265350	G15557	APC System, liquid scrubber – high purity oxygen reactor	21
281664	G22328	APC System, liquid scrubber – waste activated sludge thickening facility	23
299230	G15554	APC System, liquid scrubber – biosolid dewatering & digester screening	25
313290	R-D97879	ICE, 50-500 HP, stationary, emergency electric generator, diesel, Tier 0	27
313291	R-D97880	ICE, 50-500 HP, stationary, emergency electric generator, diesel, Tier 0	30
313293	R-D97882	ICE, 50-500 HP, stationary, emergency electric generator, diesel, Tier 1	33
330359	R-F9091	ICE, >500 HP, stationary, emergency electric generator, diesel	36
351997	F31378	Spray Booth, paint and solvent	39
424861	F66769	APC System, carbon	42
424862	F66770	APC System, carbon	45
424863	F66771	APC System, carbon	47
425835	R-F66848	ICE, 50-500 HP, stationary, emergency electric generator, diesel, Tier 1	49
431055	G22329	APC System, caustic scrubbers, carbon vessels – primary battery & influent/effluent channels	52
454045	R-F80905	ICE, 50-500 HP, stationary, emergency electric generator, diesel, Tier 2	55
476101	R-N20469	Gasoline Storage and Dispensing	58
565288	G48645	Storage Tank, aqueous ammonia solution	90
566147	G49915	Odor Control System – Digester Gas Desulfurization System Oxidizer Tanks	92
577884	G48627	Odor Control System – Influent and Headworks	94
578355	R-G42942	Boiler, 62 MMBTU/hr, digester gas & natural gas	100
578356	R-G42943	Boiler, 62 MMBTU/hr, digester gas & natural gas	103
586726	R-G44104	ICE, >500 HP, stationary, emergency electric generator, diesel, Tier 2	106

1.3. 3002(c)(1) Failure to operate a Title V Facility Permit: [LINK](#)

(c) Duty to Comply

- (1) A person shall construct and operate a Title V facility and all equipment located at a Title V facility in compliance with all terms, requirements, and conditions specified in the Title V permit at all times.

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1.4. Permit F66769 Cond 6 (pg. 17)

6. The pressure drop across the scrubber shall not exceed 6.4 inches of water column.
[Rule 204]

1.5. Permit F66769 Cond 10 (pg. 17)

10. The pressure differential across the scrubber and the carbon adsorber, the scrubbing solution line pressure, and the concentration of hydrogen sulfide at the exhaust shall be measured and recorded at least once a day.
[Rule 204]

1.6. Permit G15556 Cond 5 (pg. 19)

5. The pressure drop across the scrubber shall not exceed 6.4 inches of water column, daily average.
[Rule 204]

1.7. Permit G15556 Cond 7 (pg. 19)

7. A pressure gauge indicating psig shall be installed and properly maintained at the discharge line of each recirculation pump for each scrubber. During operation of the air pollution control system, the pressure indicated by each gauge shall be maintained at less than or equal to 25 psig, daily average.
[Rule 204]

1.8. Permit G15557 Cond 5 (pg. 21)

5. The pressure drop across the scrubber shall not exceed 6.4 inches of water column, daily average.
[Rule 204]

1.9. Permit G15557 Cond 7 (pg. 22)

7. A pressure gauge indicating psig shall be installed and properly maintained at the discharge line of each recirculation pump for each scrubber. During operation of the air pollution control system, the pressure indicated by each gauge shall be maintained at less than or equal to 25 psig, daily average.
[Rule 204]

1.10. Permit G22328 Cond 5 (pg. 23)

5. The pressure drop across each scrubber shall not exceed 4.0 inches of water column.
[Rule 204]

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1.11. Permit G22328 Cond 7 (pg. 24)

7. A pressure gauge indicating psig shall be installed and properly maintained at the discharge line of each recirculation pump for each scrubber. During operation of the air pollution control system, the pressure indicated by each gauge shall be at least 25 psig.
[Rule 204]

1.12. Permit G22328 Cond 8 (pg. 24)

8. A pH and ORP meter shall be installed and properly maintained to indicate the pH and ORP value of the scrubbing solution used in each scrubber. The pH of the scrubbing solution shall be maintained at 8.0 or higher.
[Rule 204]

1.13. Permit G15554 Cond 5 (pg. 25)

5. The pressure drop across each scrubber tower shall not exceed 9 inches of water, daily average.
[Rule 204]

1.14. Permit G15554 Cond 6 (pg. 25)

6. The concentration of sulfur compounds, calculated as hydrogen sulfide, at the outlet to the atmosphere of the scrubber system shall be measured and recorded daily according to a method approved by the South Coast AQMD. The frequency of the measurement may be changed with a written approval from the South Coast AQMD.
[Rule 204]

1.15. Permit G15554 Cond 8 (pg. 26)

8. A pressure gauge indicating psig shall be installed and properly maintained at the discharge line of each recirculation pump for each scrubber tower. During operation of this equipment, the pressure indicated by each gauge shall not exceed 25 psig, daily average.
[Rule 204]

1.16. Permit 22329 Cond 6 (Pg. 53)

6. The concentration of hydrogen sulfide at the exhaust shall be measured and recorded at least once each day.
[Rule 204]

1.17. Permit 22329 Cond 7 (Pg. 53)

7. Flowmeters indicating the scrubbing solution flowrates in gallons per minute shall be installed for each scrubbing stage. The scrubbing solution flowrates shall be monitored and recorded daily.
[Rule 204]

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1.18. Permit 22329 Cond 9 (Pg. 53)

9. A pH indicator and controller shall be installed and maintained for each stage of the scrubbers. The pH of the scrubbing solutions shall be determined during the scrubber optimization works and shall be verified with performance tests. The pH of the scrubbing solutions shall be monitored and recorded daily.
[Rule 204]

1.19. Permit 22329 Cond 11 (Pg. 53)

11. Differential pressure gages indicating the pressure drop across packing, and sight glasses for visual monitoring of packing shall be installed and maintained for each stage of the scrubbers. The packing shall be visually monitored for adequate wetting and possible clogging on daily basis. The pressure drop across the packing shall be monitored and recorded daily.
[Rule 204]

1.20. Permit G48627 Cond 7 (Pg. 96)

7. The concentration of hydrogen sulfide (H₂S) at the outlet to the atmosphere of each odor control system exhaust stack shall be measured using colorimetric tubes, analyzers, or other South Coast AQMD approved methods and recorded, at least once each day.
[Rule 204]

1.21. Permit G48627 Cond 15 (Pg. 97)

15. Until construction is completed, the operator shall keep a daily log of operating parameters of the scrubbers (INF-1, INF-2, HWK-1, HWK-2, HWK-3) and carbon adsorbers (CAT-INF-1, CAT-INF-2 or CAT-INF-3) including, but not limited to, the pressure drop in inches of water of the discharge pressure of the recirculation pump in psig, the pH of the recirculating solution, the sodium hypochlorite and caustic feed rates, the differential pressure across each scrubber (INF-1, INF-2, HWK-1, HWK-2, HWK-3) and each carbon adsorber (CAT-INF-1, CAT-INF-2 or CAT-INF-3), and the outlet H₂S concentration in ppmv.
[Rule 204]