

Harada, Patricia

From: Weaver, Tracy (City Clerk)
Sent: Thursday, March 9, 2023 12:13 PM
To: *ALL CITY CLERKS
Subject: Fwd: Need fenceline air samples on days like today

The email below will need posting for the next meeting.

~Tracy

Sent from my iPhone

Begin forwarded message:

From: "Corrie (Chitlik) Zupo" <corriezupo@gmail.com>
Date: March 9, 2023 at 11:36:30 AM PST
To: ALL ELECTED OFFICIALS <ALLELECTEDOFFICIALS@elsegundo.org>, ALL ELECTED OFFICIALS <ALLELECTEDOFFICIALS@elsegundo.org>, Tracey Miller-Zarneke <tmillerzarneke@elsegundoccb.org>, Citizens El Segundo <elsegundo.cleanair@gmail.com>, "Sassoon, Elias" <esassoon@elsegundo.org>, Kyle Wheeler <kyleburtonwheeler@gmail.com>, Sarah Meyer <sarahmeyer426@gmail.com>
Subject: Need fenceline air samples on days like today

Hello,

Today would be a really good day for continuous (not instant)TO-15 sampling. Hyperion did TO-15 sampling on 9/27/22 when there was no equipment breakdowns. They need to sample on days like today when there's clearly malfunctioning. If you read the report from 9/27, there's small hits of various VOCs on a good day. Imagine what those levels would be like today, which is a bad day. Their air permit hints at the pollutants of concern, but they also have non-VOC concerns such as arsenic.

-Corrie

further to under the Notification Risk Level in Rule 1402.

A.22. LA City, Sanitation Bureau (Hyperion Treatment Plant) (ID 800214) – Playa del Rey

The City of Los Angeles owns and operates the Hyperion Water Reclamation Plant (Hyperion) in the Playa del Rey community. Hyperion is a publicly owned wastewater treatment plant with over 275 million gallon capacity with primary and full secondary treatment processes. As part of the treatment process, more than 885,000 pounds of solid and organic materials are removed daily and treated through anaerobic digestion.

On October 28, 2016, South Coast AQMD staff sent a letter requiring Hyperion to prepare either an ATIR or a VRRP due to the facility having a priority score greater than 10 based on its 2015 annual emissions inventory with perchloroethylene and arsenic as the main air toxics contributing to the high priority score.

On November 23, 2016, Hyperion elected to participate in the Voluntary Risk Reduction Program and submitted a VRRP on January 24, 2017. Throughout 2018, South Coast AQMD and Hyperion staff have been working to resolve various issues regarding electronic format of the emissions inventory, the use of unapproved source tests, the distribution of emissions, and receptor grid spacing. Comments were provided to Hyperion on February 9, 2018 and the facility submitted revisions to the EIM files on March 14, 2018. Upon review, South Coast AQMD staff found additional errors and requested revisions on September 4, 2018. Hyperion submitted revised EIM files on December 19, 2018. South Coast AQMD staff completed its review of the VRRP EIM files and provided comments to Hyperion on January 31, 2019. The facility made the requested changes and submitted revised EIM files on February 19, 2019. South Coast AQMD staff approved the VRRP as an ATIR on April 3, 2019.

A.23. LA City, Sanitation Bureau (Hyperion Treatment Plant) (ID 800214) – Playa del Rey

A.21 Kirkhill Inc (ID 187823) - Brea

Kirkhill Inc (Kirkhill) is a rubber manufacturing facility located in Brea. Kirkhill produces multiple types of rubbers for industries including aerospace and medical manufacturing. The rubber manufacturing process includes raw material mixing, milling, pressing, and various types of curing.

On January 31, 2018, South Coast AQMD staff sent a letter requiring Kirkhill to prepare either an ATR or a VRRP due to the facility having a priority score greater than 10 based on its 2015 annual emissions inventory. The main air toxic contributing to the priority score is hexavalent chromium from mixers, mills, presses, ovens, autoclave, and roto-curing devices.

Kirkhill elected to prepare an ATR and submitted it on July 3, 2018. On October 19, 2018, South Coast AQMD staff sent a letter to the facility approving the ATR and requiring the preparation of an HRA based on the approved ATR. Kirkhill submitted the HRA on January 17, 2019. After requesting and receiving several revisions from Kirkhill, South Coast AQMD staff approved the HRA on September 19, 2019. The HRA results representing the 2015 inventory year indicated that Kirkhill posed a maximum cancer risk of 18.8 chances in-one-million based on a 30 year residential exposure and a maximum cancer risk of 15.9 chances in-one-million based on a 25 year worker exposure. The cancer risk was mainly due to hexavalent chromium from coloring dyes in the rubber manufacturing process.

Since the HRA results were above the Notification Risk Level in Rule 1402, Kirkhill was required to notify the public about the health risk. Notices of the public notification meeting were sent out to over 900 people in the area of impact. South Coast AQMD staff held a public notification meeting at Brea Junior High School on November 13, 2019 to explain the impact of Kirkhill's emissions on public health and to discuss actions taken by the facility to reduce risk.

Since the HRA results were below the Action Risk Level in Rule 1402, Kirkhill was not required to take action to reduce its health risks. However, Kirkhill voluntarily ceased usage of coloring dyes containing chromium in its rubber manufacturing process and submitted permit applications for several of its previously Rule 219 exempt devices to allow South Coast AQMD to enforce the reduction. By ceasing usage of coloring dyes containing chromium, Kirkhill reduced its risk even further to under the Notification Risk Level in Rule 1402.

A.22 LA City, Sanitation Bureau (Hyperion Treatment Plant) (ID 800214) - Playa del Rey

The City of Los Angeles owns and operates the Hyperion Water Reclamation Plant (Hyperion) in the Playa del Rey community. Hyperion is a publicly owned wastewater treatment plant with over 275 million gallon capacity with primary and full secondary treatment processes. As part of the treatment process, more than 885,000 pounds of solid and organic materials are removed daily and treated through anaerobic digestion.

On October 28, 2016, South Coast AQMD staff sent a letter requiring Hyperion to prepare either an ATR or a VRRP due to the facility having a priority score greater than 10 based on its 2015 annual emissions inventory with perchloroethylene and arsenic as the main air toxics contributing to the high priority score.

On November 23, 2016, Hyperion elected to participate in the Voluntary Risk Reduction Program and submitted a VRRP on January 24, 2017. Throughout 2018, South Coast AQMD and Hyperion staff have been working to resolve various issues regarding electronic format of the emissions inventory, the use of unapproved source tests, the distribution of emissions, and receptor grid spacing. Comments were provided to Hyperion on February 9, 2018 and the facility submitted revisions to the EIM files on March 14, 2018. Upon review, South Coast AQMD staff found additional errors and requested revisions on September 4, 2018. Hyperion submitted revised EIM files on December 19, 2018. South Coast AQMD staff completed its review of the VRRP EIM files and provided comments to Hyperion on January 31, 2019. The facility made the requested changes and submitted revised EIM files on February 19, 2019. South Coast AQMD staff approved the VRRP as an ATR on April 3, 2019.

A.23 LA City, Street Maintenance Bureau Department of Public Works (ID 25196) - North Hollywood

LA City, Street Maintenance Bureau Department of Public Works (LA City, Street Maintenance) is an hot mix asphalt plant in North Hollywood. The facility is a city owned public utility that provides maintenance work on city streets in Los Angeles. The plant includes equipment such as silos, dryers, asphalt tanks, and associated air pollution control equipment.

On September 4, 2019, South Coast AQMD staff sent a letter requiring LA City, Street Maintenance to prepare an ATR due to the facility having a priority score greater than 10 based on its 2017 annual emissions inventory. The risk driver for this facility is polycyclic aromatic hydrocarbons (PAHs) from the hot mix asphalt plant.

LA City, Street Maintenance elected to submit an amendment to their 2017 quadrennial emissions report. As of the end of 2019, the amendment was under review. The ATR is due in February 2020.

A.24 Light Metals (ID 83102) - City of Industry

Light Metals Inc. (Light Metals) is located in the City of Industry and produces secondary aluminum alloy by processing recycled aluminum into ingot for the metal casting industry. On August 2, 2019, South Coast AQMD staff sent a letter requiring Light Metals to submit an ATR or VRRP due to the facility having a priority score greater than 10 based on its 2017 annual emissions inventory with polychlorinated dibenzofurans as the main air toxic contributing to the high priority score. Light Metals chose the ATR option and submitted their ATR on December 31, 2019.

A.25 Los Angeles By-Products (ID 60384) - Sun Valley

Los Angeles By-Products (LA By-Products) operates a landfill gas collection system and flares for combustion of the landfill gas and is located in Sun Valley, California.

On August 23, 2019, South Coast AQMD staff sent a letter requiring LA By-Products to submit

Table 1 – AB 2588 Program Facilities in 2019

Facility Name	ID No.	Facility Name	ID No.
Aerocraft Heat Treating Co. Inc.	23752	Pac Rancho, Inc.	140871
Air Liquide Large Industries U.S., LP	148236	Pacific Clay Products, Inc.	17953
All American Asphalt - Irwindale	114264	Pasadena Department of Water and Power ^b	800168
All American Asphalt - Perris	148146	Phillips 66 Co/LA Refinery Wilmington Plant *	171107
Anaplex Corp	16951	Phillips 66 Company/Los Angeles Refinery *	171109
Arconic Global Fasteners & Rings, Inc.	134931	Plains West Coast Terminals	800417
Chevron Products Co. (El Segundo Refinery)	800030	Robertson's Ready Mix – Redlands	42623
City of Cerritos, Water Division	74396	Robertson's Ready Mix – Gardena	134112
Eco Services Operations Corp.*	180908	San Diego Gas & Electric	4242
Eisenhower Medical Center	3671	SFPP, L.P.*	800278
Elite Comfort Solutions*	182610	So Cal Edison Co*	4477
Equilon Enter. LLC, Shell Oil Prod. US*	800372	So Cal Gas Co./Playa del Rey Storage Facility	8582
Evonik Corporation*	183926	So Cal Holding, LLC	169754
Gerdau/TAMCO	18931	Tesoro Refining & Marketing Co., LLC, Calciner*	174591
Glendale City, Glendale Water & Power ^c	800327	Tesoro Refining & Marketing Co., LLC, Los Angeles Refinery*	800436 174655 174694 174703
Hixson Metal Finishing	11818	Tesoro Refining & Marketing Co., LLC (Sulfur Recovery Plant)*	151798
Holliday Rock Co., Inc.	41580		
Kirkhill Inc*	187823		
LA City, Sanitation Bureau (Hyperion Treatment Plant)*	800214		
LA City, Street Maintenance Bureau Department of Public Works	25196	Torrance Refining Co. LLC.	181667
Light Metals*	83102	TST, Inc.*	43436
Los Angeles By-Products	60384	Ultramar, Inc.*	800026
Lubeco, Inc.	41229	Vista Metals Corporation*	14495
MM West Covina LLC*	113873	Vorteq Pacific	191677
Motion Picture & Television Fund	16211	Whittier Fertilizer	511
PABCO Bldg Products LCC	45746		

Note: * indicates facilities notified to prepare either an ATIR or a VRRP.

Facility Categories	Number of Facilities
Printing/Publishing	2
Pulp and Paper Manufacturing	5
Other Industrial/Manufacturing	63
Landfill - Industrial Waste	1
Landfill - Municipal Solid Waste	20
Wastewater Treatment - Industrial	1
Wastewater Treatment - Municipal	21
Other Waste Disposal	2
Total Facilities	471

Table 2-2: Rule 1402 Risk Categories

Rule 1402 Levels	Thresholds	Requirements	RRP Implementation Timeline
Notification Risk Level	Cancer risk of 10 chances in-one-million or greater Acute or chronic HI of 1.0 or greater Exceeding lead National Ambient Air Quality Standard (NAAQS)	Public notification	No risk reduction required
Warning Risk Level	Cancer risk of 10 chances in-one-million or greater Acute or chronic HI of 1.0 or greater Exceeding lead National Ambient Air Quality Standard (NAAQS)	Public notification (modified) and implement VRRP	No later than 2.5 years after approval of plan (an additional 2.5 years extension may be requested)
Action Risk Level	Cancer risk greater than 25 chances in-one-million Cancer burden of 0.5 or more Acute or chronic HI of 3.0 or more Exceeding lead NAAQS	Public notification and implement RRP	No later than 2.5 years after approval of plan (an additional 2.5 years extension may be requested)
Significant Risk Level	Cancer risk of 100 chances in-one-million or greater Cancer burden of 0.5 or more Acute or chronic HI of 5.0 or more	Public notification and implement RRP	No later than 2 years after approval of plan for facilities designated as Potentially High Risk Facilities



has not yet occurred at the end of 2019. The first annual progress report is due in April 2020. Staff continues to work with the facility to ensure the Revised RRP is fully implemented.

A.3. Air Liquide Large Industries U.S., LP (ID 148236) – El Segundo

Air Liquide Large Industries U.S., LP (Air Liquide) is a hydrogen plant located within the Chevron El Segundo Refinery facility on land leased from Chevron. Air Liquide and Chevron are independent parties and share no common ownership or employees. The plant began operations in 2004 and was originally part of Chevron before separating in 2008. The plant produces up to 90 million standard cubic feet of hydrogen per day and 227,000 pounds of steam per hour. Air Liquide receives its feed streams which include refinery fuel gas and natural gas from Chevron and sends its products of hydrogen and steam back to Chevron. Hydrogen is used in various aspects of petroleum refining.

On January 25, 2019, South Coast AQMD staff sent a letter requiring Air Liquide to prepare an ATIR due to the facility having a priority score greater than 10 based on its 2016 emissions. The main toxic air contaminants contributing to the priority score are arsenic and arsenic compounds, nickel and nickel compounds, and cadmium and cadmium compounds. The main sources of emissions are from the reformer heater.

Air Liquide submitted its ATIR on June 25, 2019. The ATIR was in review as of the end of 2019.

approvable on March 6, 2019.

A.9. Chevron Products Co. (El Segundo Refinery) (ID 800030) – El Segundo

Chevron Products Co. (Chevron) is a 1,000 acre petroleum oil refinery in the City of El Segundo with a 290,000 barrels of crude oil per day processing capacity. Chevron has approximately 20% of the gasoline market share in Southern California and is one of the largest refineries on the West Coast. The main products of the refinery are transportation fuels, such as gasoline, jet fuel, and diesel fuel.

On October 14, 2016, South Coast AQMD staff sent a letter requiring Chevron to prepare either an ATIR or a VRRP due to the facility having a priority score greater than 10 based on its 2015 annual emissions with furans, polycyclic aromatic hydrocarbons, arsenic, cadmium, and related compounds as the main air toxics contributing to the high priority score. Chevron elected to participate in the Voluntary Risk Reduction Program and submitted a VRRP on March 27, 2017. Reductions of diesel particulate matter (DPM) from unpermitted internal combustion engines along with reductions of hexavalent chromium from unpermitted welding are elements of the VRRP. In 2018, staff have worked with the permitting teams to evaluate options for incorporating these requirements so that they are enforceable. The VRRP was approved on April 24, 2019. Chevron will submit annual progress reports on the status of their voluntary risk reduction measures as well as a Final Implementation Report once all voluntary risk reduction measures are implemented.

-Corrie

1 OFFICE OF THE GENERAL COUNSEL
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
2 ERIKA CHAVEZ, SBN 265247
SENIOR DEPUTY DISTRICT COUNSEL
3 RYAN P. MANSELL, SBN 332477
SENIOR DEPUTY DISTRICT COUNSEL
4 21865 Copley Drive
Diamond Bar, California 91765
5 TEL: 909-396-3400 • FAX: 909-396-3458

6 Attorneys for Petitioner
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
7

8 **BEFORE THE HEARING BOARD OF THE**
9 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**
10

11 **In The Matter Of**

12 SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

13 Petitioner,

14 vs.

15 LOS ANGELES CITY SANITATION
16 BUREAU, HYPERION TREATMENT
PLANT

17 [Facility ID No. 800214]

18 Respondent.
19

Case No. 1212-40

**DECLARATION OF JASON LOW IN
RESPONSE TO THE HEARING
BOARD'S INQUIRY**

Date: January 25, 2022
Time: 9:00 am
Place: Hearing Board
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

20
21
22
23
24
25
26
27
28

Declaration of Jason Low in Response to the Hearing Board's Inquiry
Hyperion Treatment Plant, Facility ID #800214

concentrations in air, at least 1,000 times below the level that would cause eye and lung irritation. [Learn More](#)

Regulatory Requirements

CAAQS: 30 ppb 1-Hour Average [Learn More](#)

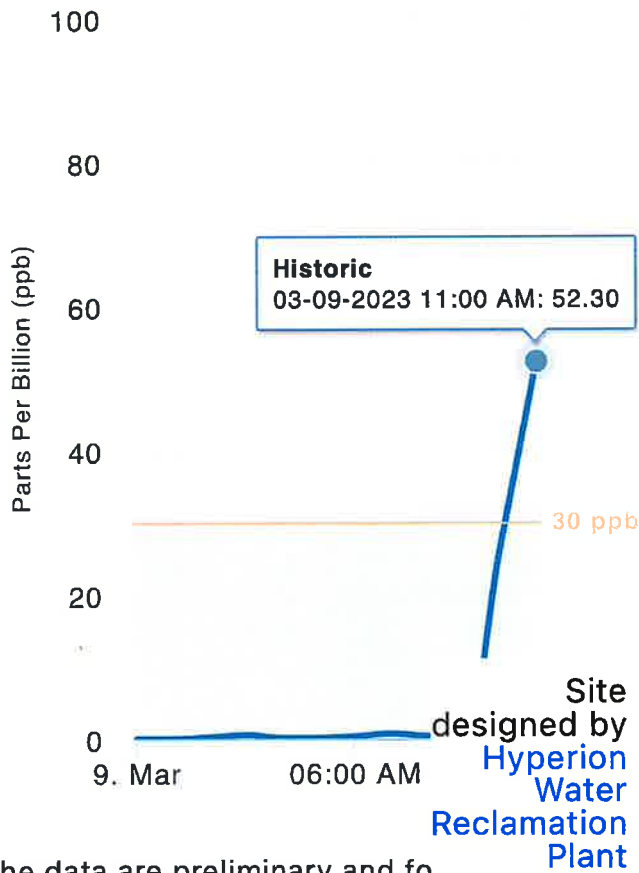
Date

Location

03/09/2023 ▲

South Monitor

H2S (PPB) 1-Hour Average



The data are preliminary and fo

BOARD MEETING DATE: October 2, 2020

AGENDA NO. 29

PROPOSAL: Receive and File 2019 Annual Report on AB 2588 Program and Approve Updates to Facility Prioritization Procedure for the AB 2588 Program, Public Notification Procedures, and AB 2588 and Rule 1402 Supplemental Guidelines

SYNOPSIS: The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) requires local air pollution control districts to prepare an annual report. The report provides the public with information regarding South Coast AQMD programs to reduce emissions of toxic air contaminants. This annual update describes the various activities in 2019 to satisfy the requirements of AB 2588 and Rule 1402, such as quadrennial emissions reporting and prioritization, the preparation and review of Air Toxics Inventory Reports, Health Risk Assessments, Voluntary Risk Reduction Plans, Risk Reduction Plans, and additional South Coast AQMD activities related to air toxics. Staff is also seeking approval of updates to the Facility Prioritization Procedure for the AB 2588 Program, Public Notification Procedures, and the AB 2588 and Rule 1402 Supplemental Guidelines to correct typographical errors and to provide additional information and clarification. These actions are to receive and file the 2019 Annual Report on the AB 2588 Air Toxics "Hot Spots" Program and approve revisions to the Facility Prioritization Procedure for the AB 2588 Program, Public Notification Procedures, AB 2588 and Rule 1402 Supplemental Guidelines.

COMMITTEE: Reviewed: Stationary Source Committee, September 18, 2020

RECOMMENDED ACTIONS:

1. Receive and File:
 - a. 2019 Annual Report on the AB 2588 Program.
2. Approve updates to the following guidance documents:
 - a. Facility Prioritization Procedure for the AB 2588 Program;
 - b. Public Notification Procedures; and
 - c. AB 2588 and Rule 1402 Supplemental Guidelines.

Wayne Nastri
Executive Officer

hyperion-declaration-of-dr-low-with-
exhibits-1-4

PDF Document - 4.9 MB

**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
21865 Copley Drive, Diamond Bar, CA 91765-4178

Section D	Page 44
Facility ID:	800214
Revision #:	12
Date:	August 27, 2019

**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).



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

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 M1000 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]



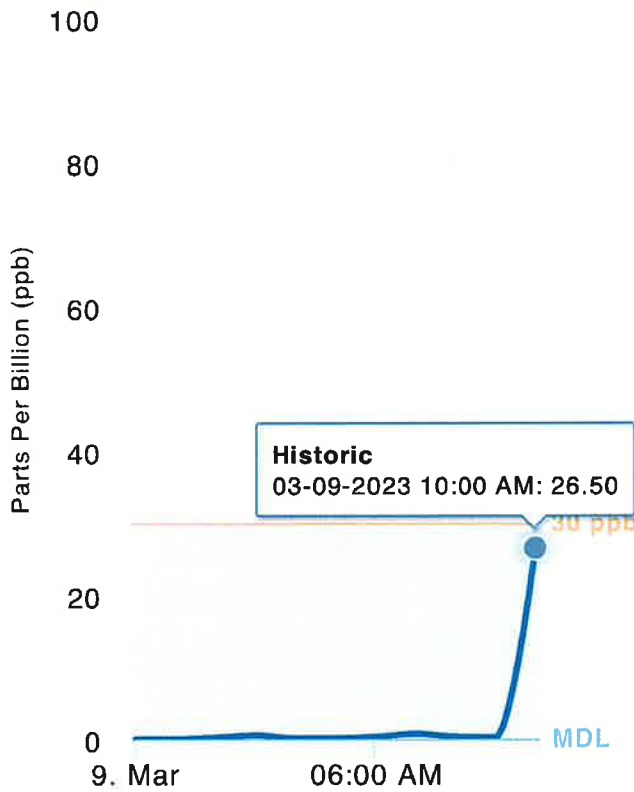
Date

Location

03/09/2023 ▲

South Monitor

H2S (PPB) 1-Hour Average



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

Site designed by
Hyperion Water Reclamation Plant

Potential Causes

AA 🔒 hyperion.sensibleiot.com ↻

Sent from my iPhone

Begin forwarded message:

From: Montrose Environmental on behalf of Hyperion Water Reclamation Plant
<lasan.cleanwater.outreach@lacity.org>
Date: March 9, 2023 at 11:06:13 AM PST
To: Corrie Zupo <corriezupo@gmail.com>
Subject: **Hydrogen Sulfide notification from Hyperion**
Reply-To: Montrose Environmental on behalf of Hyperion Water Reclamation Plant
<lasan.cleanwater.outreach@lacity.org>

[View this email in your browser](#)



Notification of elevated levels of hydrogen sulfide (H₂S)

[CLICK HERE TO VIEW THE DATA](#)

Notifications are provided via email to those who have signed up for them when the H2S levels at the fence line of the Hyperion Water Reclamation Plant have reached or exceeded 27 parts per billion (ppb). Note that this is below the [ambient standard](#) of 30 ppb set by the California Air Resources Board.

Please refer to the [LASAN website](#) for more information about the H2S levels and historical data. The Occupational Safety and Health Administration (OSHA) set an [exposure limit](#) for H2S at 10,000 ppb (10ppm) for 10 minutes.

If you have any questions, please feel free to email LASAN's Community Outreach Team at LASAN.CleanWater.Outreach@lacity.org. You can also call the El Segundo Neighborhood Hotline at 310-640-2489.

Copyright (C) 2023 LA Sanitation & Environment. All rights reserved.

You are receiving this email because you requested updates about odor control at Hyperion.

Our mailing address is:
LA Sanitation & Environment
Public Works Building
Los Angeles, CA 90015

[Add us to your address book](#)

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe](#)