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13 CITY OF LOS ANGELES

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

In the Matter of

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

Petitioner,

vs.

LOS ANGELES CITY SANITATION
BUREAU, HYPERION WATER
RECLAMATION PLANT

[Facility ID No. 800214]

Respondent.

Case No. 1212-40

STATUS REPORT

South Coast AQMD Rule 3002(c)(1)

Hearing Date: January 24, 2024
Time: 9:30 a.m.
Place: Hearing Board
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

1 Pursuant to the Findings and Decision dated July 26, 2023 (“Order for Abatement” or
2 “Order”) in the above-captioned matter Respondent City of Los Angeles, including its Hyperion
3 Water Reclamation Plant (“Respondent” or “HTP”) respectfully submits this status report. In this
4 status report, Respondent generally describes training for the Order of Abatement provided to all
5 relevant employees as well as communicates the status of completion of the primary chemical
6 scrubber refurbishment and in-service primary tank cover and seal replacement. In a separate
7 submission, Respondent addresses the relative contribution of fugitives as outlined in Yorke’s
8 December 2022 modeling analysis and provides an update on how such emissions will be addressed.

9 A. Training

10 On September 19, 2022, and again on December 19, 2023, Hyperion revised its Standard
11 Operating Procedure related to Notification Procedures for AQMD Reportable Incidents (“SOP”) to
12 comply with the Order for Abatement. Relevant Hyperion staff received training on this revised
13 SOP.

14 The SOP includes information for operator staff on such subjects as the notification
15 procedures generally; response and investigation of odor complaints; odor patrols; fenceline
16 monitoring/teledyne-related reporting and responses; odor scrubber equipment inspection and
17 reporting; reporting on incidents that might cause complaints of odors, noise, vibration, and dust;
18 reporting associated with primary tank cover removal; truck loading door requirements and
19 reporting. The SOP also addresses engineering staff responsibilities on the conditions of the Order
20 of Abatement, including odor complaint responses; Acrulog measurements; data from the teledyne
21 units and requirement of the spare unit; bar screen inspection and maintenance record submission;
22 reporting on temporary air pollution equipment on site; differential pressure gauge installation;
23 inspection and reporting associated with temporary covers; confined space entry logs; truck
24 loading training; response to elevated hydrogen sulfide reading, including root cause analysis and
25 notification requirements; use of portable air monitors and data related thereto; trunk sewer
26 monitoring, recording, and response; as well as submission of monthly reports to South Coast
27 AQMD.

1 The most recent training on the revised SOP took place over multiple days in
2 December 2023 (December 19, 2023, December 20, 2023, December 23, 2023, and
3 December 27, 2023) in which relevant staff were required to review the SOP as revised in full and
4 confirm their review and training. This training was in the form of what is referred to as “tailgate”
5 training. All shift superintendents and senior operators, who are the employees most likely staff to
6 come in contact with South Coast AQMD inspectors, were required to participate.

7 Related to the training by Hyperion’s consultant of relevant employees performing odor
8 patrols and H2S monitoring, Respondent incorporates by reference its status report provided in
9 advance of the hearing on January 23, 2023, in which Respondent confirmed such training took place
10 on November 3, 2022. The City has also since conducted semi-annual training and refresher training
11 of odor patrols consistent with Condition 2. The semi-annual training last took place on
12 May 23, 2023. The most recent refresher training took place over multiple days principally in
13 November 2023 (November 18, 2023, November 19, 2023, November 29, 2023, and
14 December 9, 2023).

15 B. Completion of scrubber refurbishment and in-service tank cover replacement

16 Respondent timely completed the primary chemical scrubber refurbishment (due on or before
17 September 30, 2023, pursuant to condition 28(c)) as well as completion of the primary tank covers
18 and seals for all in-service tanks (completion by December 31, 2023, pursuant to condition 37(b)).
19 For the scrubber refurbishment, Respondent provided courtesy notice of completion to the South
20 Coast AQMD inspector on September 29, 2023. The inspector requested further supporting
21 documentation of completion, which Respondent provided to him following receipt from the
22 contractor. The primary cover and seal replacement completion was communicated to the inspector
23 during his visit on site. Attached as Exhibit 1 hereto is a true and correct copy of correspondence
24 from the contractor related to completion of the primary tank cover and seal replacement for active,
25 in-service tanks.

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1 Respondent will be prepared to address the foregoing and respond to questions at the
2 upcoming hearing.

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4 DATED: January 12, 2024

5
6 CITY OF LOS ANGELES

7 By: Adena Hopenstand
8 Adena M. Hopenstand,
9 Deputy City Attorney
10 Virginia Choi
11 Deputy City Attorney
12 *Attorneys for Respondent,*
13 CITY OF LOS ANGELES
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EXHIBIT 1



Friday, January 5, 2024

Hyperion Water Reclamation Plant
12000 Vista del Mar
Playa del Rey, CA 90293

Attention: Sheri Symons

Regarding: Primary Battery B & C – Aluminum Cover Installation

Sheri,

Installation of the aluminum covers for Primary Battery B & C was successfully completed on December 22, 2023. The areas covered in both Battery B & C include Launderers, Scum Troughs, Maintenance Hatches, Sludge Hoppers & Influent Channel. All covers were installed in accordance with Hallsten's recommended installation procedures and all relevant shop drawings.

If you have any questions, please contact Hallsten Corporation at (800) 473-7440.

Sincerely,

A handwritten signature in blue ink that reads "Ron Kuehne". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ron Kuehne, PE
Vice President of Engineering