



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed Joint Water Pollution Control Plant Biogas Conditioning System (“Proposed Project”)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

On March 3, 2017, the SCAQMD’s Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP¹ is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment. Achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable.

SCAQMD staff understands that the proposed project will turn biogas into compressed natural gas (CNG) to be used as transportation fuel for trucks, buses, and other local fleet vehicles. SCAQMD staff believes that the generation of renewable natural gas as transportation fuel is consistent with the goals of the 2016 AQMP. This helps cut emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the Basin.

Project Description

The Lead Agency proposes to install a biogas conditioning system on 20,000 square feet within 220 acres. The proposed project will generate biogas from the co-digestion of food waste and sewage and will include the installation of three pipelines: (1) two 1,355-foot biogas supply pipelines; (2) a 2,375-foot tail gas return pipeline; and (3) a 550-foot water drainage pipeline. SCAQMD staff understands that the tail gas from the biogas conditioning system will be combusted in the Total Energy Facility or flared, and that liquid condensate from the proposed biogas conditioning system will be sent to the nearest sewer connection. The proposed project will take approximately seven months to construct starting in June 2018.

Air Quality Analysis

In the Air Quality section of the MND, the Lead Agency found that the proposed project’s regional operational air quality impacts would be less than significant. Based on a review of Table 5, *Summary of Peak Operational Emissions*, on Page 21 of the MND, SCAQMD staff found that the operational air

¹ South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

quality analysis did not estimate emissions generated from “new on-site stationary equipment, such as pumps and generators”². Therefore, SCAQMD staff recommends that the Lead Agency calculate emissions from the operation of on-site stationary source equipment and include them in the Final MND. In the event that the Lead Agency finds, after revising the air quality analysis, that the proposed project’s operational emissions would exceed SCAQMD’s regional daily CEQA significance thresholds³, SCAQMD staff recommends that the Lead Agency implement mitigation measures to reduce those impacts to the maximum extent feasible. Information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website⁴.

SCAQMD As A Responsible Agency

Since the proposed project will require the installation of new equipment and modification to the existing equipment, permits from SCAQMD will be required, and SCAQMD should be identified as a responsible agency for the proposed project in the MND. The proposed project will require the submittal of complete and timely permit applications to SCAQMD for the following installation and modification activities.

- The proposed installation of a food waste processing system (such as grinders, screeners, receiving/storage tanks, conveyors, etc.).
- The proposed modification to the existing digesters to allow for food waste feedstock.
- The proposed installation of the biogas conditioning system.
- The proposed modification to the Total Energy Facility (three cogeneration systems) to allow for combustion of biogas conditioning system waste (tail) gas.
- The proposed modification to the existing flare stations to allow for combustion of biogas conditioning system waste (tail) gas.

For general information on permits, please visit the SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Permit questions can be directed to SCAQMD Engineering and Permitting staff at (909) 396-2737.

SCAQMD Rules & Regulations

Based on a review of the MND (Page 22), SCAQMD staff found that the Lead Agency discussed compliance with SCAQMD Rule 403 (Fugitive Dust) and Rule 1303 (New Source Review Requirements). The Lead Agency should include a discussion in the Final MND to demonstrate compliance with the following SCAQMD rules and regulations:

- Rule 212 – Standards for Approving Permits and Issuing Public Notices
- Rule 401 – Visible Emissions
- Rule 402 – Nuisance
- Rule 1401 – New Source Review of Toxic Air Contaminants

Conclusion

In closing, SCAQMD staff supports the use of renewable natural gas as transportation fuel. This can benefit air quality and ensure that the Basin is on track to attain the NAAQS. Pursuant to the CEQA Guidelines Section 15074, prior to approving the proposed project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD staff with written responses to all comments contained herein prior to the adoption of

² MND. Page 25.

³ South Coast Air Quality Management District. *SCAQMD Air Quality Significance Thresholds*. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

the Final MND. SCAQMD staff is available to work with the Lead Agency to address the issues that may arise from this letter. Please contact Gordon Mize, Air Quality Specialist – CEQA IGR Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AS/GM

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