



South Coast Air Quality Management District

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SENT VIA E-MAIL:

September 30, 2020

ekrause@glendaleca.gov

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633 East Broadway, Suite 103
Glendale, California 91206

Draft Environmental Impact Report (Draft EIR) for the Biogas Renewable Generation Project (Proposed Project) (SCH No.: 2017081062)

South Coast Air Quality Management District (South Coast AQMD) is a Responsible Agency for the Proposed Project [California Environmental Quality Act (CEQA) Guidelines Section 15381] since implementation of the Proposed Project requires permits from South Coast AQMD. In 2017, South Coast AQMD received 11 permit applications [Application Numbers (A/N): 595659, 595660, 595661, 595662, 595663, 595664, 595665, 595666, 595667, 595669, and 595670] related to the Proposed Project (South Coast AQMD Facility ID No.: 162556).

South Coast AQMD staff understands that the City of Glendale as the CEQA Lead Agency for the Proposed Project is relying on the air quality analysis in the Draft EIR to satisfy the CEQA requirements for these permits, and it is generally the same air quality analysis that was done in the previously released Mitigated Negative Declaration (MND). South Coast AQMD staff previously submitted comments on the MND put forward by the Lead Agency in October 2017 for the Proposed Project¹, which involved a 12-megawatt power generation facility that would utilize landfill gas (LFG) as fuel to generate renewable energy. In March 2019, the Lead Agency initiated the preparation of a Draft EIR for the Proposed Project and released the Draft EIR for public review and comments in July 2020.

Based on a review of the Draft EIR, supporting technical documents, and permit applications for the Proposed Project, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details in Attachment A. Additionally, the Draft EIR did not fully respond to or address South Coast AQMD staff's comments in the submitted comment letter on the MND, which is incorporated by reference in Attachment B.

1. CEQA Air Quality and Health Risk Impacts from the Regenerative Gas Flare: The Lead Agency submitted a permit application (A/N: 595670) for a flare that would incinerate regenerative off-gases, which result from the LFG treatment system and occur prior to combusting LFG in the reciprocal engine generators to generate electricity. The Lead Agency did not analyze the air quality impacts from the regenerative gas flare in the Draft EIR and should include the analysis in the Final EIR. Without this analysis, South Coast AQMD will not be able to issue the permit for this flare.

¹ South Coast AQMD staff. October 17, 2017. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2017/mnd-schollcanyon-101717.pdf>.

2. Worker Receptor Locations for the Health Risk Assessment: The health risk assessment in the Draft EIR did not include the workers located within the Scholl Canyon Landfill site as a receptor. The Proposed Project is located on a 2.2-acre portion of the 95-acre Scholl Canyon Landfill site that includes operations of four other South Coast AQMD-permitted facilities, each with a different facility identification number. Workers at these other facilities are considered worker receptors because they work at separate facilities, different from the workers at the Proposed Project. Therefore, the Lead Agency should analyze the Proposed Project's health risk impacts to the workers located within the Scholl Canyon Landfill site in the Final EIR.
3. Air Dispersion Modeling Parameters: The background concentrations used to determine the ambient air quality at the Proposed Project were from years 2014 to 2018. The background concentrations during this time period were not a true representation of the existing conditions since LFG used to be sent to the Grayson Power Plant to burn in boilers before April 1, 2018, and the first full year of combusting LFG at the Scholl Canyon Landfill site was in year 2019. Therefore, the Final EIR should include the use of 2019 air quality data as background. Additionally, in the air dispersion modeling performed in the Draft EIR, the facility boundary included the area for a publicly accessible park and should be adjusted to exclude that area in the Final EIR.

In conclusion, the Draft EIR did not analyze the air quality and health risk impacts from the regenerative gas flare, which is a part of the Proposed Project, and likely underestimated the health risk impacts to workers employed by other South Coast AQMD-permitted facilities at the Scholl Canyon Landfill site. South Coast AQMD staff recommends that the Lead Agency revise the analysis in the Final EIR to correct the deficiency and lack of analysis of the regenerative gas flare, and revise the health risk assessment and air dispersion modeling to fully disclose the Proposed Project's air quality and health risk impacts.

In its current form, the Draft EIR is not adequate for South Coast AQMD's use in issuing the associated air quality permits and the Final EIR needs to fully address the deficiencies identified in this comment letter. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please feel free to contact me at lsun@aqmd.gov, if you have questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachments:

Attachment A – South Coast AQMD staff's detailed comments on the Draft EIR

Attachment B – South Coast AQMD staff's comments on the previously released MND, dated October 17, 2017

LAC200708-27

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ATTACHMENT A**South Coast AQMD Staff's Detailed Comments on the Draft EIR****South Coast AQMD Staff's Summary of Project Description in the Draft EIR**

The Lead Agency is proposing to demolish existing landfill gas treatment equipment and build a 12-megawatt power generation facility that would utilize landfill gas (LFG) as fuel to generate renewable energy (Proposed Project). The Proposed Project will also include a one-mile natural gas pipeline, a one-mile water pipeline, two 70,000-gallon water tanks, and an LFG treatment system. The Proposed Project is located on a 2.2-acre portion of the 95-acre Scholl Canyon Landfill site that is owned by Los Angeles County within the City of Glendale.

In addition to the Proposed Project (South Coast AQMD Facility ID No.: 162556), four other South Coast AQMD-permitted facilities operate at the Scholl Canyon Landfill site². Each has a separate facility identification number (South Coast AQMD Facility ID Nos.: 37361, 45262, 103426, and 192443) that is different from that of the Proposed Project. Existing operations at the Proposed Project include collection, incineration, and flaring of LFG by the Los Angeles County Sanitation District (South Coast AQMD Facility ID No.: 45262)³.

The Proposed Project will be constructed in three phases over a 15- to 18-month period. Once operational, the Proposed Project will include four reciprocating internal combustion engines (RICEs), four selective catalytic reduction (SCRs) systems, a regeneration ground flare, an LFG treatment system, and an aqueous ammonia storage and transfer system⁴. South Coast AQMD staff understands that existing on-site flare stacks will not be demolished and will likely be used intermittently as backup devices to incinerate and flare LFG not utilized by the Proposed Project⁵. The life of the Proposed Project is anticipated to be 20 years, or as long as LFG can be used to generate electricity⁶.

South Coast AQMD Staff's Summary of Permit Applications

South Coast AQMD received 11 permit applications for the Proposed Project. The Proposed Project will take raw LFG from the existing Scholl Canyon Landfill and send it through an LFG treatment system where the regenerative off-gases from the treatment process will be sent to a regenerative flare to be incinerated. Treated LFG will then be sent to four RICEs to generate electricity (Figure 1). Each RICE will be equipped with an SCR and oxidation catalyst unit using aqueous ammonia and oxygen to minimize the emissions of nitrogen oxides (NOx) emissions (Table 1).

² South Coast AQMD. Facility Information Detail (F.I.N.D). Accessed at: <http://www.aqmd.gov/nav/FIND>.

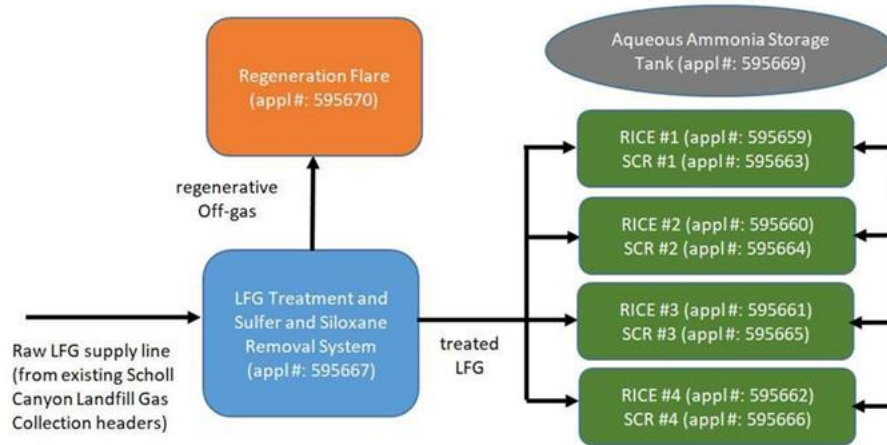
³ Draft EIR. Section 2.0. Page 2.1.

⁴ *Ibid.* Pages 2.5 to 2.7.

⁵ *Ibid.* Section 4.2. Page 4.61.

⁶ *Ibid.* Page 2.17.

Figure 1 – Process Flow Chart*



NOTE: *appl# stands for South Coast AQMD permit application number
Prepared by South Coast AQMD staff. September 17, 2019.

Table 1 – Brief Descriptions of the South Coast AQMD Permit Applications related to the Proposed Project

	Application Number	Proposed Equipment and Process	Brief Description
1	595659	Construction and operation of a 4,183-horsepower RICE #1	Operate 24 hours per day, seven days per week using LFG as fuel, augmented by natural gas as an additional fuel source at a maximum of 10 percent
2	595660	Construction and operation of a 4,183-horsepower RICE #2	Same as RICE #1
3	595661	Construction and operation of a 4,183-horsepower RICE #3	Same as RICE #1
4	595662	Construction and operation of a 4,183-horsepower RICE #4	Same as RICE #1
5	595663	SCR #1	A homogenous honeycomb selective catalytic reduction unit that would operate 24 hours per day, seven days per week using a 19 percent aqueous ammonia solution as a reducing agent. A homogenous honeycomb oxidation catalyst is also proposed.
6	595664	SCR #2	Same as SCR #1
7	595665	SCR #3	Same as SCR #1
8	595666	SCR #4	Same as SCR #1
9	595667	LFG treatment and sulfur and siloxane removal system	It consists of vessels containing media that capture the sulfur/siloxane and remove it from the LFG
10	595669	Aqueous ammonia storage tank	An aboveground aqueous ammonia storage and transfer system that would hold a 19 percent aqueous ammonia solution
11	595670	Regeneration flare	A landfill and digester gas fired flare (non-emergency, enclosed) that is not used to combust LFG but is used for the LFG from the cleanup skids

South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment in the Draft EIR

In the Air Quality Analysis Section of the Draft EIR, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional and localized construction air quality impacts would be less than significant⁷. The Proposed Project's net new regional operational emissions of NO_x and volatile organic compounds (VOCs) would be reduced to below South Coast AQMD's regional air quality CEQA significance thresholds for operation with allocation of emissions offsets issued from the Priority Reserve⁸. However, the Proposed Project's regional operational emissions of carbon monoxide (CO) cannot be reduced to less than significant with allocation of emissions offsets issued from the Priority Reserve and would remain significant and unavoidable. The Lead Agency also quantified health risks from the operation of the RICEs on resident and worker receptors located outside the Scholl Canyon Landfill site. The maximum individual cancer risk would be less than 1 in a million⁹, which is below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk.

South Coast AQMD Staff's Detailed Comments on the Draft EIR

South Coast AQMD staff's detailed comments on the Draft EIR's air quality analysis and health risk assessment are provided as follows.

1. CEQA Air Quality and Health Risk Impacts from the Regenerative Gas Flare

As shown in Table 1, South Coast AQMD received the permit application (A/N: 595670) for the regenerative gas flare. The Lead Agency identified the need for the regenerative gas flare to incinerate off-gases from the LFG sulfur and siloxane removal system in the MND¹⁰, submitted this permit application in 2017, and provided South Coast AQMD staff information about this flare¹¹. At the time of the release of the Draft EIR, the Lead Agency did not withdraw or make any changes to the permit application (A/N: 595670). Therefore, the regenerative gas flare is a component of the Proposed Project.

The regenerative gas flare is a landfill and digester gas fired flare. As illustrated in Figure 1, the Proposed Project would include an LFG treatment system that uses carbon absorbers that are periodically regenerated and vented to the new regenerative gas flare. According to the South Coast AQMD permit application (A/N: 595670), flaring of regenerative off-gases will take place eight hours a day, four days a week, and 52 weeks a year.

Although the Draft EIR discusses the use of a ground flare to dispose the regeneration gas, the Lead Agency did not fully describe the regenerative gas flare in the Project Description or analyze the associated air quality and health risk impacts in the Draft EIR. Regenerative off-gases will be generated from implementation of the Proposed Project's LFG treatment system and are not currently being flared. The regenerative gas flare is also different from the exiting

⁷ *Ibid* Pages 4.56 to 4.59.

⁸ *Ibid.* Pages 4.61 to 4.63.

⁹ *Ibid.* Page 4.101.

¹⁰ MND. 2017. Section 3.3 Air Quality. Page 3.3.22. Accessed at: <http://glendalebiogasgeneration.com/#final-mnd>.

¹¹ E-mail correspondence. October 2017. From Montrose (Lead Agency's consultant) to South Coast AQMD staff.

LFG flares because the LFG treatment system that produces regenerative off-gases is undertaken and completed prior to combusting the LFG in the reciprocating engine generators. Therefore, the regenerative gas flare should not be treated as part of the existing conditions and its air quality and health risk impacts should be adequately analyzed and fully disclosed in the Final EIR before the permit for this flare can be issued.

2. Worker Receptor Locations for the Health Risk Assessment

Based on a review of the air dispersion modeling files, South Coast AQMD staff found that the Lead Agency did not place any worker receptors within the Scholl Canyon Landfill site. This is not appropriate. The Proposed Project is located on a 2.2-acre portion of Scholl Canyon Landfill site that encompasses 95 acres and includes operations of four other South Coast AQMD-permitted facilities, each with a different facility identification number. While the fence line notes the areas which are considered ambient air due to public access restrictions, workers at these other facilities are not considered on-site workers for the Proposed Project and should be analyzed as worker receptors. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air dispersion modeling to place worker receptors at the locations of other South Coast AQMD-permitted facilities within the Scholl Canyon Landfill site, calculate the cancer risk to the workers at these locations, and compare the calculated cancer risk to South Coast AQMD's CEQA significance threshold of 10 in one million to determine the level of significance in the Final EIR.

3. Air Dispersion Modeling Parameters

To analyze the Proposed Project's localized operational air quality and health risk impacts, the Lead Agency performed air dispersion modeling in the Draft EIR. South Coast AQMD staff recommends that the Lead Agency revise the modeling parameters based on the following comments.

- a) Background concentrations are added to the project's predicted air quality concentrations and CEQA significance is based on whether the total concentration will result in a violation of the National Ambient Air Quality Standards (NAAQS), or make an existing violation of the NAAQS worse. In the Draft EIR, the Lead Agency used the background concentrations from years 2014 to 2018¹². During this time period, the Lead Agency sent LFG to the Grayson Power Plant (Grayson) to burn in boilers. Since April 1, 2018, the Lead Agency ceased combusting LFG at Grayson and has been flaring all LFG at the Scholl Canyon Landfill site¹³. Background concentrations from years 2014 to 2018 do not provide an accurate depiction of the existing condition at the time of the release of the Notice of Preparation in 2019 since the first full year of combusting all LFG at the Scholl Canyon Landfill was in year 2019. Therefore, to accurately characterize the Proposed Project's ambient air quality impacts, South Coast AQMD staff recommends that the Lead Agency update the analysis in the Final EIR using the 2019 air quality data¹⁴ as background.

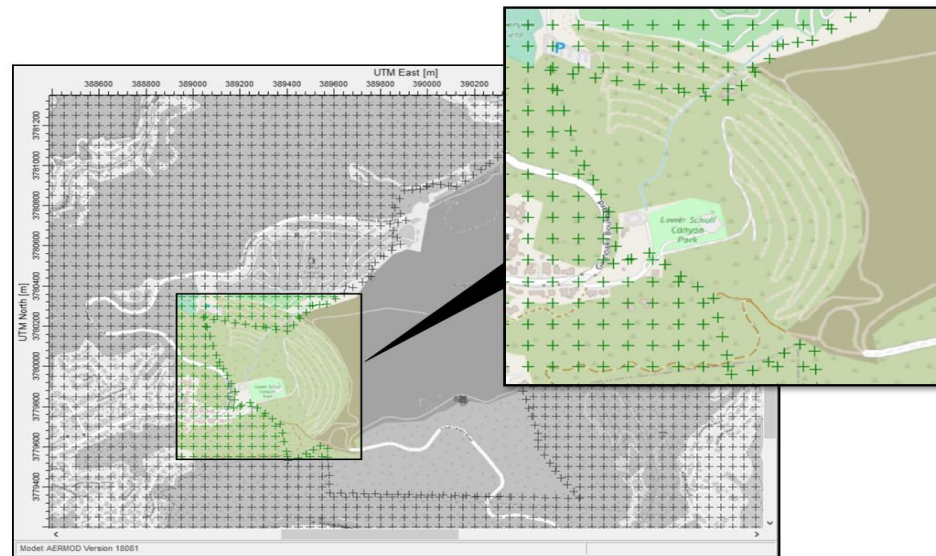
¹² Draft EIR. Section 4.2. Page 4.64.

¹³ *Ibid.* Section 2.0. Page 2.1.

¹⁴ South Coast AQMD. Historical Data by Year. Accessed at <http://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year>.

- b) As illustrated in Figure 2, the facility boundary used in the air dispersion model includes an area for the Lower Scholl Canyon Park (Park). As such, no sensitive receptors (denoted by the green “+” symbols) were placed within the Park boundary. This is not appropriate. The Park has three picnic structures, two playgrounds, and a public parking lot¹⁵. Because the general public has access to the Park, receptors should have been placed within the Park as it is considered to be ambient air. As such, South Coast AQMD staff recommends that the Lead Agency revise the facility boundary in the air dispersion modeling to exclude the area for the Lower Scholl Canyon Park from the facility boundary.

Figure 2 – Illustration of Facility Boundary in Air Dispersion Model



Source: South Coast AQMD staff prepared a screenshot of Lead Agency’s air dispersion model (1-hour NO₂ Run) to illustrate the facility boundary used in AERMOD. September 25, 2020.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

¹⁵ City of Glendale Park Locator. Accessed at: <https://glendalegeo.maps.arcgis.com/apps/webappviewer/index.html?id=0cf792023dfd4cd7a54d2b4b1dcae164>.

ATTACHMENT B

South Coast AQMD Staff's Comments on the Previously Released Mitigated Negative Declaration, Dated October 17, 2017



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

October 17, 2017

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Dennis Joe, Planner
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633 East Broadway, Room 103
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Mitigated Negative Declaration (MND) for the Proposed Biogas Renewable Generation Project

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

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish the existing landfill gas collection system and construct and operate an approximately 12-megawatt power generation facility that would utilize landfill gas as a fuel to generate renewable energy (Proposed Project).

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality analysis, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be less than significant and that the Proposed Project's operational emissions of NOx and VOCs would be offset through the allocations from the SCAQMD Priority Reserve Credits¹. The Lead Agency stated that "since construction and operation of a landfill gas processing facility is considered to be an essential public service, Priority Reserve credits are expected to be granted for this Project pursuant to SCAQMD Rule 1309.1 for pollutants that exceed small source thresholds"².

SCAQMD Staff's Comments

SCAQMD staff has comments about the air quality cumulative impacts analysis, energy input rating, compliance with SCAQMD Rules, and SCAQMD permits. Comments are provided as follows.

Air Quality Cumulative Impacts Analysis

The Lead Agency considered the potential cumulative air impacts from the Grayson Power Plant Repowering project³. However, the Lead Agency did not consider how the Proposed Project's air quality impacts would be cumulatively affected when it is combined with the air quality impacts from the proposed Scholl Canyon Landfill Expansion project (SCH No. 2007121023). In the cumulative impacts analysis for noise, the Lead Agency found that the proposed Scholl Canyon Landfill Expansion project could cumulatively affect a nearby sensitive receptor for noise exposures⁴. Similarly, the Lead Agency found that implementation of the Proposed Project may overlap with implementation of the proposed School Canyon Landfill Expansion project causing an incremental cumulative increase in vehicle traffic at the intersections of Figueroa Street and Highway 134 ramps⁵. Therefore, to be consistent with cumulative impact analyses for noise and transportation and traffic, SCAQMD staff recommends that the

¹ MND. Page 3.3.17

² MND. Page 3.3.13.

³ MND. Page 3.19.3.

⁴ MND. Page 3.19.5

⁵ MND. Page 3.19.6.

Lead Agency disclose the potential incremental impacts on air quality from the proposed School Canyon Landfill Expansion project in the Final MND.

Energy Input Rating

The criteria and toxic emissions from the Internal Combustion Engines/Cogeneration system (ICE/Cogens) is based on an energy input rating of 26.34 mmbtu/hr⁶ even though the manufacturer's specified maximum energy input is rated at 23.9 mmbtu/hr⁷. Additionally, the total greenhouse gas emissions of 48,427 MT/year⁸ of CO₂e was based on the input rating of 95.14 mmbtu/hr, which was about four times the manufacturer's rating of 23.9 mmbtu/hr per engine. SCAQMD staff recommends that the Lead Agency revise the Air Quality analysis by using one energy input rating consistent throughout the Final MND and associated appendices.

Compliance with SCAQMD Rules

Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing

Since the Proposed Project includes the abandonment of existing landfill gas pipeline from Scholl Canyon Landfill to Grayson Power Plant, SCAQMD staff recommends including a discussion to demonstrate compliance with Rule 1149 in the Final MND.

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

The scope of work and asbestos survey at this time indicates that the existing temporary/portable offices and landfill condensate/groundwater collection systems will not be disturbed, therefore are not included in the pre-demolition asbestos survey. If plans change and any of these facilities are renovated or demolished, the asbestos survey⁹ will need to be amended to include any additional structures or facility components. A 10-working day notification before any demolition or renovation activities other than emergency demolition or renovation is required pursuant to Rule 1403.

Rule 1150.1 – Control of Gaseous Emissions From Municipal Solid Waste Landfills

Since the Proposed Project involves demolition and construction of a landfill gas combustion system, SCAQMD staff recommends that the Lead Agency ensure that the Proposed Project is consistent with the Rule 1150.1 Alternative Compliance Plan.

California Code of Regulation Title 13, Division 3, Chapter 9, Article 5 – Portable Engine and Equipment Registration

Portable equipment brought onsite must be registered with California Air Resources Board under the Portable Equipment Registration Program (PERP) and may not reside on the facility for greater than one year without a Permit to Operate from SCAQMD. Notification to SCAQMD of PERP equipment is required.

SCAQMD Permits

Based on SCAQMD staff's review of the MND, it is foreseeable that Lead Agency will rely on the adopted MND to demonstrate CEQA compliance for the Proposed Project's permits from SCAQMD. Therefore, it is critical that the information in the permit applications filed with SCAQMD for the Internal Combustion Engines/Cogeneration system (ICE/Cogens) and associated Selective Catalytic Reduction equipment are consistent with the assumptions used in the Air Quality analysis in the MND. Moreover, since SCAQMD permits are required, SCAQMD should be identified as a Responsible Agency for the

⁶ Appendix A.2.3. Page 364.

⁷ Page 377.

⁸ Table 3.7-3. Page 156.

⁹ Appendix G – Pre-Demolition Asbestos and Lead-Based Paint Survey

Dennis Joe

October 17, 2017

Proposed Project in the MND. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. For any questions on permits, please contact Mr. Ken Matsuda, Senior Air Quality Engineer, at KMatsuda@aqmd.gov or at (909) 396-2656.

Pursuant to 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. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

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Control Number