

FORTISTAR Methane Group

MM West Covina LLC

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June 4, 2020

Alberto Jasso
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Subject: Risk Reduction Plan
MM West Covina Energy LLC
SCAQMD Facility ID: 113873

Dear Mr. Jasso;

Please see attached Risk Reduction Plan (RRP) submitted by MM West Covina Energy LLC. I am certifying that this RRP meets the requirements of South Coast Air Quality Management District Rule 1402(f)(3) and that I am responsible for the process and operation of the MM West Covina facility.

If you have any questions or require additional information, please contact Suparna Chakladar at schakladar@fortistar.com or (951) 833-4153.

Sincerely,



Anthony J. Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
MM West Covina LLC

Enclosure

cc: Suparna Chakladar, FMG

MM West Covina Energy LLC (SCAQMD Facility ID: 113873)

Risk Reduction Plan

Facility Name and Description:

West Covina Energy LLC (Facility) generates electricity by routing landfill gas (LFG) generated at the BKK Landfill (Landfill) to a boiler. The boiler generates steam which drives a turbine to generate electricity. BKK Landfill is not owned by MM West Covina LLC. The Facility is located completely within the Landfill property line. The Facility occupies approximately 1.2 acres which is delineated by the lease line. This Facility has one emission source, SV001: Boiler Stack.

Standard Industrial Code (SIC): 4911

North American Industry Classification System (NAICS) code: 221118

Risk Characterization:

The Facility prepared a Health Risk Assessment (HRA) following the South Coast Air Quality Management District (SCAQMD) "AB2588 and Rule 1402 Supplemental Guidelines" for inventory year 2014 (Main HRA). The HRA evaluates cancer risk, chronic non-cancer hazard and acute non-cancer hazard at various receptors and includes emissions from all the compounds exactly as specified in the approved ATIR for the Facility. Emission rates of the substances from the 2014 Air Toxics Emission Inventory (ATIR) were approved by South Coast Air Quality Management District (SCAQMD) on August 29, 2017. The approved ATIR includes emissions of dioxin and furan compounds at a significantly higher emission rate than what has subsequently been demonstrated to be emitted by stack test results. This Main HRA was submitted to SCAQMD on July 2, 2018 and was subsequently revised per SCAQMD comments.

Cancer risk at the point of maximum impact (PMI) was estimated to be 284.3 in-a-million. Since there is no residence at the PMI, even though the cancer risk is greater than 100 in-a-million, MEIR value was considered for determining public notification and risk reduction level determination. Cancer risk at the MEIR was estimated to be 67.2 in-a-million at a receptor placed at the closest residence from the source. Because cancer risk at the MEIR is more than 25 in-a-million, a risk reduction plan is required as per SCAQMD Rule 1402.

Identification of source from which risk needs to be reduced in order to achieve a risk below Rule 1402 Action Risk Levels:

As explained above, the risk is contributed mainly from dioxin and furan compounds that were assumed to be at levels much higher than present in the site specific landfill gas. The emission factors for dioxin and furan compounds used in the Main HRA was standard published emission factors used in regulatory documents. To reduce the risk below Rule 1402 thresholds, the actual emissions of dioxin and furan compounds were measured during a stack test.

Risk Reduction Measures:

The excess risk at the Facility recorded in the Main HRA was a result of using emission factors for dioxin and furan compounds that are significantly higher than actual emissions. A subsequent Alternate HRA

was prepared with actual measurement of dioxin and furan compounds emitted during a stack test that was conducted by the Facility on August 10, 2018. In SCAQMD guidance documents, among available options to calculate emission factors, the stack test results are the most preferred and accurate measure of calculating emission factors.

Cancer risk at the point of maximum impact (PMI) was estimated to be 56.25 in-a-million. Since there is no residence at the PMI, even though the cancer risk is greater than 25 in-a-million, no risk reduction plan is required. Cancer risk at the MEIR is estimated to be 13.3 in-a-million at a receptor placed at the closest residence from the source, which is below 25 in-a-million. Thus a Risk Reduction Plan is not required. Because cancer risk at the MEIR is more than 10 in-a-million, a public notice was required. A public meeting was held on May 19, 2020 to discuss the impacts of the Main and Alternate HRA.

The facility has submitted the Alternate HRA as a risk reduction measure thus demonstrating compliance with the regulatory thresholds of Rule 1402.

Conclusion:

The risks identified in the Main HRA were mitigated by recalculating risk at the facility using actual emissions of dioxins and furans measured during a stack test conducted in August 2017. These results, documented in the Alternate HRA, indicates that the facility is in compliance and no further risk reduction is needed at the facility.

Attachments:

- Main HRA submitted to SCAQMD on January 27, 2020
- Alternate HRA submitted to SCAQMD on January 27, 2020