



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: MARCH 8, 2007

March 8, 2007

Mr. Glenn Acosta
County Sanitation District of Los Angeles
Planning Section
1955 Workman Mill Road
Whittier, CA 90601

Dear Mr. Acosta:

**Negative Declaration for Calabasas Landfill Gas-to-Energy Facility
(February 2007)**

The South Coast Air Quality Management District (SCAQMD) 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 in the final Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Negative Declaration. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.,
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS: CB

LAC070208-02
Control Number

Negative Declaration (ND) for Calabasas Landfill Gas-to-Energy Facility (February 2007)

Project Construction Emissions:

The lead agency states on page nine of the ND that construction emissions are temporary and less than significant. Please note that designations of nonattainment are based on daily exceedances of an ambient air quality standard. Consequently, whether or not emissions are temporary is irrelevant to determining air quality significance.

Exhibit 9 provides emissions for all the construction equipment combined without showing the number and types of construction equipment used. Exhibit 9 also does not provide the emission factors, methodology or equations used to generate the summary table. SCAQMD staff cannot therefore confirm the lead agency's construction emissions results. Please provide a table showing emissions per day per criteria pollutant for each of the construction equipment listed in the Final ND.

Localized Impacts (Significance Thresholds) (LST) Analysis

Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented to protect the health of nearby sensitive receptors. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html.

The SCAQMD recommends that an LST analysis be prepared for construction and operation, as necessary. In the case of the proposed project, modeling is required pursuant to SCAQMD Rule 1303(b)(1) for operational emissions from the gas turbines. This modeling would also satisfy the recommendation to perform an LST analysis and should have been reported in the ND.

Health Risk Assessments

- The HRA states that emissions are based on a source test for a Solar Turbine at the Puente Hills Landfill. There are two Tables C-1 in the HRA. The first Table C-1 lists emission rates; the second Table C-1 presents carcinogenic health risk. However, the pollutants listed on the two tables do not match. The source test is not included with the HRA, nor is a complete reference for the source test provided. The Final HRA should include a summary table from the Puente Hills Landfill source test demonstrate that the source test is representative of the proposed turbines and a detailed reference is provided for verification.

- It is not clear from the HRA that the proposed turbines are the same model and use similar landfill gas to the Puente Hills Landfill turbines. Without further information, the toxic emissions cannot be verified. The Final HRA should demonstrate that the turbine and landfill gas are similar enough for the Puente Hills Landfill turbine source test to be used as a surrogate for the proposed turbines.

Calculation of Inhalation Health Risk

Cancer Risks

Below is a procedure for estimating the inhalation cancer risk. Impacts to residential and worker exposures are addressed. The methods below represent a Tier-1 assessment as described by OEHHA.^[5]

The inhalation cancer risk equation is as follows:

$$\text{Cancer risk} = \text{Cancer Potency (CP)} \cdot \text{Inhalation Dose (Dose-Inh)}$$

$$\text{Dose-Inh} = 10^{-6} \cdot C_{\text{air}} \cdot \text{DBR} \cdot (\text{EF} \cdot \text{ED})/\text{AT}$$

Where,

CP	= Cancer potency; the cancer potency, mg/kg-day;
Dose-inh	= Dose through inhalation (mg/kg-day);
10^{-6}	= Unit conversion factor;
C_{air}	= Model-estimated DPM concentration ($\mu\text{g}/\text{m}^3$);
DBR	= Daily breathing rate (L/kg-day);
EF	= Exposure frequency (days/year);
ED	= Exposure duration (years); and
AT	= Averaging time period over which exposure is averaged, in days.

Assumptions for the above parameters are given in the table below:

Receptor	DBR	EF	ED	AT
Residential	302*	350	70	25,550
Worker	149	245	40	25,550

* 80th percentile breathing rate per ARB's interim risk management guidance for inhalation risk at residential receptors.^[12]

Non-cancer Risks

The relationship for the non-cancer health effects is given by the following equation:

$$\text{HI} = C_{\text{air}}/\text{REL}$$

where,

HI	Hazard Index; an expression of the potential for non-cancer health effects.
C_{air}	Annual average concentration ($\mu\text{g}/\text{m}^3$) for chronic health risk, maximum 1-hour concentration ($\mu\text{g}/\text{m}^3$) for acute health risk.
REL	Reference exposure level (REL); the concentration at which no adverse health effects are anticipated.