



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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JAMES F. STAHL  
*Chief Engineer and General Manager*

December 1, 2006

Mr. Joe Cassmassi  
South Coast Air Quality  
Management District  
21865 E. Copley Drive  
Diamond Bar, CA 91765

Dear Mr. Cassmassi:

## 2007 AQMP Comments

Thank you for the opportunity to comment on the draft 2007 AQMP. The Sanitation Districts have a few brief comments at this stage in the development of the document. We await the more detailed numerical analysis for over thirty measures coming in the next version of the plan as well as the socio-economic report.

### Stationary Source Control Measures

- a) MCS-01 Facility Modernization: In essence, this measure would require that existing equipment be upgraded to BACT levels or use supercompliant materials at the end of some pre-determined lifespan. We see a potential conflict with this measure and with the developing thinking on climate change regulation. We caution the District to review the BACT determinations particularly those established on combustion equipment. In several determinations, containing large numbers of permitted equipment, fuel efficiency was not considered i.e., reduced NO<sub>x</sub> from a boiler, for example, was the goal and the only goal of the BACT listing, several times at the expense of boiler fuel efficiency. In some cases the BACT level might have to be slightly adjusted so that *both* energy and pollutant mass can be optimized to obtain AQMP objectives.
- b) MCS-06 Improved Startup, Shutdown and Turnaround Procedures: As technology becomes increasingly more complicated and widespread, it is inevitable that it will occasionally breakdown. Requiring startup, shutdown and malfunction plans (SSMs) along the lines of the SSMs of 40 CFR Parts 63 and 65 is much more effective and preferable to rules with unreasonable timeframes or actions that take operating staff away from operating. Any rulemaking should also be cognizant that technologies that otherwise are suitable for natural gas, may not be suitable for landfill and digester gas combustion.
- c) LTM-04 Concurrent Reductions from Global Warming Strategies: The Initial Study for the Draft EIR for the 2007 AQMP acknowledges that achieving AB32 greenhouse gas reduction targets would require significant development and

implementation of energy efficiency technologies and extensive shifting of energy production to renewable sources. The Sanitation Districts are concerned that renewable power generation alternatives may run afoul of the District's distributed generation (DG) proposals. We are carefully following these developments.

**General Comments**

- a) Bump-Up Request (Executive Summary- Page 11): Perhaps there should be a pro/con analysis of all the ramifications of a bump-up request in one consolidated section of the AQMP. This analysis would include a timing analysis of when to request the bump-up, an analysis of how the emissions burden would be allocated to the various source categories under each scenario, an analysis of the jurisdictional authority under each scenario, an analysis of the approximate costs in each case and an analysis of the qualitative aspects of the potential action.
  
- b) AQMP Credit for All Emissions Reductions Resulting from Funding or Incentive Programs of Any Kind: It would be informative if a chart were prepared showing the monies spent from various AQMD or state programs such as any AQIPs, Rule 1122 monies, Rule 1309.1 monies etc., and the emissions reductions associated with those expenditures along with a determination of whether or not those emissions reductions are creditable to the AQMP. Other emissions reducing projects, even if not funded by District monies, but still resulting in reduced emissions in the Basin, like the Freeway Service Patrol, should also be identified and tallied up.

Thank you for the opportunity to comment and for the informative public information briefings around the four county areas.

Very truly yours,  
James F. Stahl

*Gregory M. Adams*

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GMA:bb

cc: Elaine Chang  
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