OA 11/18/2026

OFFICE OF THE GENERAL COUNSEL
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
NATHAN WONG, SBN 358472
Deputy District Counsel
21865 Copley Drive
Diamond Bar, California 91765-0940
TEL: 909.396.2754 • FAX: 909.396.2961
Email: nwong3@aqmd.gov

Attorney for Petitioner
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

SOUTH COAST AQMD
CLERK OF THE BOARDS
2026 OCT -9 P 1:03

BEFORE THE HEARING BOARD OF THE

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

In the Matter of SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, Petitioner, vs. GREEN GEN LA LLC [Facility ID No. 192014] Respondent.	Case No. 6300-1 **PETITION FOR ORDER FOR ABATEMENT** District Rule: 218 Hearing Date: November 18, 2026 Time: 9:30 AM Place: Hearing Board South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, (hereinafter referred to as "District" or "Petitioner") petitions the District Hearing Board for an Order for Abatement directed to Respondent, Green Gen LA LLC (hereinafter referred to as "Green Gen" or "Respondent"), as follows:

1. Petitioner is a body corporate and politic established and existing pursuant to Health and Safety Code § 40000, *et seq.* and § 40400, *et seq.*, and is the sole and exclusive local agency with the responsibility for comprehensive air pollution control in the South Coast Basin.

2. Respondent operates a facility ("Facility") that converts landfill gas into energy at the Toyon Canyon Landfill. The Facility is located at 5050 Mt. Hollywood Drive, Los Angeles, 90027, within South Coast AQMD's jurisdiction and is subject to South Coast AQMD rules.

3. As a part of its business, and relevant to this Petition, Respondent operates a permitted

internal combustion engine (ICE) fueled by landfill gas to drive an electric generator. This ICE was permitted in January 2021 under Permit to Operate (P/O) G64172. A true and correct copy of P/O G64172 is attached hereto as **Exhibit 1.**

Rule 218

4. **District Rule 218 – Continuous Emission Monitoring** was adopted in January 1976, and was last amended in March 2021. **District Rule 218** establishes application, approval, and operational requirements for continuous emission monitoring systems (CEMS).

5. **Rule 218(c)(1)(A)** requires that prior to installation of a new CEMS, a facility must to submit an application for District approval.

6. Condition 15 of P/O G64172 requires that a CEMS be installed, maintained, operated, and comply with all Rule 218 requirements.

7. On or around January 22, 2026, a District inspector arrived at Respondent's Facility to conduct an equipment list inspection. During the inspection, the inspector observed the ICE in operation with a documented start date of July 1, 2022.

8. The inspector observed Respondent operating a CEMS unit with the ICE, monitoring NOx emissions. However, Respondent was unable to provide any documents pertaining to a CEMS application or approval. The inspector reviewed District records and found no documents pertaining to a CEMS application or approval.

9. The District determined that Green Gen had violated Rule 218(c)(1)(A) for operating its ICE without a District approved CEMS.

10. On April 14, 2026, the District issued NOV P68897 to Respondent, alleging a violation of Rule 218(c)(1)(A). A true and correct copy of NOV P68897 is attached hereto as **Exhibit 2.**

11. On June 5, 2026, Respondent submitted a CEMS application to the District. To date, the CEMS application has not been approved.

12. Petitioner contends that Respondent is in ongoing violation of Rule 218(c)(1)(A) for continuing to operate an ICE equipped with a CEMS without a District issued CEMS certification.

//

Request for An Order for Abatement under Regulation VIII and Health and Safety Code § 42451

13. Petitioner alleges that Respondent is in violation of Rule 218. Specifically, Respondent is in violation of Rule 218(c)(1)(A), for operating an ICE equipped with a CEMS without a District issued CEMS certification.

14. The District, by this petition, seeks an Order for Abatement to require Respondent to comply with Rule 218, by: expediting the CEMS certification application by submitting an expedited request form; setting deadlines for timely information submittal to the District to aid in evaluating the CEMS application, as needed; and setting conditions for reporting emissions while the CEMS application is being processed.

15. It is not unreasonable to require Respondent to comply with District rules and regulations.

16. The issuance of an Order for Abatement upon a fully noticed hearing would not constitute a taking of property without due process of law.

17. This Order for Abatement is not intended to be, nor does it act as a variance.

18. The issuance of the requested Order for Abatement is not expected to result in the closing or elimination of an otherwise lawful business, but if it does result in such closure or elimination, it would not be without a corresponding benefit in reducing air contaminants.

19. Petitioner intends to submit to the Hearing Board, in advance of the hearing to be set in this matter, a proposed Order for Abatement and Findings and Decisions of the Board.

WHEREFORE, the District requests an Order for Abatement as follows:

1. That this Hearing Board issue an Order for Abatement requiring Respondent to cease and desist operating its Internal Combustion Engine, P/O G64172, at its Facility in a manner which violates District Rules 218, or, in the alternative, to comply with such increments of progress and conditions as the Board deems appropriate.

2. For such other and further relief that this Board deems just and proper.

//

[*signature on the next page*]

Dated: October 9, 2026

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

By: _____

Nathan Wong
Deputy District Counsel
Attorney for Petitioner

ID Permit to e or CARB ration No.	Condition No. (If Applicable)	Descript
		Failed to condu tests within intial startup
		Failed to con source test
		Failed to c test
		Failed to subm for CEMS" for prior to installa

EXHIBIT 1

EXHIBIT 2

South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

PERMIT TO CONSTRUCT/OPERATE

Permit No.
G64172
A/N 620241

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
If the billing for the annual renewal fee (Rule 301(d)) is not received by the expiration date, contact the District.

ID 192014

Legal Owner or Operator:
GREEN GEN LA LLC
1228 E GRAND AVE
EL SEGUNDO, CA 90245

Equipment Location: 5050 MT HOLLYWOOD DR, LOS ANGELES, CA 90027

Equipment Description :

Internal Combustion Engine, Jenbacher, Model No. J320 GS, Four Cycle, 20 Cylinders, Lean-Burn, Turbocharged and Aftercooled, Fired with Landfill Gas, 1,468 BHP Maximum, Driving a 1.062 MW Electrical Generator.

Conditions :

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

2. This equipment shall be properly maintained and kept in good operating condition at all times.

3. This engine shall only be fired with landfill gas.

4. This engine shall be operated in compliance with all applicable requirements of Rule 1110.2 and Rule 1150.1, whether or not explicitly stated on this permit.

5. The emissions from the engine shall not exceed the following limits (except during periods of start-up and shutdown which shall not exceed 30 minutes per incident):

Pollutant	ppm @ 15% O2, dry	Pounds per day
Oxides of Nitrogen (NOx)	11	9.95
Volatile Organic Compounds (VOC)	30	9.44
Carbon Monoxide (CO)	250	137.68
Particulate Matter (PM10)		5.13
Oxides of Sulfur (SOx)		6.16

NOx shall be averaged over one hour and CO shall be averaged over 15-minutes. VOC shall be averaged over the sampling time required by Rule 1110.2.

6. A continuous flow indicating and recording device shall be installed in the landfill gas to the engine to measure and record the volumetric flow rate of landfill gas in standard cubic feet per minute being supplied to the engine. The recording device shall be capable of recording gas flow at least every 15 minutes.

FILE COPY

7. This equipment shall not be operated unless its exhaust is vented to an air pollution control system which is in full use and which has been issued a Permit to Construct by the South Coast AQMD, except during engine cold start-ups and shut-downs, not to exceed 30 minutes.

8. A sampling port shall be installed at the inlet gas line to the engine to allow the collection of a landfill gas sample.

9. Sampling ports shall be maintained in each exhaust stack in accordance with South Coast AQMD Method 1.1. An equivalent method of emission sampling may be used upon approval by the South Coast AQMD. Adequate and safe access to the test ports shall be provided by Green Gen LA.

10. This equipment and associated air pollution control shall either reduce the non-methane organic compounds (NMOC) by at least 98 percent by weight or reduce the outlet NMOC concentration to less than 20 ppm by volume, dry basis as hexane at 3 percent oxygen. The operator shall demonstrate compliance with this limit by conducting the source test.

11. This equipment shall reduce the outlet methane concentration to less than 3,000 ppmv, dry basis, corrected to 15 percent oxygen. The operator shall demonstrate compliance with this limit by conducting the source test.

12. This engine shall be operated in compliance with all the monitoring, testing, recordkeeping and reporting requirements of Rule 1110.2 (f)(1), as outlined below:

    A. The operator shall install and maintain an operational non-resettable totalizing time meter on the engine (display reading shall be readily available) to determine the engine elapsed operating time.

    B. Conduct source testing for CO and VOC reported as carbon concentration in ppm by volume, corrected to 15% oxygen on dry basis, at least once every two years, or every 8,760 operating hours, whichever occurs first. The source test frequency may be reduced to once every three years if the engine has operated less than 2,000 hours since the last source test.

    C. The source test shall be conducted for a minimum of 30 minutes during normal operation (actual duty cycle). In addition, a source test shall be conducted for CO emissions for at least 15 minutes: (1) At the engine's actual peak load, or the maximum load that can be practically achieved during the test, and (2) At the engine's actual minimum load, excluding idle, or at the minimum that can be practically achieved during the test.

    D. The operator shall use only a source test contractor that is approved by the Executive Officer under South Coast AQMD's Laboratory Approval Program (LAP) for the necessary test methods. The operator shall comply with the procedures stated in Rule 1110.2 (f)(1)(C)(iv) through (vii), regarding the submittal of source test protocol, source test reports and utilities for sampling and testing equipment.

13. This engine shall be operated in compliance with the following additional monitoring, testing, recordkeeping and reporting requirements of Rule 1110.2 (f)(1), as outlined below:

    A. Maintain a monthly operating engine log (electronic log is acceptable) that includes:

FILE COPY

1. Total hours of operation;
2. Type of gaseous fuel;
3. Fuel consumption in cubic feet of gas; and
4. Cumulative hours of operation since the last source test required in subparagraph (f)(1)(C) of Rule 1110.2.

The log shall be made available for inspection at any time.

B. The operator shall comply with the reporting requirements of Rule 1110.2 (f)(1)(H)(i) through (iii) - amended 11/1/2019, pertaining to any equipment breakdown that results in emissions in excess of rule or permit emission limits.

14. Within 180 days of initial start-up, and at least once a year thereafter (per Rule 1150.1 requirements), unless otherwise approved by the Executive Officer, the applicant shall conduct performance tests in accordance with South Coast AQMD approved test procedures and furnish the South Coast AQMD with written results of such performance tests within 60 days after testing. Written notice of the performance tests shall be provided to the South Coast AQMD ten (10) days prior to the South Coast AQMD for approval at least 30 days prior to start of tests. The tests shall include, but may not be limited to, a test of the inlet fuel gas to the engine and the engine exhaust for:

A. Methane
B. Total non-methane organics
C. Oxides of nitrogen (exhaust only)
D. Carbon monoxide (exhaust only)
E. Total particulates (exhaust only)
F. Hydrogen sulfide (inlet only)
G. Sulfur compounds, calculated as H2S (speciated, inlet only)
H. Carbon dioxide
I. Aldehydes (exhaust only)
J. Rule 1150.1 Table 1 toxic air contaminants (TAC) including, but not limited to, benzene, chlorobenzene, 1,2-dichloroethane, 1,1-dichloroethene, dichloromethane, tetrachloroethylene, tetrachloromethane, vinyl chloride, acetaldehyde, formaldehyde, 1,4-dioxane and xylene isomers.
K. Oxygen (inlet and outlet of SCR; must be measured at the same time as carbon monoxide test)
L. Nitrogen
M. Moisture content
N. Temperature
O. Flow rate
P. NMOC Destruction Efficiency
Q. BTU content (inlet only)

15. A Continuous Emissions Monitoring System (CEMS) capable of measuring and monitoring NOx emissions shall be installed, maintained and operated. This CEMS shall:

A. Comply with all applicable specifications, certification, operation, recordkeeping, quality assurance, reporting, performance and testing requirements of South Coast AQMD Rules 218, and 218.1.

FILE COPY

B. Continuously measure and record NOx, and O2 exhaust gas concentrations, uncorrected and corrected to 15 percent oxygen on a dry basis.

C. Have data gathering and retrieval capability that has been approved by the South Coast AQMD. Data shall be recorded on a strip chat or stored electronically. If data is electronically stored, the operator shall provide for data storage redundancy of at least one calendar month and shall demonstrate to the Executive Office that the stored electronic data is equivalent to the strip chart data.

D. Be tested for relative accuracy at least once every two years, or every 8,760 operation hours, whichever occurs first, in accordance with Rule 1110.2 Amended November 1, 2019. The minimum sampling time for each relative accuracy test shall be 15 minutes.

E. Prior to installation or modification, this CEMS Monitoring system shall be certified and approved in writing by the Executive Officer.

16. The operator shall maintain and implement a Rule 1110.2 Inspection and Monitoring (I&M) plan, based on equipment as described in this permit, in accordance with the applicable provisions of Rule 1110.2 (f)(1)(D).

17. The operator shall conduct emission checks using a portable NOx, CO, and oxygen analyzer. Initially, the emission checks are required every week or every 150 hours of operation, whichever occurs later. After compliance of three consecutive emission checks, the engine shall be checked monthly or 750 hours, whichever occurs later.

18. Operation of this equipment shall not result in the release of raw landfill gas into the atmosphere. Any breakdown or malfunction which results in emissions of raw landfill gas shall be reported to the South Coast AQMD Executive Officer within one hour of breakdown or within one hour of the time said person knew or reasonably should have known of its occurrence. Immediate remedial measures shall be undertaken to correct the problem and prevent further emissions into the atmosphere in accordance with Rule 430.

19. This engine shall not be operated in such a manner as to interfere with the ability of the landfill operator/owner to comply with South Coast AQMD Rule 1150.1 or any other South Coast AQMD, state or federal rule limiting landfill gas migration or surface emissions.

20. All records required by this permit shall be retained at the facility for a minimum of five years and shall be made available to any South Coast AQMD representative upon request.

21. Pertaining to the operation of this equipment, the operator shall comply with all applicable requirements of the following Code of Federal Regulations: Title 40 Part 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, Title 40 Part 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills; Title 40 Part 63 Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills; and Title 40 Part 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

FILE COPY

22. This permit shall expire if construction of this equipment is not completed within one year from the date of issuance unless an extension is granted by the Executive Officer.

NOTICE

In accordance with Rule 206, this Permit to Operate or copy shall be posted on or within 8 meters of the equipment.

This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the applicable Rules and Regulations of the South Coast Air Quality Management District (SCAQMD). This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

Executive Officer

Amir Dejbakhsh

BY AMIR DEJBAKHSH/JJ01
1/28/2021

FILE COPY