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12 Attorneys for Petitioner CITY OF RIVERSIDE  
13 REGIONAL WATER QUALITY CONTROL  
14 PLANT

15 **BEFORE THE HEARING BOARD OF THE**  
16 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

17 In the Matter of )  
18 ) Case No. 5674-10  
19 CITY OF RIVERSIDE REGIONAL WATER )  
20 QUALITY CONTROL PLANT, ) **DECLARATION OF ROBERT**  
21 [Facility ID No. 9961] ) **ELAND IN SUPPORT OF SHORT**  
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172 Petitioner, City of Riverside Regional Water Quality Control Plant, hereby submits this  
173 Declaration of Robert Eland, Technical and Compliance Manager, to the Hearing Board:

174 1. I am the Technical and Compliance Manager for the Regional Water Quality  
175 Control Plant (“RWQCP”) of the City of Riverside. If called as a witness, I could testify to the  
176 following based on personal knowledge.

177 2. I am familiar with and have reviewed the petition filed in South Coast Air Quality  
178 Management District (“AQMD”) Case No. 5674-10, and I am familiar with the leaks from  
179 Digester 3 causing an inability to comply with prohibition of operation of equipment that results  
180

1 in the release of raw digester gas into the atmosphere contained in conditions and rules as specified  
2 in the AQMD permit for the RWQCP, Permit No. G82104, A/N 656209, including Rule 203(b)  
3 and 430.

4 3. RWQCP is a Publicly Owned Treatment Works with a rated capacity of 46 MGD.  
5 RWQCP is responsible for the collection and treatment of wastewater generated within the City of  
6 Riverside and the communities of Edgemont, Jurupa, and Rubidoux, serving a population of over  
7 300,000 residents. The treatment processes consist of primary, secondary, and tertiary treatment,  
8 including Activated and MBR treatment trains, as well as disinfection/dichlorination.  
9 Additionally, RWQCP handles and treats the sludge produced throughout the wastewater  
10 treatment process. All treated sludge is hauled off site by a third-party contractor.

11 4. On April 16, 2026, at approximately 0800 hours, RWQCP Maintenance Staff were  
12 completing preventive maintenance on Digester 3's mixer when a gas leak was heard. At  
13 approximately 1335 hours after thorough investigation of the area a digester gas leak was  
14 confirmed coming from Digester 3's Sight Glass. RWQCP Regulatory Staff notified AQMD of  
15 the leak at 1444 hours – Breakdown Notification 884797, Operator No. 4. At approximately 1700  
16 hours, RWQCP Maintenance Staff completed their first attempt at stopping the leak utilizing string  
17 packing and silicone self-sealing tape. Three (3) attempts have been completed by RWQCP staff  
18 to stop the leak, and while the leaks have temporarily stopped, the leak has continued intermittently  
19 since it was first reported to AQMD on April 16, 2026. As requested by RWQCP AQMD  
20 Inspector, Charles Herrera, a second Breakdown Notification – Notification No. 885796, Operator  
21 No. 5 – was reported to AQMD on April 23, 2026, at 1325 hours, after the RWQCP's second  
22 attempt to stop the leak did not succeed. RWQCP Operations Staff have continued to monitor the  
23 site for H2S every four (4) hours and will continue to monitor until normal operations can be  
24 achieved. All monitoring events are recorded.

25 5. On April 17, 2026, a second leak coming from Digester 3's Flame Arrestor was  
26 identified by RWQCP Operations Staff, who reported a second Breakdown Notification to AQMD  
27 – **Notification No. 884907, Operator No. 5** at approximately at 0903 hours. At approximately  
28 1300 hours, RWQCP completed its first attempt at stopping the leak by installing a gasket on the

1 flame arrestor. RWQCP has made multiple attempts at stopping the leak since it was first reported  
2 on April 17, 2026, and while temporarily stopped, the leak has continued intermittently. RWQCP  
3 Operations Staff have continued to monitor the site for H2S every four (4) hours and will continue  
4 to monitor until normal operations can be achieved. All monitoring events are recorded.

5 6. To achieve full compliance, Digester 3 must first be depressurized, which requires  
6 it to be taken offline and emptied. RWQCP cannot do this until Digester 4 is available to replace  
7 it and accept the contents. Digester 4 is currently undergoing maintenance, RWQCP staff  
8 anticipates several weeks to finalize installation of linear motion mixer/flow meters and to exercise  
9 the existing equipment. Then a week to purge the digester with nitrogen. According to RWQCP  
10 staff and contractors, the best estimate for Digester 4 availability is mid to late May.

11 7. Digester 3 is included under RWQCP AQMD Permit No. G82104 as part of the  
12 facility's Solids Handling System. Digester 3 is approximately 90' in diameter and 38' in height  
13 with pump mixers, pressure relief and vacuum breaker valves, and a carbon adsorber with an  
14 approximate capacity of 400 lb. The Digester is an essential part of the RWQCP's wastewater  
15 treatment process, including continued capability to perform sludge anaerobic digestion, as well  
16 as methane production. RWQCP is a 24 hour – 365 day a year operated facility, requiring all  
17 systems to perform as intended to maintain quality public service and operation of treatment  
18 processes.

19 8. Condition 17 of Permit No. G82104, A/N 656209 provides that "operation of this  
20 equipment shall not result in the release of raw digester gas into the atmosphere. Any breakdown  
21 or malfunction of this equipment resulting in the emission of raw digester gas shall be reported to  
22 the South Coast AQMD within one hour of such breakdown or within one hour of the time the  
23 operator knew or reasonably should have known of its occurrence and immediate remedial  
24 measures shall be undertaken to correct the problem and prevent further emissions into the  
25 atmosphere." Therefore, Digester 3 cannot comply with this condition until mid-to-late May.


26 9. RWQCP Engineering Staff estimate the leak from the sight glass at 0.9 scfm and  
27 the leak from the flame arrestor assembly at 0.0005 scfm. The initial leaks have been repaired but  
28

1 leaking is still intermittent and monitored continuously. 0.9005 scfm, 1,296.72 scfd at 76.7 ppmv  
2 H2S. ppmv / 1,000,000 x scfd / 379.6 x 34. Engineering Staff estimate the leak is 0.008908 lbs/day.

3 10. RWQCP plans to continue monitoring the leaks every 4 hours, 24 hours a day.  
4 Calculations to quantify emission levels will use daily H2S concentrations and leak volumes.

5 11. Operation under the Order is not expected to result in a violation of Health and  
6 Safety Code Section 41700 (nuisance).

7  
8 **I declare under penalty of perjury under the laws of the State of California that the**  
9 **foregoing is true and correct to the best of my knowledge, and as to matter stated on**  
10 **information and belief, I believe them to be true. Executed this 5<sup>th</sup> day of May, 2026, at**  
11 **Riverside, California.**

12  
13 By:   
14 \_\_\_\_\_  
15 ROBERT ELAND  
16 Technical and Compliance Manager,  
17 City of Riverside Regional Water  
18 Quality Control Plant  
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