



South Coast Air Quality Management District

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Via Email and Certified Mail with return receipt

February 18, 2020

Stephen Zurn
General Manager
Glendale City, Glendale Water & Power
141 N Glendale Ave.
Glendale, CA 91206-4426

Subject: Conditional Approval of Rule 1402 Risk Reduction Plan for **Glendale City, Glendale Water & Power (Grayson Power Plant)** (South Coast AQMD Facility ID No.: **800327**)

Dear Mr. Zurn:

This letter provides conditional approval of the Risk Reduction Plan (RRP) for Glendale City, Glendale Water & Power (GWP), located at 800 Air Way, Glendale (Facility ID No. 800327).

Background

In accordance with AB 2588 and South Coast Air Quality Management District (South Coast AQMD) Rule 1402, South Coast AQMD staff notified GWP on March 22, 2018 that it must submit a Health Risk Assessment (HRA) based on its 2015 Air Toxics Inventory Report (ATIR). The HRA prepared for this request was submitted on July 18, 2018. South Coast AQMD staff and the Office of Environmental Health Hazard Assessment reviewed the HRA and approval was granted on January 22, 2019.

The HRA demonstrated that the cancer health risk levels were mainly due to dioxins and furans emissions from landfill gas combustion from Boilers 3, 4, and 5. The levels exceeded both the Notification Risk Level and the Action Risk Level of Rule 1402; therefore an RRP was required. GWP submitted the RRP to South Coast AQMD on October 9, 2019.

Risk Reduction Plan and Next Steps

The RRP proposes operational changes to permanently discontinue combustion of landfill gas in Boilers 3, 4, and 5. The RRP demonstrates that the risk reduction from this risk reduction measure (RRM) alone will reduce the facility's risk below the Action Risk Level and Notification Risk Level of Rule 1402.

A separate proposed RRM is to reduce facility utilization of combustion systems to meet South Coast AQMD Rule 1135 (g)(4) low-use restrictions by January 1, 2024. This RRM is not included as part of the approved RRP since risk reduction for this RRM was not quantified in the RRP and implementation of this component will exceed the 2.5 years as required under South Coast AQMD Rule 1402 (i)(1).

Therefore, GWP's RRP is conditionally approved contingent upon GWP submitting permit modification applications for Boilers 3, 4, and 5 to remove landfill gas as a secondary fuel, along with a Title V revision application. Pursuant to Rule 1402 (f)(2)(F), these applications shall be submitted within 180 days, or August 18, 2020.

Please be advised, pursuant to South Coast AQMD Rule 1402 (k)(1), if information becomes known to the Executive Officer after the last submitted risk reduction plan that would substantially impact risks to exposed persons, implementation, or effectiveness of the plan, the Executive Officer may require the plan to be updated and resubmitted. Such examples include discovery of fugitive emissions emitted outside of traditional ventilation stacks or new equipment or processes.

In addition, pursuant to Rule 1402 (j), GWP is required to submit annual progress reports to demonstrate the progress achieved in implementing the RRM's. The first annual progress report is due 12 months from the date of this approval letter, on February 18, 2021. A final implementation report must be submitted once implementation is fully achieved.

If you have any questions, please feel free to contact me at (909) 396-3106 or Victoria Moaveni, Program Supervisor at (909) 396-2455.

Sincerely,



Tracy A. Goss, P.E.
Planning & Rules Manager
Planning, Rule Development & Area Sources

TG:VM:FC:EL