



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Biogas Renewable Generation Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish the existing landfill gas collection system and construct and operate an approximately 12-megawatt power generation facility that would utilize landfill gas as a fuel to generate renewable energy (Proposed Project).

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality analysis, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be less than significant and that the Proposed Project's operational emissions of NOx and VOCs would be offset through the allocations from the SCAQMD Priority Reserve Credits¹. The Lead Agency stated that "since construction and operation of a landfill gas processing facility is considered to be an essential public service, Priority Reserve credits are expected to be granted for this Project pursuant to SCAQMD Rule 1309.1 for pollutants that exceed small source thresholds"².

SCAQMD Staff's Comments

SCAQMD staff has comments about the air quality cumulative impacts analysis, energy input rating, compliance with SCAQMD Rules, and SCAQMD permits. Comments are provided as follows.

Air Quality Cumulative Impacts Analysis

The Lead Agency considered the potential cumulative air impacts from the Grayson Power Plant Repowering project³. However, the Lead Agency did not consider how the Proposed Project's air quality impacts would be cumulatively affected when it is combined with the air quality impacts from the proposed Scholl Canyon Landfill Expansion project (SCH No. 2007121023). In the cumulative impacts analysis for noise, the Lead Agency found that the proposed Scholl Canyon Landfill Expansion project could cumulatively affect a nearby sensitive receptor for noise exposures⁴. Similarly, the Lead Agency found that implementation of the Proposed Project may overlap with implementation of the proposed School Canyon Landfill Expansion project causing an incremental cumulative increase in vehicle traffic at the intersections of Figueroa Street and Highway 134 ramps⁵. Therefore, to be consistent with cumulative impact analyses for noise and transportation and traffic, SCAQMD staff recommends that the

¹ MND. Page 3.3.17

² MND. Page 3.3.13.

³ MND. Page 3.19.3.

⁴ MND. Page 3.19.5

⁵ MND. Page 3.19.6.

Lead Agency disclose the potential incremental impacts on air quality from the proposed School Canyon Landfill Expansion project in the Final MND.

Energy Input Rating

The criteria and toxic emissions from the Internal Combustion Engines/Cogeneration system (ICE/Cogens) is based on an energy input rating of 26.34 mmbtu/hr⁶ even though the manufacturer's specified maximum energy input is rated at 23.9 mmbtu/hr⁷. Additionally, the total greenhouse gas emissions of 48,427 MT/year⁸ of CO₂e was based on the input rating of 95.14 mmbtu/hr, which was about four times the manufacturer's rating of 23.9 mmbtu/hr per engine. SCAQMD staff recommends that the Lead Agency revise the Air Quality analysis by using one energy input rating consistent throughout the Final MND and associated appendices.

Compliance with SCAQMD Rules

Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing

Since the Proposed Project includes the abandonment of existing landfill gas pipeline from Scholl Canyon Landfill to Grayson Power Plant, SCAQMD staff recommends including a discussion to demonstrate compliance with Rule 1149 in the Final MND.

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

The scope of work and asbestos survey at this time indicates that the existing temporary/portable offices and landfill condensate/groundwater collection systems will not be disturbed, therefore are not included in the pre-demolition asbestos survey. If plans change and any of these facilities are renovated or demolished, the asbestos survey⁹ will need to be amended to include any additional structures or facility components. A 10-working day notification before any demolition or renovation activities other than emergency demolition or renovation is required pursuant to Rule 1403.

Rule 1150.1 – Control of Gaseous Emissions From Municipal Solid Waste Landfills

Since the Proposed Project involves demolition and construction of a landfill gas combustion system, SCAQMD staff recommends that the Lead Agency ensure that the Proposed Project is consistent with the Rule 1150.1 Alternative Compliance Plan.

California Code of Regulation Title 13, Division 3, Chapter 9, Article 5 – Portable Engine and Equipment Registration

Portable equipment brought onsite must be registered with California Air Resources Board under the Portable Equipment Registration Program (PERP) and may not reside on the facility for greater than one year without a Permit to Operate from SCAQMD. Notification to SCAQMD of PERP equipment is required.

SCAQMD Permits

Based on SCAQMD staff's review of the MND, it is foreseeable that Lead Agency will rely on the adopted MND to demonstrate CEQA compliance for the Proposed Project's permits from SCAQMD. Therefore, it is critical that the information in the permit applications filed with SCAQMD for the Internal Combustion Engines/Cogeneration system (ICE/Cogens) and associated Selective Catalytic Reduction equipment are consistent with the assumptions used in the Air Quality analysis in the MND. Moreover, since SCAQMD permits are required, SCAQMD should be identified as a Responsible Agency for the

⁶ Appendix A.2.3. Page 364.

⁷ Page 377.

⁸ Table 3.7-3. Page 156.

⁹ Appendix G – Pre-Demolition Asbestos and Lead-Based Paint Survey

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Proposed Project in the MND. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. For any questions on permits, please contact Mr. Ken Matsuda, Senior Air Quality Engineer, at KMatsuda@aqmd.gov or at (909) 396-2656.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

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