

CITY OF  RANCHO PALOS VERDES

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16 August 2007

Glenn Acosta, Senior Engineer
Planning Section, Facilities Planning Department
Los Angeles County Sanitation Districts
1955 Workman Mill Rd.
Whittier, CA 90601

**SUBJECT: Request for a Focused Environmental Impact Report for the
Proposed Palos Verdes Gas-to-Energy Facility Phase II**

Dear Mr. Acosta:

The City of Rancho Palos Verdes is in receipt of the Districts' Notice of Intent to Adopt a Negative Declaration for the above-mentioned project. Our Staff is currently reviewing the Initial Study and Negative Declaration for this project, and we will have substantive technical comments on it in the near future. We also appreciate that the Districts undertook a cursory evaluation of air quality impacts as a part of the preparation of the Negative Declaration. Nevertheless, we were surprised at the Districts' determination that the project would have no adverse environmental impacts requiring mitigation.


As the Districts are well aware, the residents of the Palos Verdes Peninsula have been keenly aware of and concerned about the human health impacts of the former Palos Verdes Landfill in the past few years. At many meetings with the Community Advisory Board (CAB), residents have asked the Districts to prepare an environmental impact report (EIR) focusing upon the air quality impacts of changes to the existing gas-to-energy facility. The City of Rolling Hills Estates, within whose corporate boundaries the former landfill is located, has retained a consultant to review the adequacy of the Districts' proposed Negative Declaration. We trust that the Districts will carefully consider the forthcoming comments from Rolling Hills Estates' consultant, as well as comments from citizens, stakeholders and other interested parties.

Glenn Acosta
16 August 2007
Page 2

Based upon past public expressions of concern about the health effects of the former landfill, the City of Rancho Palos Verdes respectfully requests that the Districts prepare an EIR focusing upon the air quality impacts of the proposed Palos Verdes Gas-to-Energy Facility Phase II. We also draw the Districts' attention to Section 15081.5 of the State CEQA Guidelines, which requires the preparation of an EIR for projects involving the burning of refuse-derived fuel under certain specified conditions.

Thank you for your consideration of the concerns of the City of Rancho Palos Verdes and its residents in this matter. If you have any questions or need additional information, please feel free to contact Associate Planner Kit Fox at (310) 544-5228 or via e-mail at kittf@rpv.com.

Sincerely yours,



Thomas D. Long
Mayor

cc: Rancho Palos Verdes City Council
Carolyn Lehr, City Manager
Joel Rojas, Director of Planning, Building and Code Enforcement
Kit Fox, Associate Planner



Table 1
Permitted Air Emissions Comparison of Proposed and Other Operating Scenarios (lbs/day)

OPERATING SCENARIO NO. 1	OPERATING SCENARIO NO. 2	OPERATING SCENARIO NO. 3	OPERATING SCENARIO NO. 4
UTILIZING NEW EQUIPMENT		UTILIZING EXISTING EQUIPMENT	
PROPOSED Fuel Cell, Microturbines, and Low Emissions Flare	All Landfill Gas Directed to Low Emissions Flare	All Landfill Gas Directed to Existing Flare Station	Existing Gas-to Energy Facility (Boilers/ Backup Flares)
Non-Attainment Pollutants			
NOx = 64	45	115	109
ROG = 116	116	116	116
PM10 = 50	41	*	78
Attainment Pollutants			
SOx = 79	79	79	79
CO = 114 (57 ¹)	109 (51 ¹)	*	46
Notes: • NOx is oxides of nitrogen, ROG is reactive organic gases, PM10 is particulate matter less than 10 microns in size, SOx is sulfur oxides, and CO is carbon monoxide. • Criteria pollutants such as NOx contribute to the Severe Non-attainment classification of the South Coast Air Basin and are, therefore, part of the air emissions analysis. NOx in particular contributes to smog formation. • * Indicates that comparable permitted values are not available. (1) The new equipment has permitted CO emissions higher than the existing facility. However, a SCAQMD New Source Review Rule 1303 screening analysis finds that the CO emissions from the new source are less than the SCAQMD allowable emissions and will not result in an exceedance of state or national ambient air quality standards. Actual CO emissions as indicated by superscript 1 are expected to be comparable to the existing equipment.			

CO will almost triple with proposed project!

Table 2 below shows the HRA results for the proposed equipment under the two operating scenarios Nos. 1 and 2, indicating that the health risk for these scenarios are well below the 10 per million SCAQMD limit for residential and commercial receptors. For all the surrounding schools, the proposed equipment has a health risk well below the required 1 in a million SCAQMD limit.