

February 27, 2024

Via Email Read Receipt Requested

Keith Quinlan City of Lompoc 1300 W. Laurel Avenue Lompoc, CA 93436

Re: Conditional Approval of 2018 ATEIR for Lompoc Sanitary Landfill Air Toxics "Hot Spots" Information and Assessment Act (AB 2588)

Dear Keith Quinlan:

The Santa Barbara County Air Pollution Control District (District) has reviewed your Air Toxics Emission Inventory Report (ATEIR) for inventory year 2018 dated December 2023. Based on our review of the report, the District conditionally approves the ATEIR. The ATEIR conditional approval items are detailed in Attachment A of this letter.

Please submit a final ATEIR and health risk assessment (HRA) by September 2, 2024. Include a response letter with a response to each incompleteness item in Attachment A. Electronic copies of the HRA, final ATEIR and response letter should be sent via email to CobbsR@sbcapcd.org.

If you have any questions or require additional information, please contact me at CobbsR@sbcapcd.org or (805) 979-8320.

Sincerely,

Robin Cobbs

Engineering Division

Lompoc Sanitary Landfill 08744 Project File cc:

Lompoc Sanitary Landfill 08744 Toxics File

Toxics Group Engr Chron File

Rebecca Frohning, WSP

Attachment A: Conditional Approval Items for Lompoc Sanitary Landfill 2018 ATEIR

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ATTACHMENT A

CONDITIONAL APPROVAL ITEMS FOR LOMPOC SANITARY LANDFILL 2018 ATEIR

- 1. <u>Stack Temperature for Waste Grinder Engine</u>. Since documentation cannot be found for the revised temperature for the waste grinder diesel engine, use Appendix D Default DICE Stack Parameters of <u>Form-15i</u> to determine the appropriate temperature (i.e., 799 °F for engine size 605 bhp 750 bhp).
- 2. <u>Summary of Toxic Air Contaminant (TAC) Emissions</u>. Update *Table 2: 2018 Toxic Air Contaminant Emissions* of the ATEIR to reflect the changes noted below.

The comments below refer to the ATEIR spreadsheet, Lompoc TAC Emissions Dec2023.xlsx.

- 3. Flare Condensate. No maximum hourly emission calculation was included for the flare condensate in the ATEIP and ATEIR. It appears this was an oversight in the ATEIP, which carried over to the ATEIR. Although it is likely that the landfill gas (LFG) maximum hourly flare emissions will be much higher for most pollutants than flaring the condensate, the maximum hourly flared condensate emissions must still be included in the ATEIR. The maximum hourly emissions must be based on either the maximum hourly capacity of flared condensate or the maximum daily amount of condensate flared based on the 2018 records, as hourly records are not kept. Revise the ATEIR accordingly.
- 4. <u>Paved Roads</u>. The maximum hourly vehicle mile traveled (VMT) is incorrect. The calculation should be 25 vehicles/hour multiplied by 1.4 miles roundtrip for a total of 35 VMT in one hour. Revise the *Paved Roads* tab accordingly.
- 5. <u>Wind Erosion</u>. The four pollutants listed below were missing from the fugitive dust profile for the TAC emission calculations on the *Wind Erosion* tab. Revise the *Wind Erosion* tab to include emissions for these pollutants and update the *Emissions Summary* tab as necessary.
 - a. Aluminum
 - b. Barium
 - c. Cobalt
 - d. Crystalline silica
- 6. <u>HARP 2 Emissions</u>. The HARP Stack ID and HARP Process ID on the *HARP2 Emissions* tab are shown as zero for all pollutants and sources. Update this tab with the values used in the HRA.