

## Telephone Record

DATE: August 8, 2008  
TO: KCL LUP Amendment Project File  
FROM: Joel Sabenorio, Consultant to County DCD, Conservation Programs  
RE: Telephone Conversation with Carol Allen, BAAQMD on July 16, 2008.

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Carol Allen administers the various air permits for Keller Canyon Landfill. We worked closely together on the environmental reviews for the LFG power plant at Keller. We also coordinate as needed on oversight of Keller operations. I contacted her to solicit any comments on the KCL LUP Amendment application we sent her in June 2008.

### Main Discussion Points

- Allen is not opposed to preparation of a Mitigated Negative Declaration (versus an EIR)/ She wants to see “full analysis” of potential impacts related to emissions from operations and transportation
- The full range of potential mitigation measures need to be considered and/or prescribed
- Analysis should address potential for on-site incremental increase in precursor organic compounds and toxic air contaminants (TACs)
- Health Risk Assessment should be required (see last bullet below). Based on recent testing, KCL is currently close to threshold of 10 in a million for benzene (pushing limit); should discuss potential effects to sensitive receptors within proximity of landfill or planned to develop (*Joel: e.g. BART Station, redevelopment of Orbisonia Heights*)
- Benzene, formaldehyde, and chlorinated hydrocarbons are common constituents in landfill gas; Allen believes possible source at Keller could be from burying of petroleum-contaminated soil or its use for cover (*Joel: follow-up*)
- Above constituents, plus non-carcinogens such as hydrogen sulfide (low at Keller) are largely destroyed in flare combustion and similarly in LFG power plant. Air District assumes 75% efficiency plus final abatement. Landfill industry probably believes this efficiency is too low compared to actual. Analysis should discuss projected efficiencies and identify mitigation measures
- Allen reminded me that the analysis must address impacts from the entire facility (combined project) not just the incremental increase associated with tonnage. Check District Reg 2 (Permits) and Rule 2 New Source Review; need to evaluate entire landfill plus future modifications.
- See BAAQMD Health Risk Screening Analysis Guidelines plus 2-5-302 Project Risk Requirement. Authority to Construct or Permit to Operate for any new or modified source of TACs can be denied if project risk exceeds any of the following project risk limits:
  - A cancer risk of 10.0 in one million (10 E-6).
  - A chronic hazard index of 1.0.
  - An acute hazard index of 1.0

See Table 2-5-1 in Reg 2 Rule 5 for trigger levels of various TACs.