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August 25, 2022

Ms. Barbara Romero, Director and General Manager
Los Angeles Sanitation and Environment
1149 S. Broadway Street, Suite 900
Los Angeles, CA 90015-2213
Barbara.romero@lacity.org

**RE: HYPERION WATER RECLAMATION PLANT - ODOR COMPLAINTS
FROM RESIDENTS**

Dear Ms. Romero:

The Los Angeles County Department of Public Health (Public Health) is in receipt of the Los Angeles Sanitation and Environment's (LASAN) May 31, 2022, letter that describes the efforts that the Hyperion Water Reclamation Plant (HWRP) has taken and intends to take to mitigate the negative impacts to residents caused by foul odors emanating from HWRP. Public Health understands that the efforts to implement measures to mitigate the release of emissions from HWRP are difficult and time-consuming. HWRP described the technological advancements including biotrickling filters and other measures at the Headworks Facility and intermediate pumping station to be completed in late 2022 and improvements to the primary treatment sanitation tanks to be completed in December 2023.

Unfortunately, Public Health continues to receive health complaints from the neighboring community, and our colleagues at the South Coast Air Quality Management District (SCAQMD) continue to receive odor complaints regarding HWRP. Notably, SCAQMD has received over 500 odor complaints since January 2022 and issued 7 Notices of Violation to HWRP since June 2022. Moreover, on August 3, 2022, SCAQMD filed a Petition for an Order of Abatement to require HWRP to take immediate actions to abate the public nuisance caused by the ongoing odors.

Public Health supports SCAQMD's request for an order from the SCAQMD Hearing Board that would require HWRP to: (1) expedite the installation of permanent fence-line monitoring stations to collect real-time data and (2) institute a 24/7 odor control and response program to address community concerns.

Additionally, LASAN needs to quickly install and maintain continuous hydrogen sulfide monitoring along the border with existing residential areas between Imperial Blvd. and W. Grand Avenue. The projected installation of the third hydrogen sulfide monitor in summer 2023 is an unacceptable timeline. LASAN needs to determine an alternate temporary location and install this monitor as soon as possible, which will allow LASAN to better quantify and document the hydrogen sulfide odor impacts to the surrounding community.

In addition, Public Health has repeatedly outlined the need for a comprehensive monitoring protocol for typical sewage-related gases that may be emitted from HWRP, including ammonia, methane, sulfur, dioxide, nitrous oxides, volatile organic compounds, and polycyclic aromatic hydrocarbons at Hyperion. These gases possess a wide range of human toxicity profiles and are as clinically significant as hydrogen sulfide; therefore, the health of the community is predicated on LASAN's efforts to document and minimize all community emissions, and not simply hydrogen sulfide.

Both LASAN and Public Health agree on the importance of monitoring these additional emissions in a comprehensive fence line monitoring plan. Public Health is dismayed by LASAN's position to base community-protective monitoring on minimal "applicable regulatory requirements" and not on proactive efforts to optimize your ability to protect neighboring communities. If you are confident that your technological advancements are the more effective ways to address concerns about HWRP emissions, then HWRP should document that anticipated effectiveness with comprehensive monitoring. Public Health recommends that LASAN seek a qualified consultant to develop and implement a plan for comprehensive air monitoring, and to keep Public Health apprised of those plans.

Public Health has reviewed the LASAN website regarding current hydrogen sulfide monitoring and has the following recommendations for improvement:

- 1) LASAN has installed only one continuous hydrogen sulfide monitor, on the southern fence line. Findings from this monitor posted on <http://www.lacitysan.org/hyperionair> are misleading.
 - a. This map illustrates the location of the South Monitoring Station, accompanied by a quantitative reading in parts per billion (ppb). However, as the user scrolls through the range of available dates, the map merely reveals a repeated calculated daily average "1 ppb" without proper characterization. Displaying daily averages misleads the viewer, because ranges, and especially maximums, are not displayed; and further gives a false impression that exposure levels are consistently low. In the setting of hydrogen sulfide exposure and human health, daily average exposure levels in this range are largely irrelevant. Residents and DPH need to know the range of quantitative levels detected by your monitors, to understand potential correlations between your readings and symptoms reported by the community. Continuous monitoring, by implication, give all of us the ability to understand those ranges and maximum values as a function of time. **Public Health recommends that this daily average label be replaced by a daily range.**

- b. The info-graph contains several critical insufficiencies. The red-and-green coloring above and below the “30 ppb” line gives a false impression (i.e., “green equals good” and “red equals bad”). This coloration misleads the viewer into interpreting all current results as “good”, as they all seem to fall into the “green” range. However, we know that exposure to hydrogen sulfide at levels below 30 ppb routinely cause detectable odors and symptoms. Hydrogen sulfide at a level of 30 ppb does have some industrial significance; however, this number is relatively arbitrary and has little clinical relevance in the context of residential exposure. Indeed, your subheading on the top of this webpage clearly states that hydrogen sulfide “...*can be smelled at very low concentrations in air, at least 1,000 times below the level that would cause eye and lung irritation.*” As you are aware from the health complaints from your community and from numerous complaints from the Dominguez channel incident, odors alone from hydrogen sulfide cause well-documented physiological responses, including nausea, vomiting, headache, dizziness, and other symptoms. **Therefore, Public Health recommends that you remove the red-green coloration in the info-graph and remove the 30-ppb reference line contained therein.**

- c. More broadly, the info-graph contains a great deal of unnecessary empty space, between your graphical curve and the top border of your graph. This formatting is well-known to “squash” the appearance of graphical curves and leads viewers to interpret the y-values of your graphical curve as appearing to cluster towards “zero”, thus concealing elevations that may be of significance. **Public Health recommends that you alter the scale and size of the info-graph appropriately to eliminate empty space and to enable viewers to easily view the Y-values and their fluctuations throughout the day.**

Public Health is requesting a response by September 7, 2022, to address the concerns regarding the public nuisance conditions and issues outlined above.

Please reach out to me directly at (626) 430-5100, if you have any questions or concerns. Thank you for your prompt attention to this matter.

Sincerely,



Liza Frias, REHS
Director, Environmental Health

- c: Nicholas A. Sanchez, Assistant Chief Deputy Counsel
South Coast Air Quality Management District
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