

Via Email and U.S. Mail

November 5, 2021

Dr. Jo Kay Ghosh
Director of Community Air Programs/Health Effects Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Re: Hyperion Sewage Spill

Dear Dr. Ghosh,

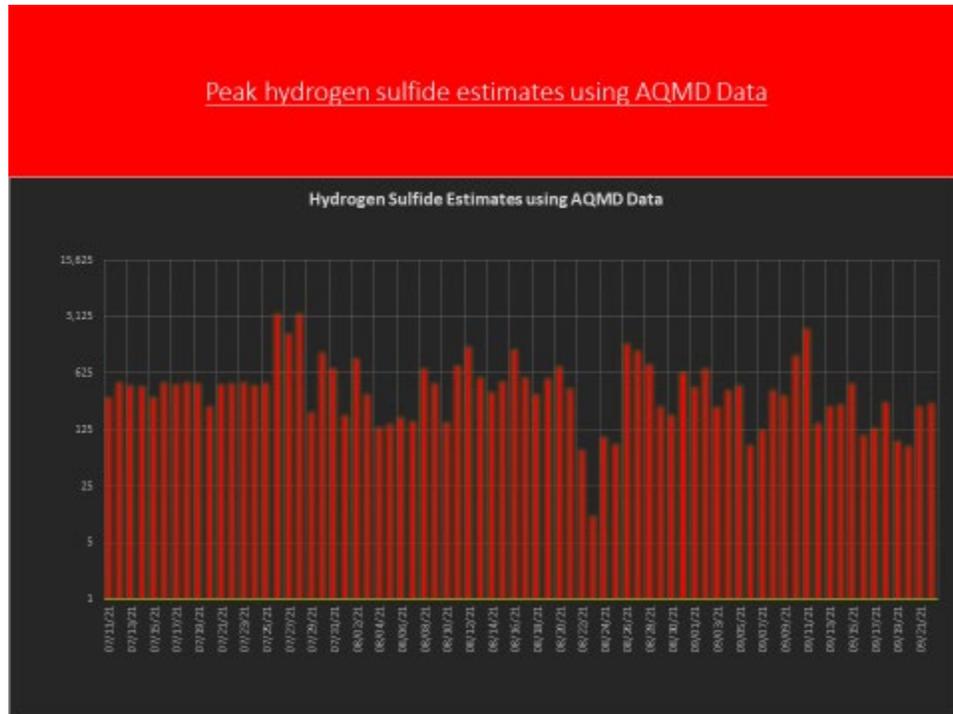
We write on behalf of our clients in El Segundo impacted by the hydrogen sulfide gas coming from the sewage spill and sewage build up at Hyperion Treatment Plant. LA Sanitation did not test for hydrogen sulfide during most of July. LA Sanitation also did not test during the night when the inversion layer results in higher concentrations of pollutants like hydrogen sulfide.

The Rule 1180 test by the South Coast Air Quality Management District (AQMD) is more than a mile from the point source of the pollution and thus does not capture what most residents are experiencing. That data, however, is valuable for calculating the dilution rates of hydrogen sulfide. For example, LA Sanitation calculated emissions of hydrogen sulfide levels of 321.55 at 1 p.m. on August 3, 2021. On that day, AQMD's testing monitors at St. Anthony's showed hydrogen sulfide levels of .33 ppb at 1:05 p.m. Thus, it appears the hydrogen sulfide levels dropped 974 times the level shown at the fence line before it reached AQMD's test monitor.



Looking at LA Sanitation and AQMD test data through the end of August, the dilution rates vary. The average dilution rate appears to be 89.55.

Using the average dilution rate, and the available AQMD test data from St. Anthony's, it would appear that the fence line levels of hydrogen sulfide were consistently high in the first two months of the sewage spill. As shown below, most days appear to be well above the 30 ppb acute reference exposure level for one hour.¹ With exposures that lasted for over two months, this is alarming.



LA Sanitation in their 30 day report suggested that the hydrogen sulfide levels dropped substantially after they began processing sludge on August 1. LA Sanitation wrote: “instantaneous hydrogen sulfide concentrations have decreased from the highest measured at any location of 657 parts per billion (ppb) on July 27 to 10.25 ppb as the highest concentration at any location on August 12, 2021 with most locations at either 0 ppb or in the single digits.”

LA Sanitation’s representations understate the exposures because of its failure to test when most people are home – at night. The estimated hydrogen sulfide exposures shown above mostly capture exposures between late evening and early morning, and these are important components

¹ Between July 11 and September 22, 2021, there are three dates with potential anomalies: August 1, 3, and 23. Calculating hydrogen sulfide levels using AQMD data on August 1 and 3, 2021 with the average dilution rate of 89.55 would be lower than the LA Sanitation peaks on those days. The actual dilution on those dates is obviously much higher than the average dilution rate. Those two dates in the table use the LA Sanitation test data. AQMD does not appear to have any test data for hydrogen sulfide, 5 minutes, on August 23, 2021. The only peak we could include is based upon LA Sanitation data, which is substantially lower as the chart shows a dip on that day.

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of the investigation that AQMD should consider. LA Sanitation appears to be down playing the exposures without any consideration of the impact of its representations on the community.

The fact that AQMD issued a total of 39 notices of violation to LA Sanitation should be proof enough to LA Sanitation that it created a nuisance that caused injury to numerous residents living near Hyperion. LA Sanitation's conduct in first failing to provide proper testing and then failing to provide accurate information to residents creates distrust in the community. This is particularly true when the other potential emissions remain a mystery.

We are requesting AQMD's help. People need accurate information to obtain proper medical care, and it appears that LA Sanitation does not recognize its obligation to provide that information. AQMD has the ability to calculate the dilution rates and exposures, and this information is vital to both AQMD's investigation and public health.

Thank you again for protecting residents in El Segundo.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Rex Parris". The signature is written in a cursive, flowing style.

R. Rex Parris