

STATEMENT OF PROCEEDINGS
SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT HEARING BOARD
Regular Meeting, Thursday, January 26, 2023
9:00 a.m.

ORDER OF BUSINESS

ROLL CALL

Members present: Vilmarie Rodriguez, Chair; Alison Schlick, Vice Chair, Jose Gonzalez William Powers, and Daniel Spencer

Members absent: N/A

Staff present: Julie Byford, APCD Civil Actions Investigator; Mary Mahoney, APCD Civil Actions Investigator; Scott Nester, APCD Civil Actions Investigator; William Jacques, APCD Chief Departmental Operations Compliance; Veera Tyagi, Senior Deputy County Counsel APCD; Emily Helms, Senior Deputy County Counsel APCD; and Mia Ruffier, APCD Clerk of the Hearing Board

SWORN OATH OF WITNESSES BY CLERK

All witnesses providing public testimony during the meeting were sworn-in by the Clerk of the APCD Hearing Board.

ADMINISTRATIVE ITEM:

A. Public Communication.

No public testimony was provided to the Board.

B. Selection of Chairperson and Vice Chairperson for 2023.

ACTION:

ON MOTION of Member Schlick, seconded by Member Powers, the Air Pollution Control District Hearing Board elected APCDHB Chair, Vilmarie Rodriguez.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer

ACTION:

ON MOTION of Member Rodriguez, seconded by Member Powers, the Air Pollution Control District Hearing Board elected APCDHB Vice Chair, Alison Schlick.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer

C. Approval of Statement of Proceedings for January 12, 2022.

ACTION:

ON MOTION of Member Spencer, seconded by Member Powers, the Air Pollution Control District Hearing Board approved the Statement of Proceedings for the meeting of January 12, 2023 as amended.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer

D. Petitioner Progress Update for Petition 4521 City of San Diego, Point Loma Wastewater Treatment Plant.

ACTION:

ON MOTION of Vice Chair Schlick, seconded by Member Spencer, the Air Pollution Control District Hearing Board accepted Petitioner Progress Update for Petition 4521.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer

PETITION(S) BEFORE THE BOARD:

4527 San Diego County Air Pollution Control District, County of San Diego Abatement Order against Respondent NEW LEAF BIOFUEL.

ACTION:

ON MOTION Vice Chair Schlick, seconded by Member Powers, the Air Pollution Control District Hearing Board accepted the District's Presentation as Exhibit 1.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer

ACTION:

ON MOTION Member Spencer, seconded by Member Powers, the Air Pollution Control District Hearing Board accepted the Respondent's Presentation as Exhibit 2.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer

ACTION:

ON MOTION Member Schlick, seconded by Member Powers, the Air Pollution Control District Hearing Board accepted updates on Petition 4527 and directed the District and Counsel for the Hearing Board to define the legal standard for a Nuisance for the February 23, 2023 regularly scheduled Hearing Board meeting.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer

ADJOURNMENT:

The APCD Hearing Board adjourned the January 26, 2023 meeting at 10:20 a.m.

ASSISTANCE FOR THE DISABLED:

Agendas and records are available in alternative formats upon request. Contact the APCD Hearing Board Clerk at 858-586-2600 with questions or to request a disability-related accommodation including sign language interpretation. To the extent reasonably possible, requests for accommodation or assistance should be submitted at least 72 hours in advance of the meeting so that arrangements may be made.

Pursuant to Government Code 54957.5, written materials distributed to the Hearing Board in connection with this agenda less than 72 hours before the meeting will be available to the public at the San Diego County Air Pollution Control District, 10124 Old Grove Road, San Diego, CA 92131.

The statements contained in this draft document are subject to change until they are approved in their final form by the Air Pollution Control District Hearing Board at a subsequent public meeting.

ADMINISTRATIVE ITEM:

A. Public Communication

ACTION:

No public testimony was provided to the Board.



MIA RUFFIER

Clerk of the San Diego County Air Pollution Control District Hearing Board

ADMINISTRATIVE ITEM:

B. Selection of Chairperson and Vice Chairperson for 2023

ACTION:

ON MOTION of Member Schlick, seconded by Member Powers, the Air Pollution Control District Hearing Board elected APCDHB Chair, Vilmarie Rodriguez.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer

ACTION:

ON MOTION of Member Rodriguez, seconded by Member Powers, the Air Pollution Control District Hearing Board elected APCDHB Vice Chair, Alison Schlick.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer



MIA RUFFIER

Clerk of the San Diego County Air Pollution Control District Hearing Board

ADMINISTRATIVE ITEM:

C. Approval of Statement of Proceedings/Minutes for January 12, 2023

ACTION:

ON MOTION of Chair Rodriguez, seconded by Vice Chair Schlick, the Air Pollution Control District Hearing Board approved the Statement of Proceedings for the meeting of January 12, 2023 as amended.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer



MIA RUFFIER

Clerk of the San Diego County Air Pollution Control District Hearing Board

ADMINISTRATIVE ITEM:

- D. Petitioner Progress Update for Petition 4521 City of San Diego, Point Loma Wastewater Treatment Plant

ACTION:

ON MOTION of Vice Chair Schlick, seconded by Member Spencer, the Air Pollution Control District Hearing Board accepted Petitioner Progress Update for Petition 4521.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer



MIA RUFFIER

Clerk of the San Diego County Air Pollution Control District Hearing Board

**COUNTY OF SAN DIEGO
AIR POLLUTION CONTROL DISTRICT HEARING BOARD
BOARD ORDER**

4527 San Diego County Air Pollution Control District, County of San Diego Abatement Order against Respondent NEW LEAF BIOFUEL..

Notice of time and place of hearing was given as required by law.

ACTION:

ON MOTION Vice Chair Schlick, seconded by Member Powers, the Air Pollution Control District Hearing Board accepted the District's Presentation as Exhibit 1.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer

ACTION:

ON MOTION Member Spencer, seconded by Member Powers, the Air Pollution Control District Hearing Board accepted the Respondent's Presentation as Exhibit 2.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer

ACTION:

ON MOTION Member Schlick, seconded by Member Powers, the Air Pollution Control District Hearing Board accepted updates on Petition 4527 and directed the District and Counsel for the Hearing Board to define the legal standard for a Nuisance for the February 23, 2023, regularly scheduled Hearing Board meeting.

AYES: Rodriguez, Schlick, Gonzalez, Powers, Spencer



MIA RUFFIER

Clerk of the San Diego County Air Pollution Control District Hearing Board

**01.26.23 APCD HB
Petition 4527 – Exhibit 1**



Stipulated Abatement Order Update

San Diego County Air Pollution Control District

Petition No. 4527

Hearing Board Meeting: January 26, 2023

2023



Stipulated Abatement Order (SAO) Update

1. District's Engineering Evaluation

2. Complaints & District Investigations

3. Odor Survey Results



1. District's Engineering Evaluation

- District Engineering Insp. 12/21/22:
 - No issues found with Odor Reduction System (ORS)
 - Pressure gauges replaced
- Start Up Authorization issued 1/4/23:
 - Established pressure baseline
 - Revise conditions for H₂S analyzers
- 30-Day Odor Report:
 - No odors detected



Photo: ORS Carbon Canisters 12/21/22



2. Complaints & District Investigations

Before the ORS



32 Complaints




12 Complainants
(1 anonymous)

After the ORS



33 Complaints
(+ 1 complaint)



12 Complainants
(1 anonymous)
(no change)

2. Complaints & District Investigations

Before the ORS



80 Odor Surveys Conducted



75 Nuisance Odors Found

After the ORS



17 Odor Surveys Conducted



0 Nuisance Odors Found

2. Complaints & District Investigations

- The District Conducted Three Onsite Facility Inspections:
 - Monday 12/23/22: No violations found
 - Wednesday 1/11/23: No violations found
 - Tuesday 1/24/23: No violations found



3. Odor Survey Results

Before ORS: 11/23/21 to 12/1/22

Odor Classification	No.	%
No Odor	7	4.3
Very Faint	4	2.5
Faint	30	18.8
Distinct	56	35.0
Strong	48	30.0
Very Strong	15	9.4
Total:	160	100%

After ORS: 12/2/22 to 1/25/23

Odor Classification	No.	%
No Odor	16	47.1
Very Faint	12	35.3
Faint	5	14.7
Distinct	1	2.9
Strong	0	0
Very Strong	0	0
Total:	34	100%

3. Odor Survey Results

- Most recent odors near residents with ORS operating:

December Odor Survey	Odor Intensity
12/2/22	No Odor
12/5/22	Very Faint
12/6/22	No Odor
12/7/22	Faint
12/13/22	Very Faint
12/22/22	Very Faint
12/23/22	No Odor
12/28/22	Very Faint
12/30/22	No Odor

January Odor Survey	Odor Intensity
1/4/23	No Odor
1/6/23	Very Faint
1/11/23	No Odor
1/13/23	No Odor
1/17/23	No Odor
1/20/23	No Odor
1/24/23	No Odor
1/25/23	No Odor



Conclusion

- Odors reduced in intensity and frequency since ORS operation
- No new odor nuisance dates documented
- The District will continue to conduct investigations to ensure ORS effectiveness
- The District and New Leaf will work together to monitor and mitigate any future odor nuisances, if applicable
- Next progress update on February 23, 2023





Stipulated Abatement Order Update on Effectiveness

San Diego County Air Pollution Control District

Mary P. Mahoney
Civil Actions Investigator

2023



**01.26.23 APCD HB
Petition 4527 – Exhibit 2**



Odor Control System
Operation 12/2/22-1/22/23

- Installation completed, filter operational and Construction Complete Notice 12/2/22.
- Fully commissioned with all operational checks completed 12/6/22. (Filter ran uninterrupted from 12/2/22)
- As of 12/31/22 the **baseline pressure drop across the carbon filters was established at 21 inches water gauge. This sets the carbon replacement threshold at 25 inches water gauge pressure drop.**
- Pressure drop is the difference in air pressure in the duct before and after the filters at points A&B and C&D on the diagram and gets higher if filter material becomes clogged.
- Pressure drop also indicates airflow. Any sudden change indicates abnormal operation.





Compliance Records

January Odor Management Program																																																				
Inspection	Check all oil tanks are fully closed other than required fill/discharge relief		Pipe, pump, valve leaks		All unnecessary items removed from processing areas		Inside floor condition clean		Unloading & loading area - drips, spills, pavement condition		Building frontage pavement, drips, stains, tracking		Accumulation of oil other process materials on surfaces other than floors		Inside spill remedy		Inside floor surfaces - non greasy, degreaser applied to all oil spills, fully vacuum cleaned		Water leaks/pools removed		Spill removal and finish by vacuum		Outside loading/unloading area spill remedy		Outside loading & unloading area full clean		Building frontage pavement cleaning		Clean up of any other process material accumulations on non-floor surfaces		Only waste and rags stored only in the provided enclosed and plastic lined containers, emptied daily		General Odor Check of Facility		H2S sniff on an		DP Across North Carbon Bed		DP Across South Carbon Bed		Comments (any spills, deviations, opening of rollup doors and maintenance on ORS or issue that arise, please annotate here - time, details etc.)											
	Frequency	Start-mid-end	Start-mid-end	Every shift	Start-mid-end	Every 2-3 hours	Every shift	Every shift	1 hour	Every shift	1 hour	All spills ASAP	1 hour	Every shift	Daily	Daily	At all times	Every Shift	Every shift	Every shift	Every shift	Every Shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift	Every shift												
Data/Shift	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night	Day	Night										
1/1/23	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	0	0	21	20	21	21	Night shift, we have water from the rain			
1/2/23	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	0	0	0	21	20	21	21			
1/3/23	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	GS	RL	0	0	0	21	20	21	21			
1/4/23	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	0	0	0	21	20	21	21			
1/5/23	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	0	0	0	21	20	21	21			
1/6/23	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	0	0	0	21	20	21	21			
1/7/23	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	DS	NS	0	0	0	21	21	21	21			
1/7/23	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	0	0	0	21	21	21	21			
1/8/23	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	DS	RL	0	0	0	21	21	21	21			
1/8/23	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	0	0	0	21	21	21	21			
1/9/23	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	0	0	0	21	21	21	21			
1/10/23	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	GS	WS	0	0	0	21	21	21	21			
1/11/23	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	DA	JR	0	0	0	21	21	21	21			
1/12/23	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	pc	RL	0	0	0	21	21	21	21	2001 sugar bin was vacuummed		
1/13/23	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	0	0	0	21	21	21	21	west roller door open for man lift. PD 0.3mmWG
1/14/23	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	pc	WS	0	0	0	21	21	21	21	scrubbed back south floors		
1/15/23	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	AS	WS	0	0	0	21	21	21	21			

Inspection and Housekeeping Checklist per 12-hour shift.

External odor check start of every shift.

Odor Control System operational data and H2S data every shift.

It was decided to include all the elements of the 30-day "Condition 4" compliance report in the daily odor management program to ensure any case of non-compliance can be addressed promptly.

- The odor control system has run continuously since 12/2/22 except for four hours needed to install service slides.
- These slides make it possible to isolate one filter unit for carbon replacement while the other continues to operate so there is not interruption of odor control.
- A spare fan motor and other fan critical spares have been obtained.



Odor Control System Initial Performance and Compliance Baseline Report

Reporting Period

December 1, 2022, to January 22, 2023

History

- ATC for carbon filter system received 10/13/22
- Installation complete other than fan, 11/17/22
- Fan received 11/30/21
- Installation completed, filter operational and Construction Complete Notice 12/2/22.
- Fully commissioned with all operational checks completed 12/6/22. (Filter ran uninterrupted from 12/2/22)
- As of 12/31/22 the baseline pressure drop across the carbon filters was established at 21 inches water gauge. This sets the carbon replacement threshold at 25 inches water gauge pressure drop.

Compliance Record and Baseline Data for the South Plant and Odor Control System (OCS)

Condition	Compliance History
1. Equipment and materials do not deviate from ATC	100%
2. No nuisance from South Plant	100% based on APCD advice.
3. OCS in good operating condition, notice of >24 hr shutdown for maintenance, maintenance log	100% - one 4 hour shut down for isolation slide installation notified to APCD.
4. Inspect monitor and evaluate control efficiency of OCS monthly	100%. See attached report.
5. Differential pressure measured across filter daily.	100%
6. H2S measured weekly, not to exceed 1PPMV.	100%
7. H2S measurement by approved meter.	Details provided and awaiting condition revision from APCD.
8. Replace carbon if pressure drop increases 4 inWG above baseline.	See baseline in History above. No increase detected at 1/22/23.
9. Activated carbon shall be replaced at least every 11 months	Due before 11/2/23
10. Carbon service life records to be kept.	N/A
11. South Plant to be kept under negative pressure.	100% established by handheld device. Note the pressure difference is very small (0.2-0.5mmWG)
12. South Plant equipped with permanent pressure differential gauge.	Yes, and shows a pressure difference but the industrial gauge sourced is not sensitive enough to be useful as an alarm. A specialist HVAC gauge has been ordered. Differential pressure is also checked weekly by handheld device.

13. Pressure readings each time the roll up doors are opened.	100% See 12 above. To avoid any issue processing was stopped on the two occasions the doors needed to be opened.
14. All doors remain closed at all times other than for ingress and egress of personnel	100% When opened man doors have measured flow >250fpm into the building.
15. Plastics strips mounted across all doors	100%
16. Process covers closed at all times.	100%
17. UCO containers covered	100%
18. Equipment used for VOC containing materials inspected for leaks daily	100%
19. Oil transfers to minimize leaks and all leaks cleaned up ASAP	100%
20. Cleanup/housekeeping only when OCS operational.	100% OCS has operated continuously except for the short period in 3. Above.
21. Visible emissions from OCS stack comply with Rule 50	100% - no visible emissions.
22. Notify breakdown condition of OCS to APCD	N/A
23. Retain records for 3 years and make available to APCD	100%
24. Access and other assistance to ACPD on request.	100%
25. Comply with other agency permit requirements	100%
26. Comply with Air Toxics "Hot Spots" Information and Assessment Act.	100%

Condition 4

The Permittee shall inspect, monitor and evaluate the control efficiency of the odor control system once every 30 days upon issuance of the Authority to Construct and made available to District personnel upon request, so that detectable odor is not present outside the property boundary. If the proposed odor control system is not capable of controlling the odorous compounds that are released from the building, the owner or operator shall propose a new or additional odor control system and implement permanent corrective actions upon District approval. (Rule 51)

Condition 4 Records 12/6/22 – 1/22/23

Date	Persons Responsible	Observations
12/6/22	Chris White COO New Leaf Johnny Lockwood, Baghouse Services	Commissioning testing and inspection. <ul style="list-style-type: none"> • Airflows out of South Plant into the OCS were at specified volumes and rates. • Airflows in the OCS ducting were at the specified rates. • No detectable odor from the OCS discharge. • No H2S detected in the discharge. • Manual pressure-drop readings for carbon at 20.6 inWG • OCS damper fully open. • No detectable odors at building boundary.
12/5/22	Pedro Palting, Plant Manager New Leaf Junior Alfaro, APCD	<ul style="list-style-type: none"> • Performed plant inspection with APCD and reviewed compliance spreadsheet – no odors or deviations
12/7/22	Pedro Palting, Plant Manager New Leaf Vanessa Salazar, APCD	<ul style="list-style-type: none"> • Performed plant inspection with APCD and reviewed compliance spreadsheet – no odors or deviations
12/23/22	Roberta Afrifa, Process Engineer New Leaf Junior Alfaro, APCD	<ul style="list-style-type: none"> • Performed plant inspection with APCD and reviewed compliance spreadsheet – no odors or deviations
1/5/22	Chris White, COO New Leaf	<ul style="list-style-type: none"> • All operational data in compliance. • No change in OCS carbon element pressure drop. • No detectable odor in OCS discharge • No detectable odor at building boundary.
1/11/23	Pedro Palting, Plant Manager New Leaf Vanessa Salazar, APCD	<ul style="list-style-type: none"> • Performed plant inspection with APCD and reviewed compliance spreadsheet – no odors or deviations

- The most sensitive industrial meter on short lead time was sourced and installed.
- It shows a reading but as the normal pressure difference is only 2% of the instrument scale, the instrument is not precise enough to reliably operate an alarm when pressure differences do not meet the required condition.
- A specialized instrument has been ordered but has a longer lead time. Planned completion for this installation and alarm set up is late February.
- In the meantime, the facility is in compliance.

- New Leaf observations record successful control of odors from the South Plant.
- All permit conditions have been met and sustained.
- Four APCD inspections have found compliance and not reported (to NLB) any odor issues.
- NLB has not received any complaints directly.



Questions

01.26.23 APCD HB
Petition 4527 – Public Speakers

4527	NEW LEAF UPDATE		
		Nicholas	Paul