



South Coast
Air Quality Management District

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Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

**Draft Environmental Assessment (EA) for the Proposed Cabazon-Colmac Biomass
Power Plant Lease Amendment and Facility Expansion**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and, if possible, should be incorporated into the Final Environmental Assessment. However, in recognition of the fact that these comments are being sent after the close of the comment period specified by the lead agency, we request that at a minimum, these comments be included as part of the public record. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Susan Nakamura
Planning Manager
Planning, Rules and Area Sources

Attachment

SN:EE:GM

RVC090807-06
Control Number

Construction Air Quality Analysis

1. Although the lead agency has discussed preparation of a Fugitive Dust Control Plan on page 47, the potential construction emission impacts from the proposed project were not included in the Draft EA. On-road and off-road equipment emissions plus emissions from any soil disturbance during site preparation, any asphalt paving that might occur, etc., should be included in the Final EA. The analysis should also include any emission factors, equations and the methodologies used by the lead agency. Those short-term impacts should then be compared with the SCAQMD's recommended daily significance thresholds to demonstrate that short-term air quality impacts are less than significant. To calculate construction air quality impacts, the lead agency can use the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the SCAQMD's CEQA Air Quality Handbook or other methodologies as long as documentation is provided regarding the source and applicability to the project.

PM2.5 Significance Thresholds

2. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM2.5 significance analysis by following the guidance found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html. Further, SCAQMD staff has compiled mitigation measures to be implemented if impacts from fugitive dust, on- and off-road equipment impacts, or other pollutant air quality impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Operational Air Quality Analysis

3. In Appendix B, Air Quality Modeling Analysis and BACT Information, the lead agency has quantified operational emissions from the proposed project (wood-biomass fired boilers, etc.), which includes expansion from about 400,000 tons per year of materials including agricultural waste and waste wood to about 600,000 tons per year. Because this proposed expansion would also increase the number of trucks and truck trips delivering biomass to the project site (see page 41) as well as adding truck trips from hauling solid waste to the transfer station at Edom Hill Landfill (existing and proposed truck trips to the transfer station are not discussed in the Draft EA), operational emission impacts from these on-road mobile source emissions should be quantified and included in the Final EA. The SCAQMD therefore

recommends that the number and type or types of trucks by weight category (based on CARB EMFAC2007 category, i.e., heavy-duty diesel truck or heavy-heavy-duty-diesel truck), vehicle trips, and vehicle miles traveled be included in the Final EA along with the emission factors, methodologies, and equations etc. used to quantify these air quality impacts. Finally, any increase in on-site equipment usage because of the proposed expansion activity should also be quantified and included in the Final EA. When estimated, the additional operational air quality impacts should be consolidated with the operational emission estimates in the Draft EA and compared with the applicable SCAQMD recommended regional daily significance thresholds to determine if total operational impacts are significant (page 38).

The lead agency can access the most current CARB emission factors for on-road vehicles at the following website:

http://www.aqmd.gov/ceqa/handbook/onroad/onroadEF07_26.xls . The most current off-road emission factors from CARB can be accessed at:

<http://www.aqmd.gov/ceqa/handbook/offroad/offroad.html> . Alternatively, the lead agency could use the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the SCAQMD's CEQA Air Quality Handbook. Mitigation measures are available for consideration by the lead agency for off- and on-road engines and fugitive dust can be found at

http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html , if needed.

Odors

4. On page 30 (see also Figure 6 - Regional Roadway Network), the lead agency states that there are limited residential uses located to the northeast and southeast, outside of the project area on unincorporated County land. Because of the nature of the biomass throughput and the proposed increase in project activity, the lead agency should discuss any potential odor impacts from the proposed increase in biomass throughput and the lead agency's compliance with SCAQMD Rule 402 – Nuisance.

1. On page 13 in the Initial Study in Appendix A of the Draft EIR, the lead agency estimated operational air quality impacts using the URBEMIS 2002 version 8.7 computer model but based its conclusion that construction air quality impacts would be insignificant by using the screening tables in Chapter 6 of the SCAQMD's CEQA Air Quality Handbook (Handbook). The SCAQMD has not supported the use of the Handbook Land Use screening tables for a number of years because those screening tables were derived using an old version of the on-road mobile source emission factor model, EMFAC7EP, and trip rates are based on an old version of the Institute of Traffic Engineers Trip Generation Manual. As a result of relying solely on those tables, instead of quantifying air quality impacts, the lead agency has not demonstrated that project air quality impacts are less than significant. Therefore, the SCAQMD recommends that the lead agency demonstrate that project impacts are less than significant in the Final EIR by estimating short-term air quality impacts.

To calculate the proposed project's emission impacts, the lead agency can utilize the current URBEMIS 2007 version 9.2.2 land use emissions model, which is an updated version of the URBEMIS model and was originally released in June 2007. The URBEMIS 2007 model includes updated on-road and off-road mobile source emission factors, as well as other enhancements. URBEMIS 2007 version 9.2.2 can be accessed at <http://www.aqmd.gov/ceqa/models.html> or the lead agency can follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook. Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures to be implemented if the air quality impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html