



MOUNT SHASTA BIOREGIONAL ECOLOGY CENTER

Since 1988, preserving nature, spirit and heritage on and around Mount Shasta

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January 22, 2009

Eldon Beck, Assistant Air Pollution Control Officer
Siskiyou County Air Pollution Control District
525 So. Foothill Dr.
Yreka, CA 96097

Public Comment
Authority to Construct – Temporary Permit to Operate
Roseburg Forest Products Biomass Power Plant Project, Weed, CA

Dear Mr. Beck:

Thank you for the opportunity to submit these comments regarding Roseburg Forest Products application for a permit to operate a biomass cogeneration power facility in Weed, CA. As you are aware, Roseburg's project will emit hundreds of tons of new air pollutants into the South County air basin daily, and burn the equivalent of 250 cords of wood per day, at the edge of downtown Weed. The project is located extremely close to residences— within a few hundred feet of some homes, and within ¼ mile of the elementary school. Therefore, to protect public health and safety, it is imperative that air pollution regulations are followed strictly.

New studies indicate more harm to health from air pollutants than previously known - especially to women and children

Air quality standards are set to protect human health, and are based on studies of how various pollutant types and levels harm health. But recent new information shows that air pollutants are far more dangerous than previously believed, and especially to woman and children. Fine and ultrafine particulate matter from wood burning has been shown to travel miles from its source, and imbed deeply in the lungs, where it is associated with increased diseases such as cancer, heart attack, stroke, and other diseases exacerbated by “oxidative stress.”¹ Another recent study showed that living in more polluted air significantly decreases life span². Most past studies have evaluated pollutants impacts on adults, not children. Yet a doctor from Mt. Sinai Hospital has found that children are 10 times more affected than adults from toxic pollutants in the air.³

¹ Oberdorster, Gunter, and others. "Nanotoxicology: An Emerging Discipline Evolving from Studies of Ultrafine Particles." *Environmental Health Perspectives* Vol. 113, No. 7 (July 2005), pgs.

² <http://content.nejm.org/cgi/content/full/360/4/376> *Fine-Particulate Air Pollution and Life Expectancy in the United States*, *New England Journal of Medicine*, January 22, 2009, Vol. 360:376-386, , No. 4, Pope, Ezzati, and Dockery. *Conclusions-* A reduction in exposure to ambient fine-particulate air pollution contributed to significant and measurable improvements in life expectancy in the United States.

³ *Youngest students often most vulnerable to toxic air*, USA Today, December 22, 2008. Dr. Philip Landrigan, pediatrician working with Mt. Sinai School of Medicine says “children are 10 times more susceptible than adults” to

1. Current proposed pollution control is not “best available” at only 35% emissions reduction

The Mount Shasta Bioregional Ecology Center disagrees that the SNCR system as proposed for the project represents “Best Available Control Technology” for the facility. As noted in comments submitted by the CA Air Resources Board (8-13-2008) and air quality consultant Dr. Petra Pless (11-10-2008), a superior technology exists designed specifically for wood-fired biomass plants, known as RSCR, which reduces emissions by 73%, more than double Roseburg’s proposed system. This is the system that should be required for this project.

2. No baseline air quality data for Weed – needs to be done first

It is impossible to know the full impact Roseburg’s proposed burning operations will have on South County air quality, because the county has chosen not to measure current local air quality conditions in Weed, which has the worst air quality in the County. Despite repeated requests, and then insistence by the public, no baseline air quality data exists for Weed, where the Roseburg facility now is the largest stationery source of pollution in the South County with their current wood-fired boiler operations. It is not reasonable for the purposes of this permit to use air quality measurements taken from county locations distant from Weed, such as Lava Beds and Yreka. Measurements need to be taken of local current conditions before a proper evaluation for purposes of this permit issuance can occur.

3. Particulate matter data (PM 10) for Weed must be made public

It is becoming increasingly well known of the danger that particulate matter (PM), especially fine PM, poses to human health. Burning of wood by the facility will significantly add to dangerous PM in South County. Because of Roseburg’s proposed expansion to double their wood burning operations (and a first attempt to build it with no environmental review, which the county supported), at public insistence, a portable PM 10 monitor was placed in Weed in October of 2007. The intention was that this data would be helpful in the EIR air quality analysis, as well as this ATC permit. Yet, despite repeated requests for these records in 2008, this critical data has yet to be seen by the public. No air quality permit should be issued until this PM 10 data from Weed, now collected for well over a year, be made public. It is unreasonable and suspect to continue to withhold this data from the public.

4. Improper (and misleading) emission data used for Roseburg’s current operations

It is the APCD’s duty to determine what impacts Roseburg’s expanded project will have on Weed air quality. But it cannot do that when it uses numbers that have no basis in reality, which is the case. So instead of getting a realistic idea of actual impact on air quality in Weed, we get the well-referenced adage:

“Garbage in = garbage out”
(Inaccurate data input = Inaccurate results)

Before issuing a permit for an applicant to pollute the air, the air district has the responsibility of knowing what “current conditions” are, and what the current emissions are for current Roseburg

toxic chemicals. He says their bodies are still developing, they breathe more air per pound, and spend more time outdoors than adults.

operations. In order to know the true expected impact of the new power plant one must do a simple calculation:

The correct way:

Total estimated project emissions - current actual emissions now occurring = additional pollution from project

This has not been done. Instead of using actual, current emissions from the Roseburg veneer plants, Roseburg’s consultants improperly used hypothetical data, called the “Potential to Emit” or PTE. This PTE refers to the pollution that would occur if Roseburg operated their boiler at full capacity, all the time. But they don’t. They have operated it at about half capacity, since it was installed in 1996 (other than a few tests that may have been made). But it suits Roseburg’s purposes to state that the emissions are not what has actually happened, but instead what might have happened had they doubled their wood burning over the past 12 years. The air district, for purposes of this permit, has accepted air pollution data that doesn’t exist in reality:

Incorrect way:

Total estimated project emissions - “PTE” fabricated emissions that *might have* occurred if the boiler had been burning twice as much wood than it actually has for 12 yrs. = incorrect pollution data (lower number that helps Roseburg justify substandard technology)

This PTE “Potential to Emit” data *does not* represent what is and has been actually occurring in Weed since 1996 when the larger boiler was installed (and did not go through a CEQA process, as it should have). It is misleading both to the public, and in the ensuing analysis that are based on these critical “input” numbers. In fact, it skews the entire analysis, making it incorrectly appear that the new project will emit far fewer new pollutants than it actually will. It makes the increase in pollution from Roseburg’s project appear to be smaller than what it actually will be, which is then used to justify installation of the inferior SNCR pollution control equipment.

The air district’s refusal to obtain of baseline air quality measurements for Weed, the refusal to release PM data for Weed, and the support of Roseburg to use current pollution numbers that don’t exist in reality gives the appearance that the air district is not doing its duty to protect air quality for citizens of Weed and south county, but is instead favoring and assisting Roseburg Forest Products in installing substandard emissions control technology.

5. Fugitive emissions – dust – inadequate mitigations

“Fugitive emissions” (dust) that RFP currently emits in Weed neighborhoods from their current operations, and that will likely double with proposed expansion, has not been adequately described, quantified and mitigated for the purposes of this ATC permit. Uncovered piles of wood chips decompose over time, releasing wood dust, or “fugitive emissions” into the air, exacerbated by the wind, which has been a frequent and sore complaint of neighbors downwind. These fugitive emissions will greatly increase with the Project, with new massive piles of decaying, uncovered biomass. No mitigation methods are offered to control this, such as covering or otherwise managing the piles to reduce emissions.

The EIR never identified nor quantified the large amounts of dust that RFP currently emits in Weed neighborhoods, and that numerous residents have testified about. That dust is not measured by the APCD's PM10 testers because it is comprised of particles generally larger than 10 microns. There already are existing air impacts in the surrounding neighborhood as documented in written and oral comments.

The FEIR inadequately addressed our comments on these and future increased fugitive dust emissions. The FEIR claims that fugitive emissions would be regulated by air permit condition 12 and mistakenly claims that "it is not appropriate for characterization as an additional mitigation measure." A regulation or condition does not waive the need for mitigations, if anything, the regulation sets the CEQA standards that the mitigation measures must meet.

6. Incorporate testimony from professional air quality consultant Dr. Petra Pless

We specifically request that the air quality comments submitted by Dr. Petra Pless be incorporated into the permit decision process. This report was submitted to your offices in a comment later by Mount Shasta Tomorrow on December 4, 2008, and we incorporate it by reference into these comments. Specifically, we point out from her expert comments:

- the project will result in exceedances of ambient air quality standards,
- the project's net daily emission increases exceed your agency's (SCAPCD) significance thresholds for new and stationary sources,
- the facility is a major source and project emissions exceed the PSD significant increment thresholds requiring a PSD Review,
- that the EIR underestimates post-modification emissions of PM10, PM2.5 and CO from the boiler,
- the EIR fails to identify the reducing agent for the SNCR and fails to quantify and evaluate ammonia slip,
- the EIR's health risk assessment is based on industry-generated emission factors that are not conservative,
- that the EIR's health risk assessment fails to include a number of toxic air contaminants,
- that the EIR fails to evaluate acute non-cancer risks,
- the EIR fails to identify exceedances of state 24-hour PM10 ambient air quality standard

We also incorporate by reference all previous public comments concerning air quality submitted by MSBEC and others regarding the Roseburg Biomass UP-07-05 submitted through the County's environmental review process, including any appeals.

7. Incorporate Air Permit ATC into CEQA Review Process

It is inefficient and ineffective to separate the ATC process from the CEQA review process, and does not result in the kind of transparency to the public for which CEQA exists. Critical documents to air quality were withheld by the APCD and not made available to the public during the CEQA review process. For example, the analysis of the SNCR vs. the superior RSCR was not available through the CEQA review process. The public only learned of this by requesting documents from our state Air Board, after the EIR had been approved by the County. The result of this kind of separation in the review process is that the public is not as well informed, and the project doesn't receive the review that the law intended. We request that for future projects, the APCD coordinate its efforts with the CEQA process for greater efficiency, transparency, and full public disclosure of all documents.

Conclusion:

The ATC and Permit to Operate should not be issued for Roseburg's current proposal. The Air District should:

1. Immediately measure and assess Weed air quality to establish a meaningful baseline
2. Release all PM 10 data collected in Weed to the public, as requested
3. Calculate project emissions from actual emissions, rather than PTE (Potential to Emit)
4. Require Roseburg to install the superior RSCR pollution control technology
5. Measure current fugitive dust emissions, estimated total project fugitive dust emissions, and require mitigations that effectively reduce dust.
6. Properly include diesel emissions in project emission calculations.

Please take these issues into serious consideration as you review the application for an "Authority to Construct/Temporary Permit to Operate" application for this Roseburg project.

We request you provide the Mount Shasta Bioregional Ecology Center written notice and an opportunity to review any additional aspects of this Project that your agency considers.

Sincerely,

Michelle Berditshevsky

Michelle Berditshevsky
Executive Director

Karen Rogers

Karen Rogers
Board of Directors