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December 1, 2006

Mr. Laki Tisopulos  
Assistant Deputy Executive Officer  
**South Coast AQMD**  
21865 Copely Drive  
Diamond Bar, CA 91765

**Re: California Mining Association Comments on Draft 2007 AQMP**

**JEF130**

Dear Mr. Tisopulos:

This letter transmits verbal comments made on behalf of the California Mining Association during the November 16, 2006 AQMP public workshop. Each comment is presented briefly below.

- Changes in the NAAQS PM-10 standards should be discussed earlier in the document than Chapter 10. In doing so, the term "natural crustal material" should be introduced and discussed with respect to its limited health effects when compared to other types of PM-10 and to PM2.5.
- "...emission reductions resulting from District regulations adopted by June 30, 2006 are included in the emission forecasts." (p. 3-1.) However, changes to the Rule 1157 emission inventory are not detailed in Appendix III, Table 1-4 which is where we think they should be presented. Also, emissions reductions reported in Tables 1-2 and III-1-1 are not consistent with reductions demonstrated in the emissions inventory agreed to by Industry and AQMD.

Based on subsequent conversations with AQMD staff it appears that the reductions in Tables 1-2 and III-1-1 are the SIP commitments, not actual reductions. The discussion of Rule 1156/1157 sources on Page III-1-14 is good but Table III-1-4 does not appear to include mineral processes which are the subject of those rules. According to staff, the 1156/1157 emission inventories were divided into several emission categories (e.g. unpaved roads, windblown dust, etc.) for inclusion in the AQMP. Yet we observe that the mineral processing category listed in Tables III-A-1 through III-C-10 appears to contain the entire inventory and not just the portion attributable to only mineral process sources. Accordingly, we suspect that sources which were dispersed elsewhere in the inventory (e.g. unpaved roads) may be double counted. Please provide clearer discussion of the 1157 emission inventory and its effect on the AQMP inventory.

- AP42 contains newly updated sections with PM2.5 / PM10 fractions that should be consulted and compared with the WRAP assumptions in the draft AQMP to determine whether changes are warranted.

- BCM-01 Comments
  - a. "This proposed measure seeks to further reduce PM emissions from add-on control devices previously identified to achieve PM reductions (e.g., BACT or command-and-control requirements)." (p. 4-16.) This statement is ambiguous but appears to be suggesting that this control measure will seek further reductions for existing operating control devices. We understand from the Workshop that the control measure would "not necessarily" result in new baghouses being installed. Please confirm under what conditions the control measure would result in new baghouses being installed.
  - b. AQMD Rule 404 controls particulate matter concentration in discharges from baghouses and other sources. BCM-01 does not mention Rule 404 or its effectiveness in already controlling baghouse emissions. We feel this should be discussed in the AQMP.
  - c. It is not clear and we ask clarification as to whether AQMD will be amending Rule 404 or implementing a suite of source-specific rules.
  - d. BCM-01 includes "Require enclosure of process equipment (i.e., aggregate processing) and conveyors." (p. IV-A-48.) During Rule 1157 rulemaking in 2005 and 2006, Industry demonstrated that this requirement was not operationally feasible or cost effective. We do not believe this situation has changed and believe AQMD should instead focus on specifying performance standards for ventilation and hood systems or other measures.

If you have any questions or comments please feel free to contact John Hecht or me 805.644.7976.

Respectfully submitted,

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**West Coast Environmental and Engineering**