

November 5, 2013

Millennium Bulk Terminals – Longview EIS  
c/o ICF International  
710 Second Avenue, Suite 550  
Seattle, WA 98104

RE: Scoping comments on Millennium Bulk Terminals – Longview, LLC  
Environmental Impact Statement

The Spokane Regional Clean Air Agency (SRCAA) is the agency responsible for enforcing federal, state, and local air pollution regulations in Spokane County. SRCAA's scoping comments on the Millennium Bulk Terminals – Longview, LLC (MBTL) Environmental Impact Statement (EIS) relate to the potential air quality impacts caused by the additional trains traveling through Spokane County. SRCAA has the following four primary air quality related concerns which warrant further evaluation in the EIS for the MBTL project:

**1) Increased diesel particulate matter emissions in Spokane County from additional locomotives**

Every train associated with the MBTL project will travel through Spokane County when hauling coal to the terminal and when empty traveling back to the mine. The primary pollutant of concern from trains is diesel particulate matter (DPM) which is emitted by the locomotives. DPM has been identified as a toxic air pollutant based on its potential to cause cancer, premature death, and other adverse human health effects. The EIS should evaluate the impacts from the DPM emitted by the additional locomotives which will travel through Spokane County, especially the impacts on receptors located near the rail lines in Spokane County. To assess the impacts from the increased DPM emissions on the receptors near the rail lines, dispersion modeling should be included as part of the EIS.

To mitigate the impacts caused by the additional DPM emissions, SRCAA recommends that all locomotives associated with the MBTL project (i.e., loaded trains hauling coal to the terminal and empty trains traveling back to coal mines) be required to meet EPA's Tier 3 or 4 emission standards. Line-haul locomotives meeting Tier 3 or Tier 4 emission standards would achieve a 50% or 90% reduction in DPM emissions, respectively, compared to older Tier 0 and Tier 1 locomotives. By mandating Tier 3 or 4 emission standards for all locomotives associated with the MBTL, the DPM emissions from the additional trains would be minimized.

**2) Increased emissions at BNSF railyard in Spokane caused by additional trains**

BNSF operates a railyard in Spokane County that would experience increased traffic and activities due to the additional trains that would travel through Spokane County in both directions (i.e., loaded and empty). At current operational levels, SRCAA believes that

the BNSF railyard may be causing adverse health effects on nearby receptors, based on a screening level study performed on the facility. The additional coal trains may increase the emissions from the railyard due to more idling trains and additional activities at the railyard. These additional emissions may cause increased adverse health effects on nearby receptors. The EIS should evaluate the impacts that the additional trains will have on the BNSF railyard in Spokane County, including a) quantifying emissions from increased idling that may occur due to the increase in train traffic, b) quantifying emissions that may occur from increased railyard activities caused by the additional trains, and c) evaluating the impacts from the railyard emissions on nearby receptors. To assess the impacts from the increased emissions at the railyard on nearby receptors, dispersion modeling should be included as part of the EIS.

**3) Increased emissions caused by vehicle idling at railroad crossings**

There are multiple railroad crossings throughout Spokane County that will likely experience more vehicles idling as a result of the additional trains traveling through Spokane County. The EIS should evaluate the increase in emissions resulting from the increased vehicle idling at railroad crossings to ensure that no violations of National Ambient Air Quality Standards will occur.

**4) Compliance with General Conformity Regulations and Washington State Implementation Plan**

Portions of Spokane County are currently designated as maintenance areas for PM10 and Carbon Monoxide (CO) and operate under Maintenance Plans which are approved under the Washington State Implementation Plan (SIP). As a result, the EIS should include a conformity evaluation to determine whether the MBTL project will comply with the General Conformity Regulations given in 40 CFR Part 93. As part of the conformity evaluation, calculation of direct and indirect emissions (i.e., emissions from locomotives, railyards, idling at crossings, etc.) resulting from the MBTL project in Spokane County is required. If the direct and indirect emissions from the project are above de minimis levels for PM10 and/or CO, a conformity determination is required to demonstrate the project will conform to the requirements of the Spokane PM10 and Carbon Monoxide (CO) Maintenance Plans, which are part of the Washington SIP.

SRCAA appreciates the opportunity to provide scoping comments on the EIS for the Millennium Bulk Terminals – Longview, LLC project. If we can provide additional input or information that would be useful in review of the project, please contact April Westby at (509) 477-4727, ext. 105 or [awestby@spokanecleanair.org](mailto:awestby@spokanecleanair.org). Thank you.

Sincerely,

**SPOKANE REGIONAL CLEAN AIR AGENCY**

William Dameworth  
Director

Cc: Millennium Bulk Terminals - Longview file