

LAKE COUNTY AIR QUALITY MANAGEMENT DISTRICT

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-MEMORANDUM-

To: Katherine Schaefer
Resource Planner
Community Development Department

DATE: October 12, 2023

FROM: Peter Helldorfer, Air Quality Engineer

SUBJECT: Scotts Valley Energy Corporation •• APN 004-010-04 •• UP 23-05, IS 23-10 •• Installation of a woody biomass processing and pyrolysis facility for the generation of electricity, biochar and syngas located at 755 E. State Highway 20, Upper Lake, CA 95485

The Lake County Air Quality Management District (LCAQMD) received a Request for Review for Sufficiency from the County of Lake Community Development Department for Scotts Valley Energy Corporation. The applicant proposes the installation of a woody biomass processing and pyrolysis facility for the generation of electricity, biochar and syngas located at 755 E. State Highway 20, Upper Lake, CA 95485.

The project parcel is not located in a mapped area known to contain serpentine rock and/or soils. The District and State of California Air Resources Board regulate surfacing and construction activities involving serpentine. Serpentine commonly contains regulated amounts of asbestos. If serpentine is discovered or is present during the course of grading or construction, all work shall stop until an approved serpentine dust control plan is in place.

Significant dust may be generated from vehicle traffic if driveways and parking areas are not adequately surfaced. Surfacing standards should be included as a requirement in the use permit to minimize dust impacts to the public, visitors, and road traffic. At a minimum, the District recommends chip seal for primary access roads and parking. Paving with asphaltic concrete is preferred. All areas subject to semi-truck / trailer traffic should require asphaltic concrete paving or equivalent to prevent fugitive dust generation. Gravel surfacing may be adequate for low use/overflow driveways and parking areas, however, gravel surfaces require more maintenance to achieve dust control, and permit conditions should require regular palliative treatment if gravel is utilized. White rock is not suitable for surfacing (and should be prohibited in the

permit) because of its tendency to break down and create excessive dust. Adequate dust mitigation measures must be in place such that a nuisance is not created.

Commercial burning is not allowed. All vegetative waste from land development must be disposed of by chipping or other appropriate methods.

Mobile diesel equipment used for construction and/or maintenance must be in compliance with State registration requirements. Portable and stationary diesel powered equipment must meet the requirements of the State Air Toxic Control Measures for Compression Ignition engines.

A complete list of all equipment which will be utilized at the site with the potential to emit air contaminants should be submitted to the LCAQMD including, but not limited to conveyors, chippers, grinders, generators, pumps, off-road equipment, etc. An Authority to Construct permit may be required for equipment with the potential for emissions to air. The pyrolysis facility will likely require a LCAQMD Authority to Construct permit. The applicant should contact the LCAQMD as soon as possible to reduce the potential for delays in obtaining any necessary LCAQMD permits.

Any demolition or major renovation is subject to the Federal National Emissions Standard for Hazardous Air Pollutants (NESHAP) for asbestos in buildings and requires asbestos inspections by a Certified Asbestos Consultant for all major renovations and all demolition. An Asbestos Notification must be submitted to the LCAQMD at least fourteen days prior to beginning any demolition work. The applicant should contact the LCAQMD for details. Regardless of asbestos content, all demolition activities should use adequate water to prevent dust generation and nuisance conditions

The Lake County Air Basin is presently in compliance with all of the State Ambient Air Quality Standards. This project is not expected to result in sufficient area-wide air quality impacts that would affect the County's air quality attainment status.

Given the above concerns are adequately addressed, the project as proposed with mitigation measures, can be supported for air quality concerns.