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Subject: follow up on emissions exceedances by biomass power plants

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Hi Heather, Stephanie, David, Quentin, Sammy and Raja,

Thanks so much for meeting with John and me yesterday about our IEPR comments. I wanted to follow up with information regarding your question about emissions exceedances by California biomass power plants.

As I mentioned, we analyzed emissions exceedances by biomass power plants based on air district records obtained through PRA requests. We received incomplete records which showed at least 2,034 cases of emissions exceedances and violations between 2015 to 2021 reported by 18 California biomass power plants. Emissions exceedances were for NOx, CO, and PM. I've included a more detailed summary below.

This analysis does not include data from EPA's ECHO database which would add more instances of air pollution violations by biomass power plants. To illustrate just a few violations:

Desert View: The EPA issued a notice of violation in 2022 to the Desert View biomass power plant in the Coachella Valley for repeated [emissions exceedances](#) of mercury, hydrochloric acid, carbon monoxide, sulfur dioxide, nitrous oxides, and opacity. The plant was the [largest single emitter of smog-causing pollutants](#) in the valley — producing nine times as much as the second largest source, a gas-fired power plant. Residents voiced concerns for years about smoke plumes from the biomass plant blowing over their homes, a school and a daycare center.

Blue Lake (now idle): The EPA in 2016 cited and fined the Blue Lake biomass power plant, located near Blue Lake Rancheria Indian Tribal lands, for [multiple air pollution violations](#). Tribal members,

especially children and the elderly, reported severe [health harms](#) from the air pollution from the plant.

Merced Power and Chowchilla biomass power plants in the San Joaquin Valley have been fined for [excess emissions](#) of nitrogen oxides and fine particulate matter.

Here's a summary of our analysis of excess emissions:

Records show that California's biomass plants frequently exceed their permitted emissions.

Between 2015 to 2021, at least 2,034 cases of emissions exceedances and violations were reported by 18 California biomass power plants, according to records obtained by the Center for Biological Diversity from air districts via Public Records Act requests. The records we received were incomplete and therefore represent an underestimate of excess emissions. Reported pollutants included NO_x, CO, and particulate matter (PM). The 18 biomass power plants are Burney Forest Products, Chowchilla, Collins Pine, DG Fairhaven, DTE Stockton, El Nido (Merced), Honey Lake, Humboldt Redwood Company, Mt. Poso, Rio Bravo Fresno, Roseburg Forest Products, Rio Bravo Rocklin, Sierra Pacific Industries (SPI) Anderson, SPI Burney, SPI Lincoln, SPI Quincy, Wheelabrator Shasta, and Woodland Biomass Power.

Of these 18 biomass power plants, four reported more than 200 instances of excess emissions during the reporting period: Honey Lake, Collins Pine, Humboldt, and SPI Quincy. Honey Lake had an average of 66.5 exceedances/year, followed by Collins Pine with 56.2 exceedances/year, Humboldt with 48 exceedances/year, and SPI Quincy with 47.4 exceedances/year. Across all 18 plants, the most common type of emissions exceedance was opacity. Opacity measures the reduction of light after passing through emitted smoke, and higher opacity indicates higher PM.

Emissions exceedances are incidents during which the biomass power plant exceeded its permitted pollution level. A single exceedance can last hours or multiple days. Emissions exceedances are in addition to the sizeable emissions from these power plants that are already allowed by permits.

We had to obtain information on facility exceedances and violations through public records act requests. This information should be made available and easily understandable to the public. For example, instead of summaries or organized information, we received hundreds of pdfs containing technical data presented in different formats that required extensive time and effort on our part to analyze and summarize. This data should be easily accessible to the public and presented in

summary format, as is already common practice in several states such as New Jersey. Community members should be able to readily access public records of pollution exceedances and violations that have implications for their health.

Please let me know if you have any questions or would like to follow up.

Very best,

Shaye

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