

PM₁₀ per day. Maximum fugitive dust emissions for the project site are therefore estimated to be 186 lb. PM₁₀ per day, decreasing to 121.9 lb. PM₁₀ per day and then to 102.8 lb. PM₁₀ per day.

4.2.2 Impacts from Transmission Line Operation

The newly installed transmission lines would require periodic maintenance of the transmission towers, insulators, and conductors. Operations and maintenance (O&M) would involve operators driving to the appropriate towers and performing the tasks required. This would generate additional traffic in the area, but should not be noticeable due to the existing traffic conditions generated mostly by the U.S. Border Patrol. Any increases in PM₁₀ generated by operations and maintenance procedures would be negligible.

4.2.3 Conformity Review

Section 176(c) of the Clean Air Act requires that federal actions conform to the appropriate State Implementation Plan (SIP). The final rule for “Determining Conformity of Federal Actions to State or Federal Implementation Plans” was promulgated by the U.S. EPA on November 30, 1993 (58 FR 63214), and took effect on January 31, 1994 (40 CFR Parts 6, 51, and 93). This rule established the conformity criteria and procedures necessary to ensure that federal actions conform to the SIP and meet the provisions of the Clean Air Act. In general, this rule ensures that all criteria air pollutant emissions and volatile organic compounds are specifically identified and accounted for in the SIP’s attainment or maintenance demonstration and conform to a SIP’s purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards and achieving expeditious attainment of such standards. If the action would be undertaken in a nonattainment or maintenance area, the provisions of the final rule for conformity apply.

The proposed action would be within an ozone and PM₁₀ nonattainment area in Imperial County. However, actions are exempted when the totals of direct and indirect emissions are below specified emissions levels [40 CFR §51.853(b)1]. The applicable level for PM₁₀ is 100 tons per year.

As illustrated in the preceding subsections 4.2.1 and 4.2.2, PM₁₀ emissions are considered to be the principal emissions from the construction and maintenance of the transmission lines in Imperial County, California, and total approximately nine tons in the year of construction, and much less in subsequent years for maintenance thereafter—totals that are considerably less than the specified level of 100 tons per year.

Additionally, the provisions of the final rule do not apply in a nonattainment area if the emissions of concern are less than 10 percent of this area’s total emissions [40 CFR

§51.853(i)]. The proposed action is considered to be a “regionally significant action” subject to full conformity analysis only if the emissions exceed the 10 percent threshold. The SIP total for Imperial County is approximately 19,000 tons per year of PM₁₀ (U.S. EPA 1999AIRData). The nine tons per year of PM₁₀ emissions estimated to result from the construction and maintenance of the transmission lines that comprise this project in Imperial County is considerably less than 10 percent of the regional emissions of 19,000 tons per year. Thus, pursuant to the provisions of 40 CFR §51.853(b)(1) and 40 CFR §51.853(i), the proposed action is exempt from any further review for conformity determination.

4.2.4 Power Plant Impacts

Both the SER and BCP transmission lines would export power to the United States from electric generating facilities located in Mexico. The SER transmission line would transmit power from the TDM turbines and the BCP transmission line would transmit power from the EBC turbine and the EAX turbine designated for export. Both power plants are located approximately three miles (5 kilometers) south of the international border. Both power plants have received the necessary environmental permits from the relevant Mexican regulatory agencies in accordance with Mexican regulations. The TDM turbines would consist of two natural gas-fired combustion turbines and would be used exclusively to export power over the SER transmission line to the U.S. The EBC turbine and the EAX turbine designated for export also are fired by natural gas and will be used to export power over the BCP transmission line to the U.S. A diagram of the relationships of the generation facilities and transmission lines is shown earlier in Figure 1.2.

4.2.4.1 Annual Emissions of Air Pollutants

The estimated maximum annual emissions of the criteria air pollutants NO₂, CO, and PM₁₀ are shown in Table 4.2.1. Listed are the annual emissions from the TDM facility, annual emissions from the EBC and EAX export units, as well as annual emissions from all four units at LRPC (i.e., the EBC and EAX export units plus the two EAX units used for Mexican power distribution to CFE).

The regulatory jurisdiction of the U.S. EPA does not pertain to air pollutant emissions in Mexico; nevertheless, a useful benchmark is found within U.S. EPA air permitting regulations and permitting guidance can be drawn upon to help assess the significance of these predicted increases from Mexican sources at the U.S. border and points north. In the context of permitting a major source or major modification in the U.S., U.S. EPA has established significance levels (henceforth SLs) for the criteria pollutants NO₂, SO₂, CO, and PM₁₀ below which a major source or modification will not be considered to cause or contribute to a violation of a NAAQS at any locality that does not meet NAAQS (40 CFR 51.165). In addition, U.S. EPA permitting guidance describes the impact area required