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April 4, 2008

Dr. Jean Ospital
Health Effects Officer
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765

Re: Comments on the draft Multiple Air Toxics Exposure Study (MATES III) report

Dear Dr. Ospital:

BNSF Railway is providing comments prepared by ENVIRON International Corporation (ENVIRON) on the draft MATES III report. We appreciate your responsiveness as well as that of South Coast Air Quality Management District (SCAQMD) staff in responding to information requests from ENVIRON, and in meeting with ENVIRON staff to discuss both the MATES III chemical mass balance (CMB) and regional modeling analyses. However, it is critical that we note that some requested information was not provided until March 28, leaving insufficient time for an adequate review. Furthermore additional requested critical data has yet to be received and SCAQMD has denied the request for an extension of the comment period.

BNSF believes that the data acquired for MATES III represent an important contribution to our understanding of air toxics in the South Coast Air Basin. However, ENVIRON's review of MATES III, identified a number of important technical questions whose resolution has the potential to substantively alter the analyses and conclusions presented in the draft report. These questions have been developed into a set of technical comments that address the (1) health risk approach, (2) chemical mass balance (CBM) methodology used to estimate diesel exhaust particulate matter [DPM], (3) air toxics monitoring, (4) regional modeling, and (5) emissions inventory. The San Pedro Bay Ports of Los Angeles and Long Beach (Ports) have submitted detailed comments on items 1, 2, 4 and 5.

Because BNSF does not believe there is a benefit in providing duplicate comments on MATES III to SCAQMD, we are limiting our present submittal to those additional comments that are unique to BNSF (with the understanding that SCAQMD will be addressing the comments submitted by the Ports). These additional comments, provided as Attachment 1 to this letter, address those elements of the MATES III air toxics monitoring program related to DPM, particulate matter less than 2.5 microns ($PM_{2.5}$), and the associated elemental carbon ($EC_{2.5}$), particularly as it relates to rail operations. ENVIRON's initial review identified potential inconsistencies between:

- Air monitoring data sets from stations operated by the California Air Resources Board (CARB) and by the Ports with those obtained for MATES III, and
- Monitored $PM_{2.5}$ and CMB results.