

## 23NOC1606 -- Comments from Pivot Point

Peter Riggs <peteriggspivotpoint@gmail.com>

Thu 1/18/2024 9:55 AM

To: Lauren Whybrew <lauren.whybrew@orca.org>

Cc: Jeff Johnston <jeff.johnston@orca.org>

 1 attachments (107 KB)

Pivot Point comments 23NOC1606 final.pdf;

Dear Ms. Whybrew --

Thank you very much for the presentation made at the Public Hearing on 16 January in Hoquiam, which was very informative for all attending. I trust you made it home to Olympia before the freezing rain set in!

Attached please find comments from Pivot Point, a WA-based 501c3 with a considerable history of work on renewable energy finance, biomass energy, and advanced biofuels development.

We remain deeply concerned about PNWRE's serious underestimation of Hazardous Air Pollutants, its failure to cite actual stack test data, and its failure to address HAP releases from the hammermill (pulverizing) stage of the wood pellet production process.

I am the Executive Director of Pivot Point and authorized to sign on behalf of the organization, after consultations with my Board of Directors.

Many thanks,

Peter Riggs  
Shelton WA

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## **Pivot Point**

18 January 2024

Lauren Whybrew, Phone 360-539-7610

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Reference Notice #: 23NOC1606

Thank you for the opportunity to comment on the Notice of Construction (23NOC1606) pertaining to the proposed wood pellet manufacturing plant in Hoquiam, Grays Harbor County. Pivot Point, a 501c3 organization registered in the State of Washington, has extensive experience with renewable energy finance, biomass energy, as well as advanced biofuels projects.

We appreciate ORCAA's serious effort to evaluate the air pollution implications of the pellet plant proposed by PNWRE. Because there is no precedent for an export-oriented wood pellet processing plant of this size anywhere in the Pacific Northwest, and because the pellet production process is multi-stage and involves the release of different pollutants at different stages, it is challenging to model those releases. However, we strongly disagree with ORCAA's statement that PNWRE's submissions are "appropriate for making regulatory determinations and estimating...air quality impacts."

The reference data provided by PNWRE does not comport with the reality of emission levels as already measured directly from similar-sized pellet facilities in the American South. Stack testing carried out by air agencies in Louisiana and Mississippi revealed much higher levels of Hazardous Air Pollutants (HAPs) than that modeled by PNWRE. Wood pellet plants in the South with half-million dry-ton/year (tpy) production capacity release approximately 40 tons of HAPs annually.

PNWRE is a relatively new corporation with no current facility 'footprint' in the state. At this time, a more established wood pellet manufacturer is also seeking an air discharge permit for a 400,000+ tpy facility in southwest Washington. This manufacturer, Drax, estimated that its facility, using comparable feedstocks and control technologies, would emit 49 tons of HAPs annually.

We also draw attention to one particular deficiency in PNWRE's listing of proposed control technologies. PNWRE failed to include controls for Volatile Organic Compounds in its four proposed hammermills. Comparison with currently operating mills suggests that uncontrolled wet hammermills at the PNWRE plant could emit up to 60 tons of VOCs and six tons of HAPs annually from this part of the production chain.

While noise pollution is not within ORCAA's specific remit, the impact of hammermills on the quality of life in Hoquiam should also be mentioned. Woody biomass delivered to the plant as slash or chips must be intensely pulverized to create the particle size needed for drying and processing. Drying creates emissions associated with the use of hog fuel, while processing through the use of hammermills creates a serious local noise hazard.

Hammermills routinely operate at 100db levels. PNWRE's proposal is for continuous operation of the plant. Hoquiam schools are less than one mile from the proposed facility, as is a major Pacific Flyway stopover area for migratory birds, the Grays Harbor National Wildlife Refuge.

Given the high likelihood that PNWRE's facility would meet the 'major source' threshold, **Pivot Point asks ORCAA to require PNWRE to submit a case-by-case Maximum Achievable Control Technology analysis.** We also seek a 'do-over' with respect to the Ambient Impact Review, which is based on inaccurate and inappropriate HAP emission rates.

We appreciate the opportunity to provide comments and look forward to continued engagement with ORCAA regarding this submission.

Respectfully submitted,



Peter Riggs, Executive Director  
Pivot Point, A Nonprofit Corporation  
Shelton, Washington