

January 16, 2024

To: Lauren Whybrew *by email*
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Olympic Region Clean Air Agency

RE: Formal comments on 23NOC1606 Preliminary Determination to Approve for Pacific Northwest Renewable Energy, LLC, 411 Moon Island Road, Hoquiam, Grays Harbor

Pacific Northwest Renewable Energy (PNWRE) is proposing a new wood pellet manufacturing facility in Hoquiam to produce about a half million tons of wood pellets annually for export and will operate close to 24 hours a day, every day.

This project should never have received a determination of non-significance under Washington SEPA rules and reached this point of permitting without more thorough consideration.

The amount of wood fiber required for production, plus that used for hog fuel and allowance for drying, were it grown and harvested sustainably, would require at least 100,000 acres of standing forest every year. (Hybrid poplar produces about 5 bone dry tons of fiber per acre.) As short as a 3-year rotation would require more than 300,000 acres. This amount of acreage would require at least a quarter of all the land in Grays Harbor County to be developed into industrial timberland solely for feedstock for this one wood pellet plant.

The wood pellets are proposed for export, not for domestic energy. The amount of energy in a half million tons of wood pellets is roughly equal to the energy in 1.207 million barrels of oil. At a time when Washington State has policy to pursue alternative energy for domestic use and local industries, including development of biomass into sustainable aviation fuel (SAF), approving PNWRE's project runs counter to State environmental and WA Department of Commerce goals.

PNWRE will be operating multiple hammermills around the clock and acknowledges they produce close to 100dB of noise. This amount of noise pollution is unmitigable and unacceptable in the surrounding area. PNWRE would be adjacent to Grays Harbor National Wildlife Refuge, and less than a half mile away from Hoquiam High School. 100dB is about the same level of noise as a train horn, but the noise from PNWRE would be constant.



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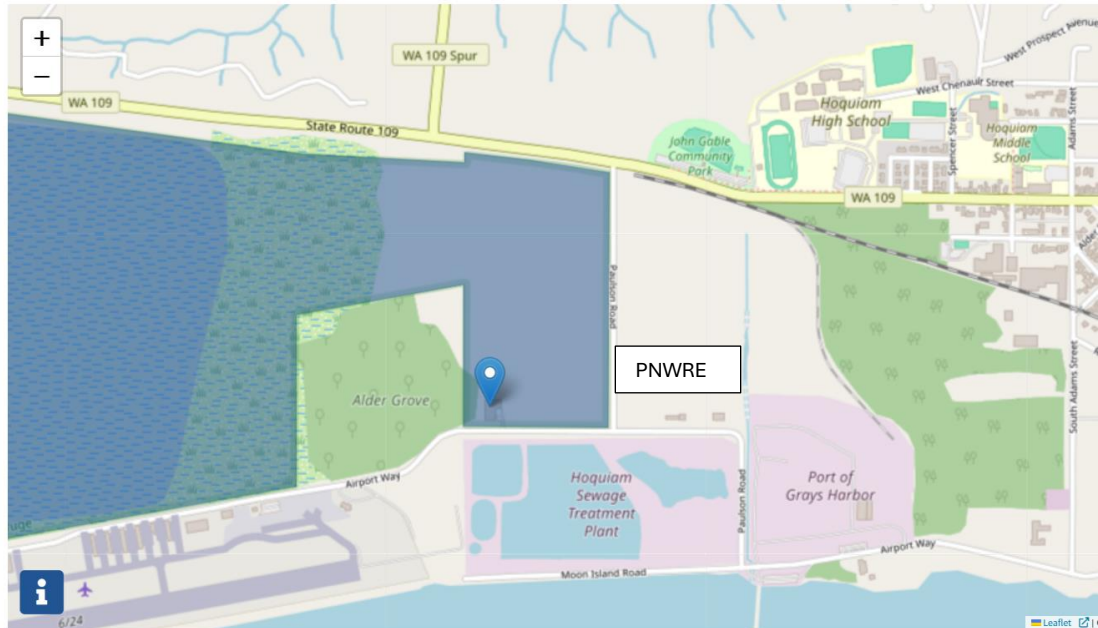
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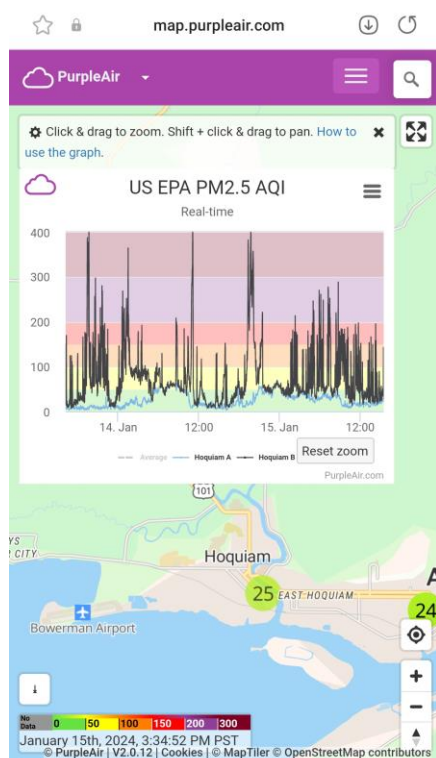
Also questionable is why development of the PNWRE site is not subject to Washington Shorelines Management Act considering it likely would operate within 200 feet of the high-water mark of Grays Harbor National Wildlife Refuge. And possibly be within the high-water mark in a couple decades.

Burning wood pellets for energy is not a step toward combatting climate change. According to the Partnership for Policy Integrity power plants that burn biomass emit 150 percent more carbon dioxide than those burning coal. Add on GHG's from operating industrial timberlands, production of pellets, and transport of feedstock and product. While some consider CO2 from biomass biogenic and thus carbon neutral, this cannot be the case unless there is a chain of accounting that every ton of carbon burned is also being actively pulled from the atmosphere in some manner. More forest would need to be grown than that just cut for wood fiber. One cannot promote growing more trees to combat global warming while at the same time cutting down more.

The PNWRE's impacts to air quality go beyond impacts from harvesting crucial forests, Earth's air cleansers. Producing wood pellets will add significant air pollution to the community surrounding the production facility.

Even without sufficient air quality monitors in Hoquiam for verification, “ambient air quality in Hoquiam and Aberdeen is assumed to be generally good.” p 4 *PNWRE Preliminary Determination to Approve* With prevailing westerlies and the only things to the west of the proposed project being the Grays Harbor National Wildlife Refuge and the Pacific Ocean, that assumption should be correct for the current vicinity of the project.

However, the westerlies will be blowing PNWRE’s air pollution to the east, to the population centers of Hoquiam and Aberdeen. The one regulatory monitor is in Aberdeen over a mile away and unlikely to directly pick up much of the wood pellet air pollution. There is a Purple Air particulate matter monitor closer, just off Route 101 near the Hoquiam Police Station. This monitor seems to register unhealthy levels of PM 2.5 regularly. See screenshot.



Major point source emissions in the area for 2021 (most current, updated Feb 2023) included COSMO Specialty Fibers- 2,829 tons total criteria air pollutants, also HAP major; Sierra Pacific Industries- 478 tons CAP; Paneltech- HAP major.

<https://ecology.wa.gov/air-climate/air-quality/air-quality-targets/air-emissions-inventory>

PNWRE will be adding significantly more polluting emissions to the area air shed. This includes more than 640 tons of criteria air pollutants, which compared to other similar wood pellet operations is likely underestimated.

Also of dubious credibility, the 1.32 tons of total HAP. Drax has submitted to Southwest Clean Air Agency, SWCAA, an air permit application for a similar new wood pellet production plant in Longview. Their total emissions for HAP are 48.9 tons.

SWCAA is not allowing abort process to bypass air pollution controls. **Why is ORCAA allowing bypass of air pollution controls?**

Why is ORCAA not including estimations of fugitive sources of emissions?

Item 13. Requirements for Major Stationary Sources and Major Modifications to Major Stationary Sources

It is stated the proposed pellet manufacturing facility is not a “major stationary source” as defined in 40 CFR 52.21 (b). **This is not true per federal EPA regulations and guidance.**

52.21 Prevention of significant deterioration of air quality.

b) **Definitions.** For the purposes of this section:

(1)

(i) **Major stationary source** means:

(a) Any of the following stationary sources of air pollutants which emits, or has the potential to emit, 100 tons per year or more of any regulated NSR pollutant: Fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants (with thermal dryers), primary copper smelters, municipal incinerators capable of charging more than 50 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, **fuel conversion plants**, sintering plants, secondary metal production plants, chemical process plants (which does not include ethanol production facilities that produce ethanol by natural fermentation included in NAICS codes 325193 or 312140), fossil-fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants, and charcoal production plants

Current federal EPA guidance can be found on their national website-

<https://www.epa.gov/nsr/guidance-definition-fuel-conversion-plants>

Guidance on the Definition of Fuel Conversion Plants

This document may be of assistance in applying the New Source Review (NSR) air permitting regulations including the Prevention of Significant Deterioration (PSD) requirements. This document is part of the NSR Policy and Guidance Database. Some documents in the database are a scanned or retyped version of a paper photocopy of the

original. Although we have taken considerable effort to quality assure the documents, some may contain typographical errors. Contact the office that issued the document if you need a copy of the original.

- [Guidance on the Definition of Fuel Conversion Plants \(pdf\)](#) (57.5 KB)

This document is part of the NSR Policy and Guidance Database.

“that generally occurs at other sources that EPA considers as “fuel conversion plants”(e.g., coal gasification, oil shale processing , conversion of municipal waste to fuel gas, processing of sawdust into pellets) under the PSD rules.” This quote is extracted from the referenced guidance document.

As noted under **4.4 Raw Material Processing**, raw materials for pellet production will consist of sawdust and shavings referred to as white wood.

PNWRE’s proposed wood pellet facility clearly fits the definition of a fuel conversion plant by EPA, will emit more than 100 tons per year of regulated pollutants (and probably closer to over 250 tons per year), and should be determined a major stationary source subject to prevention of significant deterioration permitting requirements.

Item14. Title V Air Operating Permit (AOP) Implications

As the facility will be a major source of NOx and CO subject to Title V of the federal Clean Air Act, why is PNWRE being allowed a year to apply for the Title V Air Operating Permit (AOP)?

Please send this project application back to the drawing board for more thorough review and consideration under SEPA and SMA. Require permitting under regulation for Prevention of Significant Deterioration per 40 CFR 52.21. Require regulation under MACT, not BACT. Require completion of application for Title V Air Operating Permit before commencing operations.

Thank you for your work to ensure clean air and a healthy environment for all residents.

Respectfully,

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