

Northwest Food Processors Association

RE: State of Washington Proposed Volkswagen Beneficiary Mitigation Plan

The Northwest Food Processors Association (NWFPA) submits the following comments on the proposed Mitigation Fund for Washington's portion of the VW Diesel Settlement. NWFPA is an association of 155 food and beverage processing companies in Washington, Oregon and Idaho with over 250 production facilities throughout the Northwest producing fruit and vegetable, seafood, dairy, poultry, bakery, specialty, and fresh-cut food products. Many companies are located in the state of Washington, and others deliver products to Washington or transport products through Washington.

NWFPA supports Ecology's focus on improving human health. Many food processors in Washington are located in urban areas in order to be close to skilled workforces and transportation routes. Our production facilities and employees are therefore exposed to diesel emissions and we support Ecology's effort to mitigate these harmful health effects.

We agree that replacing or repowering old diesel engines to lower emissions is a good use of the settlement money. Washington's food and beverage industry primarily uses diesel-powered on-road vehicles in their product transportation fleets. A recent survey of our association showed that 88% of respondents use Class 8 trucks and 83% use Class 1-7. This mitigation effort will result in significant reductions in NOx and PM, as explained on page 16 of the proposed Mitigation Plan. We support the percentages attributed to the Eligible Mitigation Action Categories in Table 2 which focus on areas with significant opportunity for emissions reductions, such as on-road heavy duty vehicles and marine vessels.

We recommend that Ecology set aside funds for the DERA Option for applicants that want to retrofit diesel vehicles instead of repowering or replacing, providing a cost-effective option for emission reductions. The cost effectiveness of a project must be an integral part of determining which projects receive funding. For some diesel vehicles, replacing the entire unit or repowering the engine may not be cost effective or possible. In some cases, an applicant may want to use best available control technology to determine the best course of action. The DERA Option allows for a variety of retrofits of verified exhaust control technologies for high-emitting categories. Furthermore, DERA allows for 100% funding limits, which is attractive for applicants.

Thank you for taking the time to read our comments. We look forward to helping our membership upgrade their diesel-powered fleets and improve air quality in Washington.

Sincerely,

Pamela Barrow
Vice President of Energy, Environmental & Sustainability

Submitted via Ecology Website

December 14, 2017

Brett Rude
Mike Boyer
P.O. Box 47600
Olympia, WA 98504-7600

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Sincerely,

A handwritten signature in cursive script that reads "Pam Barrow". The signature is written in black ink and is positioned below the word "Sincerely,".

Pamela Barrow
Vice President of Energy, Environmental & Sustainability