

Dear SEPA lead agency

Here are my questions regarding WestRock Pulp, paper and Power toxic air emissions increases:

-WestRock states that: "The new system will have belt conveyors with a dust collection cyclone specifically designed to control particulate matter emissions to replace two less efficient existing pneumatic chip conveying cyclones". Yet expected air pollution from both pm 2.5 and PM 10 shows and increase. How do you explain this contradiction?

-What are acceptable source impact levels? Why is ecology not doing a cumulative study of all sources in the port?

-What will happen to the materials remove with the new conveyor system?

-How are the additional 31,850 tons of chips brought to the facility and what are additional air pollution result from it?

-What are the chemicals used in the process? How are they delivered to the facility? How are they disposed of?

-Does WestRock have a toxics materials management and disposal plan?

-How will the additional 15.9 tons of various toxic chemicals react with other toxins in the air.

-How will they react with smoke from wildfires?

-How will they react with various port toxins during temperature inversions?

-How will the air toxins affect the water, the bay, the river and the land as they rain down?

-When will we learn how actual air emission compare to the estimations in the SEPA?

-Why are the pulp drying units not modified to deal with increased pulp and increased air pollution? What are best available control technologies and why are they not being applied?

-Increased air pollution is based on estimates. What happens when actual pollution is higher? What happens if pollution increases over time due to aging equipment/material failure?

-Tacoma has been under non-attainment for toxic air pollution. With air toxins increases from just about all other polluting port industry, what happens when non-attainment happens again?

-According to Washington State health study, indigenous women are several time more vulnerable to asthma compare to Caucasian males. How will ecology make sure sensitive populations are informed and warned?

-Will you reach out to preschools, schools & daycares and in the area to inform about toxic air pollution increases?

-Ecology states that toxic air pollutant emissions such as benzene, formaldehyde, acetaldehyde and tetrachloroethylene would be emitted greater than small quantities. Without cumulative air study, how can you claim these toxins not to be harmful to human health? They are all known endocrine disrupters and can cause cancer. What studies has Ecology done to make sure these toxins do not harm wildlife like amphibians who breathe with their skin?

-This SEPA is dealing with air emissions. Why is increased water use and water pollution not part of it?

Ecology's mission is to protect, preserve, and enhance Washington's land, air, and water for current and future generations. Over the last hundred years or so the Tacoma environment - particularly in the port - has become toxic beyond repair and we lost a large majority of aquatic life. We also know that Pierce County has worse health outcomes than all other counties in WA. Keeping this in mind, what is the reason Ecology is still not doing cumulative air assessments and why are there still no air monitoring devices in the port?

Best Regards

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