

Citizens for a Healthy Bay

My name's Erin Dilworth. I am the policy and technical program manager at Citizens for a Healthy Bay, or CHB. We have taken special care to review WestRock, formerly Simpson's, construction, cleanup, and air permitting activities for the last 28 years. There's not many other companies we scrutinize more, to ensure the biggest company in the Tideflats has stayed in compliance with applicable environmental regulations. They are a company that consistently follows the rules. Today's rules allow WestRock to burn more methane gas for internal operations, which simultaneously allows them to sell the extra electricity they generate from renewable fuels. Unfortunately these rules aren't keeping pace with advancing science that tells us that we need to take unprecedented actions in order to drastically cut our carbon emissions in the coming decades. So we have to ask our government and our industry to take leadership in slowing the pace of global warming. To that end, we request Ecology work with constituents in the legislature to update WAC 173-400 to analyze cumulative air emissions when considering new, modified, or updated permit actions. The WAC should also stipulate a protocol for analyzing upstream emissions, and leakage rates when considering air impacts. We also ask the Department of Ecology to compensate for the clear dated-ness of the current WAC by requiring WestRock to purchase or perform mitigation for any greenhouse gas emissions above their original 2007 steam limit permit.