

**From:** [Darlin' Boudreau](#)  
**To:** [Yamazaki, Shingo \(ECY\)](#)  
**Subject:** Please Deny WestRock Expansion Permit 4153  
**Date:** Thursday, December 20, 2018 8:48:38 AM

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Shingo Yamazaki,

Dear Ecology,

Please consider my comments regarding the WestRock Tacoma Steam Limit Project, Air Quality Notice of Construction Order No. 4153.

I heard about the hearing on December 17th in Tacoma and learned WestRock employees were testifying that this project was merely an “upgrade” to an old burner and this new model would only burn cleaner and would be used minimally to even out their electricity supply. If that is the case, then why do they need a permit to double their carbon dioxide emissions and increase a host of other dangerous compounds? It seems to me that it should allow them to decrease their emissions limits, based on what they said.

This, of course, makes me quite skeptical. I don't find it credible that a company would invest money into equipment that is capable of generating a given amount of energy but using it only for a fraction of that capability. If what I read in Business Wire and the Seattle Times is correct, then they are simply increasing their supply of natural-gas-generated electricity which will allow them to sell their “excess” biomass-generated electricity at a premium to California as “renewable”.

There are two problems with that. Firstly, the burning of fracked gas to enable an “excess” of biomass electricity inherently makes that biomass footprint even worse – an honest accounting would have to include the combustion emissions of the natural gas as well as the upstream emissions associated with its fracking and distribution. And methane leaks are very bad for the climate – the latest science reports say by as much as 96 times.

Secondly, there are serious scientific concerns as to the sustainability of using biomass. A 2010 study from the Manomet Center for Conservation Sciences says that biomass emits 45% more carbon dioxide than coal and almost 300% more than an efficient natural-gas power plant (only considering the point of combustion apparently).

For these reasons I am quite concerned about this expansion project in Tacoma – it will negatively impact our health and contribute to further climate destabilization.

Sincerely,

Darlin' Boudreau  
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33916 53rd Ave. S  
Auburn, Washington 98001

**From:** [Darlin' Boudreau](#)  
**To:** [Fritz, Angela \(ECY\)](#)  
**Subject:** Please Deny WestRock Expansion Permit 4153  
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Angie Fritz,

Dear Ecology,

Please consider my comments regarding the WestRock Tacoma Steam Limit Project, Air Quality Notice of Construction Order No. 4153.

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