

Scoping questions and comments for Washington Department of Ecology regarding the proposed Silicon Smelter near Newport, Wash.

Submitted October 26, 2018 by:

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Dear Mr. Pfeiffer:

I attended the Newport scoping hearing and spoke at the microphone, but with further study of the issue, I would like you to consider additional questions in your SEPA scoping process. They are listed below.

I have lived primarily in North Idaho for the past 39 years, but have also lived very briefly in Washington state. This proposal for a silicon smelter is the worst potential environmental and human health degradation project that we Idahoans living in Bonner County have faced since I've lived here. I am strongly opposed to the smelter being built anywhere near our beautiful and relatively pristine landscape and waterways.

- 1) As someone who suffers from asthma-like COPD, largely because of diminished air quality from July through September over the past three years, due to wildfire smoke, I would like to know how coal-burning pollutants and the toxic, microscopic particulates that will be emitted will be measured for human health? Especially for elderly adults like me and for children and during these smoky months? Will you shut down PacWest's operations? Right now, except for the impacts of wildfires and winter air inversions, our region enjoys relatively good air quality. Local doctors have gone on record to say this smelter would be dangerous to our health. How will DOE refute their medical expertise? What assurances will I have that my health will not worsen from this project?
- 2) It has been difficult for the City of Sandpoint to meet EPA air quality standards in recent years. They were out of compliance, but have finally achieved that status. What will coal transport through our town, and many more trucks passing through do to my town's air quality? There would have to be more testing, especially seasonally, for

particulates. We have only one air quality station at our county airport. There would need to be additional testing and monitoring. How is DOE planning to satisfy that need? Here is a copy from the EPA's website regarding Sandpoint: Sandpoint, Idaho was designated as a moderate PM-10 non-attainment area upon enactment of the Clean Air Act (CAA) Amendments of 1990. Idaho submitted an attainment plan to EPA on August 16, 1996, as a moderate PM10 State Implementation Plan (SIP) under section 189(a) of the CAA. The EPA approved the Sandpoint moderate PM10 SIP on June 26, 2002 ([67 FR 43006 \(PDF\)](#)(8 pp, 164 K,[About PDF](#))). On December 14, 2011, Idaho submitted a PM10 Limited Maintenance Plan and Redesignation Request. The December 14, 2011 SIP submittal included a request to approve revisions to the control measures included in the Sandpoint moderate PM10 SIP. On February 1, 2013, EPA proposed to approve in part and disapprove in part the Limited Maintenance Plan, and proposed to approve the redesignation request ([78 FR 7340 \(PDF\)](#)(8 pp, 266 K)). On April 3, 2013, EPA took final action to approve in part and disapprove in part the Sandpoint PM10 Limited Maintenance Plan and redesignate the Sandpoint area to attainment for PM10 ([78 FR 20001 \(PDF\)](#)(4 pp, 274 K)). In summary: The plan relies on control strategies needed to maintain attainment of the PM10 National Ambient Air Quality Standards (NAAQS). The strategy focuses on a comprehensive residential wood combustion program, controls on fugitive road dust and emission limitations on industrial sources. How would DOE address this, including summer wildfires and winter air stagnation primarily from wood stove smoke?

- 3) Sulfur Dioxide (SO₂) is unhealthy by most standards, and DOE needs to take into account that in addition to reduced air quality, it will also create acidified rain, fog and snow, conditions that are common here from October through April. Acidified water will go into our area's waterways. This is totally unacceptable. Lake Pend Oreille has a rather high pH now, but that could dramatically change with a coal-burning smelter. The impacts to fish, invertebrates and other aquatic species, as well as the wildlife, especially birds like loons and other piscivores, will need to be monitored. Who from the DOE will be doing that work in our state of Idaho? I wrote a book about Lake Pend Oreille and know all too well the historical and current uses of the lake as well as the Pend Oreille River. Human health impacts from acidification of air and water needs to be addressed, as well as aquatic species and wildlife.

There is a lot of research that has been done on acid rain in the eastern part of the U.S., and this area has not known such impacts before this current proposed threat. It would devastate our flora and fauna, and I would like to see the draft EIS address this possibility in detail. It would be a major impact to our tourism-based economy, and the clean air, clean water, and abundance of fish and wildlife is at the core of that economy. I am concerned about all of the above, but mostly for the non-human species who can't speak for themselves. How will you protect these non-human species who depend on clean air and water?

- 4) The Pend Oreille River near Priest River, Idaho has tested a relatively high pH, but what would acidic water, or coal ash laden with toxic metals do to the river or to the groundwater? My water is from a well. PacWest insists that there will be no pollution. I think that is impossible given smelter, coal-burning technology. What will DOE do to ensure our quality of life regarding clean air and clean water?
- 5) I strongly encourage that all of Bonner County, Idaho be within the scoping area. We are downwind from the proposed smelter. I would like to see the EPA involved under the National Environmental Policy Act. Projections of our air and water quality are not adequate as there are few sensors in place now. We need to have a baseline of at least one year of data before this project be considered, as PacWest's pollution predictions are totally inadequate. What will DOE do to supplement PacWest's inadequate data? We need a federal EIS that is more comprehensive than SEPA and takes our state, county and city into its focus. What assurance do we Idahoans have that the DOE will address our concerns?
- 6) How will DOE monitor the pollution impacts from heavy truck traffic and rail transportation through our town and county? Already we have dangerous rail traffic with the possibility of derailments of hazardous materials. How would the proposed smelter exacerbate that issue, and what will DOE do about it? Two forms of likely impact come quickly to mind: trucks carrying fuels for the smelter or output from it, and pollution. What preparation is needed to respond quickly and effectively to hazardous spills, either by train or truck transport, and who foots the bill? How many trains would be required to haul the 100,000 odd tons each of coal and quartz per year and what routes will the trains take? This needs to be taken into consideration in the

context of our current level of train traffic, 50-60 trains per day through Sandpoint, especially with the proposed second rail line from BNSF? More increased train and truck transportation will definitely impact in a negative way our overall quality of life.

- 7) I also want to know what assurances we in Idaho have to protect our soils, forests and plants from acidic pollution from the proposed smelter? Our forests are already stressed from Climate Change, and SO₂ pollution will only make this situation worse, leading to more forest fires from dying and dead trees. How will DOE address this issue? Besides our tourist-based economy, our traditional economy of logging and timber use would be threatened. How do you plan to assure that acid rain won't exacerbate the already thorny issue called Climate Change? I live surrounded by good soils and fairly healthy forests, but worry that this proposed smelter would alter that forever.
- 8) Lastly, I have worked for a nonprofit educational organization here in Idaho that collaborates on cross cultural projects with the Idaho Indian tribes, including the Kalispel Tribe of Indians, whose reservation is in Washington state, but whose aboriginal homeland also includes all of Bonner County. Our interest is particularly focused on how culture and the environment intersect. Traditional foods on the landscape and in the waters — camas, biscuitroot, water potatoes, wild carrots, wild potatoes, are still dug and gathered by tribal and non-tribal members. I gather serviceberries and huckleberries for my winter food. These traditional foods are essential not only for good health but are also food for wildlife and birds. What assurances will you give a 10,000 year old culture that their traditional foods will be there 10 years after a smelter begins polluting the air and water of their aboriginal homeland? I know that the Kalispel people are opposed to the silicon smelter proposal, and I join them in that opposition. You have no right to approve a project that will do irreparable harm to their Native culture.

Thank you for considering my comments and for addressing my questions in the draft environmental impact statement for the Washington Department of Ecology.

Sincerely,
Jane E. Fritz