



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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C.L. "Butch" Otter, Governor  
John H. Tippetts, Director

October 26, 2018

Grant Pfeifer, Regional Director  
Department of Ecology, Eastern Regional Office  
4601 N. Monroe St.  
Spokane, WA 99205

RE: PacWest Silicon Smelter, Newport WA – SEPA Scoping Public Comment Period

Dear Mr. Pfeifer:

Please accept these comments as you study and review the predicted environmental impacts of the proposed PacWest silicon smelter (smelter) in your State Environmental Policy Act (SEPA) review process. The state of Idaho Department of Environmental Quality (DEQ) is particularly interested in this project as it is charged with the protection of human health and the environment for the citizens of the state of Idaho.

Because the smelter is proposed for a location near the Washington and Idaho border, westerly winds, which are common in this location, will likely carry emissions from the smelter impacting air quality into Idaho. DEQ requests that Ecology evaluate areas within Idaho that may be potentially impacted by the smelter emissions during the SEPA process to ensure compliance with the federal Clean Air Act. DEQ air quality staff have appreciated being engaged with this project and request that the Washington Department of Ecology (Ecology) continue to work closely with DEQ.

DEQ understands the predicted emissions from the smelter will require a major source prevention of significant deterioration (PSD) air quality permit. Preconstruction air monitoring of certain pollutants will likely also be required by the PSD regulations, depending on the model predicted maximum impacts of such pollutants. DEQ requests decisions on any preconstruction monitoring are made publically available, including model input data and modeling files. In addition, note the US Forest Service (USFS) maintains a National Atmospheric Deposition monitoring station at the Priest River Experimental Forest northwest of Newport, site NTN ID02. The site has data from 2002 to present on parameters such as H<sup>+</sup> and SO<sub>4</sub> deposition as well as other anions and cations. Data is available at the following website <http://nadp.slh.wisc.edu/data/sites/siteDetails.aspx?net=NTN&id=ID02>.

DEQ also requests Ecology provide DEQ a copy of the (1) PacWest air quality permit application upon submittal and (2) draft air quality permit and supporting technical analysis at the start of the public comment period. DEQ intends to carefully review the draft air quality permit and may provide comments on the (1) selected best available control technology, (2) air quality impact analysis required to demonstrate compliance with applicable National Ambient Air Quality Standards (NAAQS) (i.e. SO<sub>2</sub>, CO, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>2</sub>, O<sub>3</sub>) and PSD increments (i.e. SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>2</sub>) within Idaho, (3) additional impact analysis of the impairment to Idaho's visibility, soils, vegetation, (4) predicted emissions that may impact air quality in the West Silver Valley PM<sub>2.5</sub> nonattainment area, (5) general commercial, residential, industrial and other air quality impacts associated with the source, and (6) air quality related values and impacts on Class I areas within Idaho (e.g. Hells Canyon, and Selway-Bitterroot Wilderness Area).

DEQ understands that PacWest has agreed to include in their air quality permit application a demonstration of compliance with Idaho's Toxic Air Pollutant (TAP) increments for any TAP impacting Idaho. For reference, compliance demonstration methods are described in the Rules for the Control of Air Pollution in Idaho at IDAPA 58.01.01.210. In addition, we request Ecology require PacWest to also include in their air quality permit application any potential impacts of mercury emissions to Idaho. Idaho's mercury rule for new or modified sources, located at IDAPA 58.01.01.215, requires sources with predicted mercury emissions of 25 pounds per year or greater to install mercury best available control technology (MBACT).

As you are aware, in recent years significant wildfire impacts have affected air quality in the west, particularly the northwest. All signs suggest these impacts will likely continue. We request Ecology consider these seasonal wildfire impacts and the effects the smelter emissions might contribute during smoke episodes. Is Ecology able to limit certain industrial operations when wildfire smoke impacts contribute to very high Air Quality Index (AQI) values and smelter operations could further deteriorate air quality during these episodes?

Additionally, eastern Washington and parts of north Idaho routinely experience meteorological conditions that contribute to extended periods of air stagnation. We request Ecology consider the impacts of the proposed smelter's emissions during these worse case meteorological scenarios. Like the wildfire impacts, is Ecology able to require limited operations during stagnation periods when the AQI values are in or predicted to reach unhealthy levels?

In regard to water quality, DEQ requests Ecology evaluate any potential impacts to Idaho's ground water. For example, at least two public drinking water systems, located in the Oldtown, Idaho area, have completed source water assessments; Solar Acres and River Terrace Mobile Homes. The source water assessments indicate the wells supplying these public water systems are potentially down gradient from the proposed site. If ground water was contaminated by the smelter activities, it could impact the ground water supplying drinking water to public water systems and domestic well owners in Idaho.

DEQ also requests Ecology work with the Idaho Department of Water Resources (IDWR) to evaluate the project's increased water demand on ground water levels and ground water flow direction especially if PacWest plans to develop a new production well near the Idaho/Washington border.

Lastly, in regard to solid and hazardous waste issues that may impact Idaho, DEQ requests Ecology evaluate the predicted waste products likely generated by the proposed smelter operations and determine if the waste products will characterize as hazardous wastes. Proper management and disposal options of any waste are important, but particularly DEQ is concerned with proper disposal of hazardous wastes. Please also assess any potential impacts to Bonner County's solid waste facilities.

In summary, we appreciate the opportunity to provide comments to this important process and have appreciated the coordinated efforts with DEQ to date. It is our understanding the Idaho Department of Fish and Game will also be providing comments and technical information regarding impacts to fish and wildlife habitat. We will look forward to working with them and other partnering state agencies as well as with Ecology on this project.

If you have questions about our comments or need further information, please contact Dan Redline, Regional Administrator, Coeur d'Alene Office at (208) 769-1422 or [daniel.redline@deq.idaho.gov](mailto:daniel.redline@deq.idaho.gov).

Sincerely,

A handwritten signature in blue ink that reads "Tippetts" with a stylized flourish at the end.

John H. Tippetts  
Director

c: Office of the Governor, Katrine Franks  
Idaho Department of Fish and Game, Chip Corsi  
Office of Energy and Mineral Resources, John Chatburn