

To: Washington Department of Ecology
Attention: Grant Piefer and Meg Bommarito
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Betty Gardner
1687 Robinson Drive
Priest River, ID 83856
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RE: Scoping Comments for EIS for proposed Silicon Smelter in Newport, WA

Please investigate business practices for PACWEST, HI Test or any other nomenclatures/names that this/these companies operate or have operated under in Canada or any other location in the world, including the quartz mine that they operate in Canada. Specifically, have they had any environmental law warnings, citations, violations, related legal interventions or prosecutions for environmental law infractions? If there is an equivalent of superfund cleanup designations in the countries where they operate or have operated please disclose this information. Have any government funded cleanups occurred at any of their sites? Have any of their companies been forced to do environmental cleanups by the governments where they operate after an investigation? This should include companies that members of their board of directors own, or sit on the boards of. Have they had to shut down production or been closed for any of these scenarios? Have they had health or safety violations at any of their facilities? Any work-related deaths at their factories or mines? I would like to know if they have been investigated and the outcomes including prosecutions, fines or exonerations. How long have they been in business? Where are they operating? This information should include interviews from people who work for them, have worked for them and/or live near their facilities. Are there Environmental Impact studies available from any of their facilities? Please include any and all that are available. Good reports would only help their cause so should be included. If there is no information available please indicate that there is no record available for any of these concerns. This information is absolutely necessary because by evaluating past business practices a reasonable forecast of how they might operate in the United States could be estimated. In turn, if they have no records indicating that they have had manufacturing experience with good evaluations why would we grant a totally inexperienced company use Newport, Washington and Western Idaho as their guinea pig? Both good and bad business practice reports should be part of your EIS.

DOE please demonstrate where the 320,000 tons of CO₂, 760 tons of SO₂, and 700 tons of Nitrogen Oxide that PACWEST admits it will create is most likely to land. To establish this please do studies at the proposed site not from Deer Park, Washington as was suggested at your scoping meetings. Please demonstrate in the EIS how much all other possible heavy metals will be emitted by the production process. This should include but not be limited to arsenic, lead and mercury. Your information should show the maximum amounts possible that could be emitted if the smelter is operating at full capacity with four smoke stacks and where the plume will land. Will this cloud really be spread over 200 square miles as has been suggested at all three of the scoping meetings the DOE just held?

DOE, please investigate how these pollutants will affect honey bees which are incredibly susceptible to arsenic, lead and mercury pollution which will be emitted by the coal burning which is part of the smelter production. Honey bees are already stressed with over 80% of all feral bees dying world-wide in the last 25 years and over 40% of all domestic bees dying in the last year. A question for DOE is: Will this poison from the smelter kill pollinating bees and other insects as they visit plants covered with heavy metals from smoke stacks? Will these heavy metals show up in local honey? Should honey with arsenic,

mercury and lead in it be consumed? Will this smelter put local honey producers out of business? Please indicate how these pollutants will affect organic gardens? Will trace elements of heavy metals be found in vegetables and fruits raised near the smelter? If so, will farmers' markets in the area have to list that local food may be contaminated by these heavy metals? At what point will an organic gardener not be allowed to say that they are organic if their garden is in the area under the pollution plume? Will this contribute to organic farmers going out of business or having to sell their produce as non-organic? Will animals that farmers raise under the plume have trace levels of heavy metals in their meat and eggs from ranging in grass or drinking water laced with heavy metals from the smelter?

I live on the Priest River, part of the Priest Salmo Priest Wilderness. Fish die at a PH of 5. How will the acid rain from the smelter affect soil PH and water PH of this area? How will the pollutants effect Priest Lake and the Priest River? Please model possible outcomes to the water quality of this area from pollutants from the smelter.

Finally, between 1992 and 2016, sixty-nine thousand three hundred and seventy-four or more workers were seriously injured by heat exposure at the job site with 783 dying. Smelters this proposed project has been compared to show working temperatures for employees at over 100 degrees Fahrenheit. What exactly is the ambient indoor work temperature that is anticipated inside this smelter? How will workers be protected from heat exposure and related illnesses to prolonged and continual high temperatures that they will be exposed to at their \$17.00 an hour job?

Sincerely,

Betty Gardner