

Donald Comins

To Whom it May Concern,

I'm asking you to address the following concerns and comments I have in the "EIS scoping" of the proposed PacWest smelter.

My wife and I retired and have lived in Pend Oreille County for the last 20 years. We moved here to enjoy the clean air, and relatively clean water of Pend Oreille County. We're not against all industry and would welcome light industry into our county to bring in jobs and to share in what we have. However, we don't want heavy Industry like the proposed smelter to come here from Canada and ruin our rural lifestyle and the reasons we moved here. We are adamantly opposed to the proposed PacWest smelter!

There are many problems associated with the construction and use of the proposed smelter. I'm very concerned over nitrogen oxide, sulfur dioxide and carbon emissions which WILL be produced as a result of this smelter burning fossil fuels. There may be others, but let's start with these. According to The Miner November 29, 2017 the Kalispel Tribe referred to the "Hi-Test PSD Modeling Protocol" revealing that "The smelter would generate 320,000 tons of greenhouse gases, 760 tons of sulfur dioxide, and 700 tons of nitrogen oxides each year." This is totally unacceptable!

I've lived in the mountains much of my life and terrain and weather have a lot to do with the dissolution of gaseous emissions. Emissions produced by smelters and fireplaces and burn piles impact air quality in mountain valleys. In Pend Oreille County, this is a particular problem during the winter months when we experience temperature inversions and fog in the valleys. These temperature inversions cause us to make "Air Quality Alerts" which discourage/prohibit burning in our fireplaces, or other outdoor burning, but yet we're considering building a smelter in a mountain valley which WILL produce dangerous sulfur dioxide and nitrogen oxide emissions 24/7 year around. That doesn't make any sense! According to Wikipedia, "Acid rain is caused by emissions of sulphur dioxide and nitrogen oxide, which react with the water molecules in the atmosphere to produce acids." During these periods of temperature inversions, the emissions, like the smoke from fireplaces, will mix with the fog and sink into valleys where it will stay until the weather turns. Furthermore, these gases, when combined with fog (moisture), will produce acid rain and have devastating effects on our health, lakes, streams, and forests. I've seen the effects of acid rain on the forests surrounding the Anaconda, MT copper smelter (now closed) not to mention what the smelter did to the water quality of the Clark Fork River.

Finally, if construction of the proposed smelter moves forward, the project MUST include, at a minimum, the latest technology to remove the two primary pollutants, sulfur dioxide and nitrogen oxide. This process is known as either the "SNOX process" or the "WSA process" (see attached) and is reported to be somewhat effective at removing these damaging pollutants. An advantage to this process is that the sulfuric acid, when removed and collected, can be sold. Furthermore, the coal, which is the primary contributor of these two pollutants, MUST be the cleanest available on the market, and be washed prior to it being used in the smelter.

Thank you for your consideration,

Donald J. Comins
20 Year Resident, Pend Oreille County

<https://www.topsoe.com/processes/sulfur-removal>

<https://www.revolvy.com/page/SNOX-process>