

Scot Adams

AIR DISCHARGES AND AIR PERMITTING AND MONITORING

The proposed smelter in Newport Washington is effectively in Idaho with respect to air emission impacts.

The Washington State air State Implementation Plans (SIPs) primarily place emphasis on the delegated Washington Department of Ecology authority for protecting Washington residents, not residents of other states.

Washington residents will be relatively unaffected, except for Newport. This is an extraordinary situation of cross state air pollution. This EIS scoping process is inherently unfair to residents, communities, and tribes in Idaho, because of the proposed location of the plant.

The Washington Department of Ecology, the Washington Department of Commerce, the Washington Air Implementation Plans (SIPs), and the Washington Governor do not politically represent the voters that will be impacted by the air permit and air emissions.

- A. The plant is located immediately against the state line with Idaho.
- B. The plant design drawing on the Ecology website has situated the effluent stack close to the state line, effectively resulting that 90-95 percent of air effluents will discharge into Idaho, leaving most Washington residents relatively unaffected by the smelter plume.
- C. The Washington Governor and Department of Commerce have placed schedule pressure on the Washington Department of Ecology for accelerating permitting.
- D. The EIS scoping meetings and outreach to the majority of impacted residents, communities, and tribes in Idaho may be inadequate. Ecology's emphasis has been on contact with Washington residents and communities.
 - 1.) Corrective Action- The air operating permit should be issued by the State of Idaho, rather than by the State of Washington, so as to protect those most environmentally impacted and to add accountability. The State of Idaho should apply to the US EPA to control air pollution from this border facility as a result of planned discharges to Idaho.
 - 2.) Corrective Action- The State of Idaho should determine what data needs to be collected, where, and when for background level baselines and for modeling of plant air releases into Idaho.
 - 3.) Corrective Action- The State of Idaho should determine monitoring requirements and locations for off-site air effluents in Idaho.
 - 4.) Corrective Action- The State of Idaho should determine protective measures and requirements for air effluents released to Idaho.
 - 5.) Corrective Action- The State of Idaho needs to consult with all of the Native American Nations within its state border to determine the interests and concerns of the tribes, as well as on-going monitoring needs to give peace of mind and representation. Emphasis is needed on A.) wood smoke issues related to heating, B.) environmental justice, and C.) treaty rights.

6.) Corrective Action- The applying company should fund representation by the State of Idaho for expenses and labor for planning protection of Idaho residents, from air discharges into Idaho.