

Yamazaki, Shingo (ECY)

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Sent: Tuesday, June 23, 2020 4:05 PM
To: Yamazaki, Shingo (ECY)
Subject: Public Comment, West Rock air permit 0000078

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This is Public Comment being made June 23, 2020, re the renewal of the West Rock air operating permit 0000078, Longview WA, Cowlitz County.

My family, neighbors, area residents, and myself have our health and lives directly affected by emissions from and activities at the West Rock facility. The community impact is strong and objectionable at times, and details of this air operating permit for a five-year period are of great importance to our health and quality of life.

To show the effect:

December 10, 2018, high concentrate NCGs emitted from the mill resulted in a horrendous sickening odor, 911 calls from residents, follow up by the Longview Fire Dept, and hospital employees wearing masks inside the hospital due to the very terrible stench.

Christmas Eve, 2017, emissions within legal limits but TRS emissions at one lime kiln maximum 32 parts per million; TRS emissions at another lime kiln maximum 10 ppm. An unpleasant, very sickening holiday.

7/05/2018, TRS levels around 30 ppm at lime kiln.
7/08/2018, TRS levels around 20 ppm at lime kiln.
7/17/2018, TRS levels around 30 ppm at lime kiln.
7/20/2018, TRS levels around 29 ppm at lime kiln.
7/26/2018, TRS levels 30 ppm at lime kiln.
8/23/2018: TRS daily maximum 31 ppm .
8/24/2018, TRS daily maximum 33 ppm.
9/25/2018: TRS maximum 19-35 ppm.
9/26/2018, TRS maximum 27-30 ppm.
On and on.

Sunday 9/16/2018, TRS coming from a stack at about 19 parts per million average for over five hours, legal but objectionable and unhealthy for residents.

9/20/2018, a strong putrid odor inside homes quite a long number of miles from the mill. Stench at my house also through the morning, several miles from the mill, and made me ill.

I believe the following changes should be made to this draft permit.

Change the word SHALL to MUST throughout the permit, to make limits and regulations exacting and clear. Ex on page 132, "limit SHALL not exceed". Pg 107, F1.2, "SHALL not exceed ten hours per month." Also on pages 103, 106, on permit deviations, and so forth.

LARGELY reduce the permitted level of TRS, F1.2, page 107 of permit, it states "SHALL not exceed 10 hours per month." Ten hours per month of high concentrate (strong) NCGs is extremely too much. Experiencing ten minutes of this is too much. Many acute health effects could result, as well as chronic health effects. This should be reduced to less than thirty minutes. And if not agreed upon with this, who would like to endure a lengthy high concentrate NCG emission? Also, ten hours is much higher than a percentage of operating time.

Very, very important, is to have allowable emission levels permitted and limited by the maximum ppm, NOT an AVERAGE ppm over a time period. Residents of Longview should be able to spend time outdoors without these terrible odors, and also not experience these stench inside homes, businesses, and the hospital. You can see by the above list that many emissions result in odors that easily could and do have resulting health effects. I strongly suggest TRS limits be reduced below 20 ppm.

Has the Permittee applied for and received a determination if Acid Rain regulations apply to this program? And have those documents been submitted to Ecology? Early this year there were many, many large whitish spots all over Longview, driveways and many areas, possibly from West Rock emissions. These are extremely hard to get rid of and it takes many hours of heavy duty pressure washing. This has happened often many prior years and West Rock may be a source?

FACILITY-WIDE GENERAL REQUIREMENTS

2). EMISSIONS DETRIMENTAL TO PERSONS OR PROPERTY. - West Rock provides valuable employment to this community, but there are also definite detrimental health effects, and also possible acid rain damage. This area is known for cancer and asthma rates, and other health symptoms do result.

6). FALLOUT - Does this include unhealthy particulate matter causing health issues, and also acid rain?

7). ODORS - These odors DO definitely interfere with persons using and enjoying their property. This includes inside homes, businesses, the hospital, and outdoor areas.

9). COMPLAINTS - This should be reworded to state "commence immediate corrective action, if warranted, without delay." The portion about "no later than three working days of receiving the complaint excluding holidays and weekends" should be deleted.

10). SULFUR DIOXIDE EMISSIONS - Are there any other emission units/sources besides the lime kilns and recovery furnace?

MONITORING, RECORD-KEEPING, and REPORTING

42) PERMIT DEVIATIONS - It states, "If the deviation presents a potential threat to human health or safety, the report SHALL be made as soon as possible but no later than TWELVE hours after the discovery of the deviation."

Is this the original notification to Ecology? If so, I believe it should be immediate, and the twelve hour timing way reduced. Or is this a follow up to the notification?

Thank you for your consideration of these points. The quality of life in this area is truly affected by these emissions and odors, and people do suffer with health and other issues as a result. I do and I know of others.

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Sent from my iPad