November 8, 2022

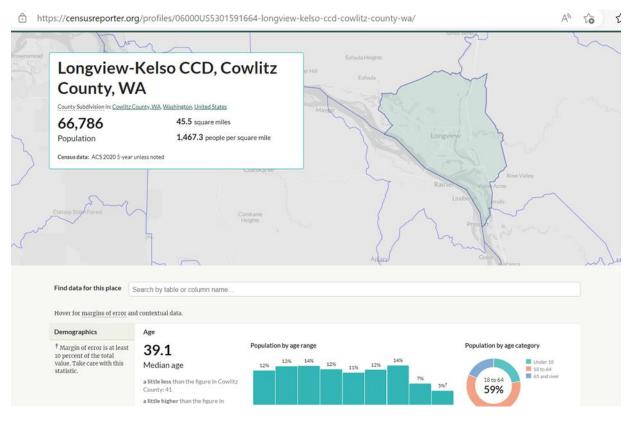
To: Washington Department of Ecology

# Identifying Overburdened Communities Highly Impacted by Air Pollution

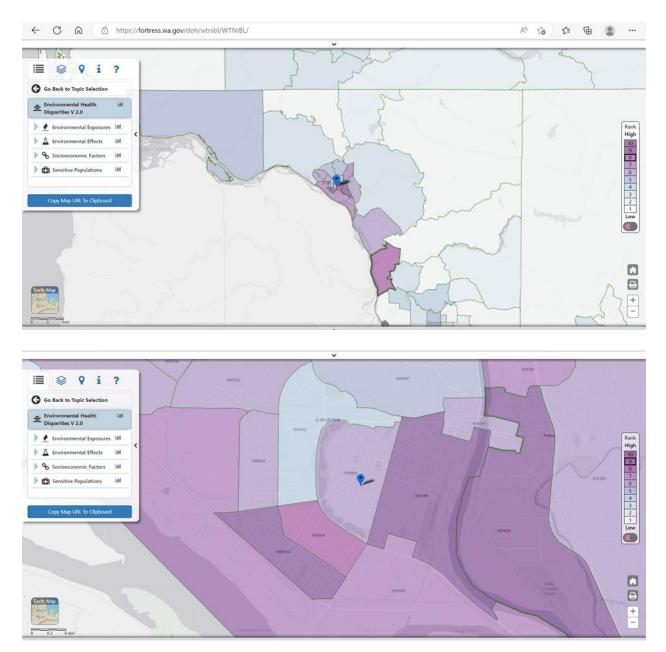
Formal Comments- Diane L. Dick, 13 Saint Helens Lane, Longview, WA 98632 DICKDL50@gmail.com

The Longview-Kelso community should be designated an overburdened community from air pollution. With only one regulatory PM 2.5 monitor at sea level, the community should receive additional continuous regulatory monitors dispersed in multiple areas and elevations, and with additional chemical sensors. The county, and some census tracts more significantly, have below average income levels and high-risk health disparities. There are industrial sources with high levels of toxic emissions within a relatively confined geographic area adjacent to disadvantaged neighborhoods.

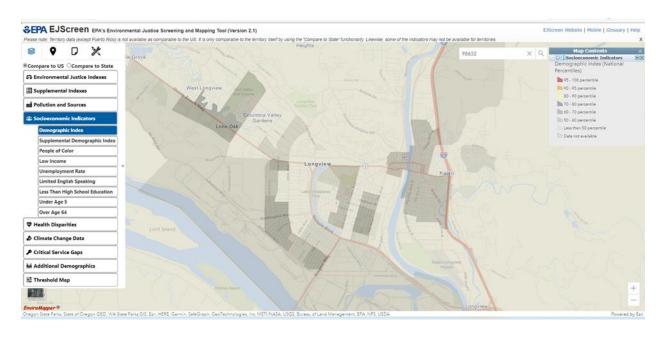
Longview and Kelso comprise 24 square miles within Cowlitz County's 1,140 square miles and contain 50,543 of the county's 111,524 residents. An alternate county subdivision is the Longview-Kelso CCD. The community lies in a river valley at the confluence of the Columbia, Cowlitz, and Coweeman Rivers. The close in surrounding hills rise to over 500 feet in elevation. Across the Columbia River sits the Oregon community of Rainier. Longview-Kelso contains the major shipping Port of Longview and the Southwest Regional Airport. The community is astride the major transportation routes of the Interstate 5 Highway and the BNSF main north-south rail line. Multiple gas and petroleum distribution and transmission lines traverse the county.

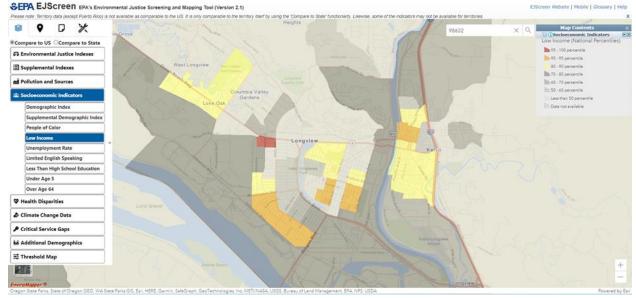


Meeting the community indicator for an overburdened community, on the Washington Environmental Health Disparities (EHD) map, several census tracts in the Longview-Kelso community have a 9 ranking for environmental health disparities.



While the overall EJ Demographic Index does not exceed the 90th percentile, some census tracts do exceed it for the contributing low-income factor.





Washington Department of Ecology then requires indicators of air pollution by elevated levels of criteria air pollution derived from Table 2. Criteria Pollutant Thresholds of the Technical Support document Publication 22-02-044. The probability of a general community member to determine such pollutant thresholds as described in the table for their community is likely close to zero.

As previously noted, the Longview area has one monitor sensing only PM 2.5. The last actual ambient air monitoring occurred more than ten years ago. The monitoring reports noted concerns about need for more investigations and inconsistencies in wind directions between reporting sites. There are the additional variables from elevated topographies and confined air inversions in a river valley. There are seasonal shifts in wind direction and daily shifts associated with wind movement in the Columbia River valley.

Another air pollution indicator is "emissions over distance from stationary sources." While Ecology explains their method, they do not supply the results for community use. I also question why ammonia, NH<sub>3</sub>, is not included as a criteria air pollutant, as EPA does.

The map below with 3 mile radius indicates stationary industrial sources of significant CAPs. Most of the schools in the Longview and Kelso School Districts lie within this radius. All the stationary industrial sources are within a 3 mile or less radius of previously noted census tracts.





The following data is from EPA 2017 NEI, which shows emissions in the 3 mile Longview-Kelso radius compared to other areas and emitters in the state.

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© Copy (	STATE FIPS T	© Print D J	COUNTY	1. FACILITY 1.	ADDRESS 11	CITY 11	ZIP CODE 1	POLLUTANT 1	POLLUTANT TI	EMISSIONS (r 1	UNIT OF 11 MEASURE 11	FACILITY 11	NAICS 11	VAICS DESCRIPTION 11
4	53	Whatcom	53073	Alcox Primary Metals intaloo Works	4050 Mountain View Rd	Ferndale	98248-0937	PM2.5 Primary (Filt + Cond)	CAP	597.05041	TON	Primary Aluminum Plant	331313	
A	51	Grays Harbor	\$3027	COSMO Specialt Fibers, Inc.	y 1701 First St	Cosmopolis	98537	PM2.5 Primary (Filt = Cond)	CAP	280.06	TON	Pulp and Paper Plant	322130	PAPERBOARD MILLS
60	5	Pierce	\$3053	WestRock Tacor Mill	ne 801 E Portland Ave	Тасота	99421	PM2.5 Primary (Filt + Cond)	CAP	217.9428946	TON	Pulp and Paper Plant	3221	PULP, PAPER, AND PAPERBOARD MILLS
0	53	Lewis	53041	TransAlta Centralia Generation, LLC	913 Big Hanaford Road	Certralia	98531	PM2.5 Primary (Filt = Cond)	CAP	299.01	TON	Electricity Generation via Combustion	221112	FOSSIL FUEL ELECTRIC POWER GENERATION
6	53	Cowlitz	53015	Westfoodk Longview,LLC	300 Fibre Way	Longolew :	99632	PM2.5 Primary (Filt + Cond)	CAP	191.862104	TON	Pulp and Paper Plant	322130	PAPERBOARD MILLS
Ni	53	Skagit	53057	SHELL PUGET SOUND REFINER	8505 SOUTH TEXAS ROAD	Anacortes	98221-9340	PR2.5 Primary (Filt + Cond)	CAP	182.02	TON	Petroleum Refinery	334110	PETROLEUM REFINERES
	53	Skagt	53057	TESORO NORTHWEST COMPANY	10200 W MARCH POINT RD	Anacortes	94221-8642	PM2.5 Primary (Filt = Cond)	CAP	141.44	TON	Petroloum Refinery	324110	PETROLEUM REFINERIES.

# **PM 2.5** WestRock Longview, 5<sup>th</sup> highest emitter in the state

## **SO2**- Nippon Dynawave and WestRock Longview, 5<sup>th</sup> and 10<sup>th</sup> highest emitters

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ATE 11	STATE FIPS 11	COUNTY 11	COUNTY FIPS 1	↓ FACILITY ↑↓	ADDRESS 11	CITY 11	ZIP CODE 11	POLLUTANT 1	POLLUTANT TI	EMISSIONS # 1	UNIT OF 11 MEASURE 11	FACILITY TYPE 11	NAICS CODE 11	NAICS DESCRIPTION
	53	Whatcom	53073	Alcoa Primary Metals Intalco Works	4050 Mountain View Rd	Ferndale	98248-0937	Sulfur Dioxide	CAP	3987.336	TON	Primary Aluminum Plant	331313	
	53	Lewis	53041	TransAlta Centralia Generation, LLC	913 Big Hanaford Road	Centralia	98531	Sulfur Dioxide	CAP	1689.62	TON	Electricity Generation via Combustion	221112	FOSSIL FUEL ELECTRIC POWER GENERATION.
	53	Walla Walla	53071	Packaging Corporation of America	31831 W Hwy 12	Wallula	99363	Sulfur Dioxide	CAP	885.41	TON	Pulp and Paper Plant	322130	PAPERBOARD MILLS.
	53	Whatcom	53073	BP CHERRY POINT REFINERY	4519 GRANDVIEW RD	Blaine	98230-9640	Sulfur Dioxide	CAP	808	TON	Petroleum Refinery	324110	PETROLEUM REFINERIES.
	53	Cowlitz	53015	Nippon Dynawave Packaging Co.	3401 Industrial Way	Longview	98632	Sulfur Dioxide	САР	390.21	TON	Pulp and Paper Plant	322110	PULP MILLS.
	53	King	53033	Seattle-Tacoma intl	Unknown	Seattle	00000	Sulfur Dioxide	CAP	271.0554205861	TON	Airport	48811	AIRPORT
	53	Grays Harbor	53027	COSMO Specialty Fibers, Inc.	1701 First St	Cosmopolis	98537	Sulfur Dioxide	CAP	242	TON	Pulp and Paper Plant	322130	PAPERBOARD MILLS.
	53	Skagit	53057	SHELL PUGET SOUND REFINERY	8505 SOUTH TEXAS ROAD	Anacortes	98221-9340	Sulfur Dioxide	CAP	225.24	TON	Petroleum Refinery	324110	PETROLEUM REFINERIES.
	53	Skagit	53057	CHEMTRADE	8579 N TEXAS RD	Anacortes	98221-8603	Sulfur Dioxide	CAP	203.43	TON	Chemical Plant	325180	
	53	Cowlitz	53015	WestRock Longview, LLC	300 Fibre Way	Longview	98632	Sulfur Dioxide	CAP	197.98	TON	Pulp and Paper Plant	322130	PAPERBOARD MILLS.

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Λ	53	Whytcom	53073	Alcoa Primary Metals Intalco Works	4050 Mountain View Rd	Ferndale	98248-0937	Carbon Monoxide	CAP	31382.42	TON	Pointary Aluminum Plant	331313	
	53	King	53033	Seattle-Tacoma Intil	Unknown	Seattle	00000	Carbon Monoxide	CAP	4273,68077262	TON	Arport	48811	AIRPORT OPERATIONS
·	53	Cowlitz	53015	Nippon Dynawave Packaging Co	3401 Industrial Way	Longview	99632	Carbon Monoxide	CUP	2308.52	TON	Pulp and Paper Plant	322110	PULP MILLS.
	53	Pierce	53053	WestRock Tacoma Mill	801 E Portland Ave	Тасопа	96421	Carbon Monoxide	CAP	1598.33	TON	Pulp and Paper Plant	3221	PULP, PAPER, AND PAPERBOARD MILLS
	4.0	Lewis	53041	TransAlta Centralia Generation, LUC	313 Big Hanaford Road	Centralia	98531	Carbon Monoxide	CAP	1303.49	TON	Electricity Generation via Combustion	221112	FOSSIC FUEL ELECTRIC POWER GENERATION.
	53													

# **CO**- Nippon Dynawave, 3<sup>rd</sup> highest emitter

NO<sub>x</sub>- Nippon Dynawave and WestRock Longview, 4<sup>th</sup> and 9<sup>th</sup> highest emitters

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	53	Lewis	53041	TransAlta Centralia Generation, LLC	913 Big Hanaford Road	Centralia	98531	Nitrogen Oxides	CAP	6214.37	TON	Electricity Generation via Combustion	221112	FOSSIL FUEL ELECTRIC POWER GENERATION.
	53	King	53033	Seattle-Tacoma Intl	Unknown	Seattle	00000	Nitrogen Oxides	CAP	2040.185884764	TON	Airport	45811	AIRPORT OPERATIONS
	53	Skagit	53057	TESORO NORTHWEST COMPANY	10200 W MARCH POINT RD	Anacortes	98221-8662	Nitrogen Oxides	CAP	1970.78	TON	Petroleum Refinery	324110	PETROLEUM REFINERIES.
	53	Cowlitz	53015	Nippon Dynawave Packaging Co.	3401 Industrial Way	Longview	98632	Nitrogen Oxides	COP	1949.43	TON	Pulp and Paper Plant	322110	PULP MILLS.
	53	Whatcom	53073	BP CHERRY POINT REFINERY	4519 GRANDVIEW RD	Blaine	98230-9640	Nitrogen Oxides	CAP	1918	TON	Petroleum Refinery	324110	PETROLEUM REFINERIES.
	53	King	53033	Ash Grove Cement Company	3801 E Marginal Way S	Seattle	98134-1113	Nitrogen Oxides	CAP	1367.889	TON	Portland Cement Manufacturing	327310	CEMENT MANUFACTURING.
	53	Pierce	53053	WestRock Tacoma Mill	801 E Portland Ave	Tacoma	98421	Nitrogen Oxides	CAP	1120.9	TON	Pulp and Paper Plant	3221	PULP, PAPER, AND PAPERBOARD MILLS
	53	Skagit	53057	SHELL PUGET SOUND REFINERY	8505 SOUTH TEXAS ROAD	Anacortes	98221-9340	Nitrogen Oxides	CAP	1053.68	TON	Petroleum Refinery	324110	PETROLEUM REFINERIES.
	53	Cowlitz	53015	WestRock Longview, LLC			98632	Nitrogen Oxides	CUP	1040.95	TON	Pulp and Paper Plant	322130	PAPERBOARD MILLS.
	53	Lewis	53041	Cardinal FG Winlock	545 Avery Road West	Winlock	98596	Nitrogen Oxides	CAP	809.14	TON	Glass Plant	327211	FLAT GLASS MANUFACTURING.

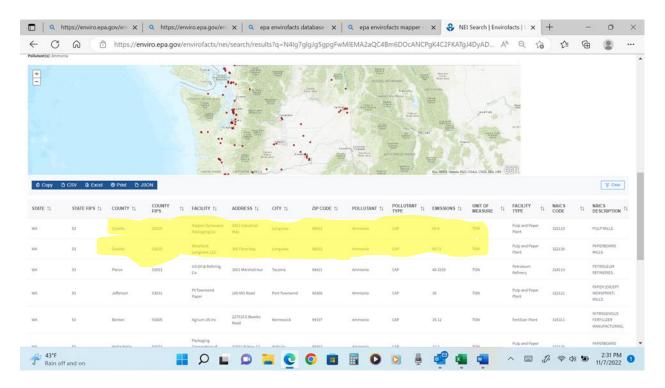
# **VOCS**- NORPAC, 9<sup>th</sup> highest emitter

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TATE 11	STATE FIPS 11		COUNTY FIPS 1	I FACILITY 1	ADDRESS 11		ZIP CODE 11	POLLUTANT 1	POLLUTANT 11	EMISSIONS 1	UNIT OF 11 MEASURE 11	FACILITY TYPE 11	NAICS T	NAICS DESCRIPTION TI
	53	Whatcom	53073	PHILIPS66 Femdale Refinery	3901 UNICK RD	Ferndale	98248 9003	Volatile Organic Compounds	CAP	972	TON	Petrolipum Refinery	324110	PETROLEUM REFINERES.
c.	53	Skagt	53057	TESORO NORTHWEST COMPANY	10200 W MARCH POINT RD	Anacortes	98221-8862	Volatile Organic Compounds	CAP.	863.49	TON	Petroleum Refinery	324110	PETROLEUM REFINERIES.
	53	King	53013	Seattle Tacoma intl	Unknown	Seattle	00000	Volatile Organic Compounds	CAP	651.4451637815	TON	Airport	48811	AIRPORT OPERATIONS
	53	Snohomish	53061	Boeing Convinential Airplane Group - Evenett	3003 W Casino Rd	Everett	98204	Voiatile Organic Compounds	CAP	437.888	TON	Arcraft, Aerospace, or Related Parts Plant	336411	AIRCEANT MANUFACTURING.
	53	Skagit	53057	SHELL PUGET SOUND REFINERY	IISOS SOUTH TEXAS ROAD	Anacortes	98221-9340	Volatile Organic Compounds	CAP	429.13	TON	Petroleum Refinery	324110	PETROLEUM REFINERES
	53	Yakima	53077	Novolex Shields, LLC	1009 Rock Avenue	Yakima	98962	Volatile Organic Compounds	CAP	129	TON		326112	PLASTICS PACKAGING FILM AND SHEET (INCLUDING LAMINATED) MANUFACTURING.
	53	Whatcom	\$3073	BP CHERRY POINT REFINERY	4519 GRANDVIEW RD	Blaine	98230-9640	Volatile Organic Compounds	CAP	322	TON	Petroleum Refinery	324110	PETROLEUM REFINERES
	53	King	53033	Boeing Commercial Airplane Renton	737 Logan Ave N Bidg 4-68 (Sth & Logan)	Rentan	99055	Volatile Organic Compounds	CAP	256.714	TON		336411	AIICRAFT MANUFACTURING.
	53	Coulitz	53015	North Pacific Paper Company	3001 Industrial Way	Longview	99632	Votable Organic Compounds	CAP	242.4	TON	Pulp and Paper Plant	322122	NEWSPRINT MILLS

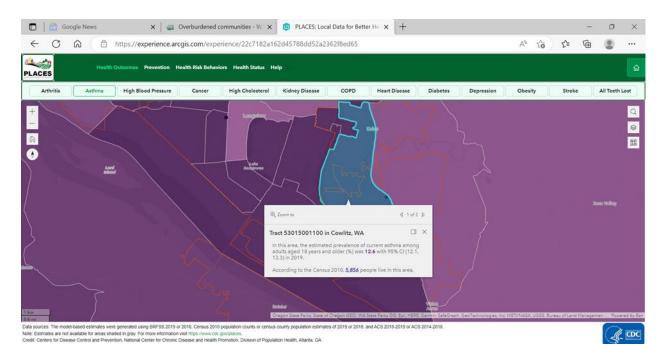
**Pb**- While no single stationary sources in Longview-Kelso ranked high in state for lead emissions, the Southwest Regional Airport in Kelso emitted 220 pounds of lead per 2017 NEI. Airport operations have picked up since then. Next highest was Nippon Dynawave with 74. 4 pounds.

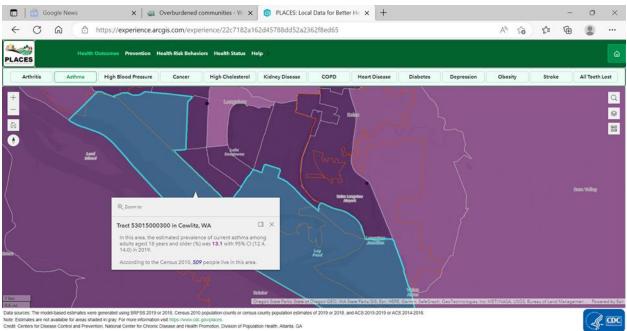
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STATE ↑↓	STATE FIPS 1	COUNTY 11	COUNTY FIPS 11	FACILITY 1	ADDRESS 1	CITY 11	ZIP CODE 1	POLLUTANT 1	POLLUTANT 11 TYPE	EMISSIONS (r 1	UNIT OF 11 MEASURE 11	FACILITY TYPE 11	NAICS CODE 11	NAICS DESCRIPTION 11
MA	53	Kittitas	53037	Bowers Field	Unknown	Ellensburg	00000	Lead	CAP) HAP	284.0987912	LB	Airport	48811	AIRPORT OPERATIONS
NA	53	Clallam	53009	William R Fairchild Int	Unknown	Port Angeles	00000	Lead	CAP) HAP	283.712632	LB	Airport	48811	AIRPORT OPERATIONS
NA	53	Whatcom	53073	BP CHERRY POINT REFINERY	4519 GRANDVIEW RD	Blaine	98230-9640	Lead	CAP) HAP	275	LB	Petroleum Refinery	324110	PETROLEUM REFINERIES.
IA	53	Grant	53025	Grant County Inti	Unknown	Moses Lake	00000	Lead	CAP) HAP	271.479236	LB	Airport	48811	AIRPORT OPERATIONS
IA	53	Lewis	53041	Chehalis-Centralia	Unknown	Chehalis	00000	Lead	CAP/HAP	250.98431	LB	Airport	48811	AIRPORT OPERATIONS
IA	53	Whatcom	53073	Bellingham Intl	Unknown	Bellingham	00000	Lead	CAP/HAP	234.559714	LB	Airport	48811	AIRPORT OPERATIONS
IA	53	Cowlitz	53015	Kelso-Longview	Unknown	Kelso	00000	Lead	САРуНАР	219.58491	LB	Airport	45811	AIRPORT OPERATIONS
uA.	53	Whatcom	53073	Alcoa Primary Metals intalco Works	4050 Mountain View Rd	Ferndale	98248-0937	Lead	САР/НАР	210.2	LB	Primary Aluminum Plant	331313	
IA	53	Spokane	53063	Deer Park	Unknown	Deer Park	00000	Lead	CAP)HAP	204.9348	LB	Airport	48811	AIRPORT OPERATIONS
IA	53	Douglas	53017	Pangborn Memorial	Unknown	Wenatchee	00000	Lead	CAP)HAP	199.191066	LB	Airport	48811	AIRPORT OPERATIONS
						Showing 21 to 30 of	658 < 1 2	3 4 5 →						

**NH3**- As EPA considers ammonia a CAP, this pollutant bears noting. Nippon Dynawave and WestRock Longview are the two highest emitters in the state. As noted further on, across the Columbia River at Deer Island, Oregon, about 15 miles upstream from Longview-Kelso, Dyno Noble released over 6 million pounds, or 3000 tons, of ammonia on-site to the air.

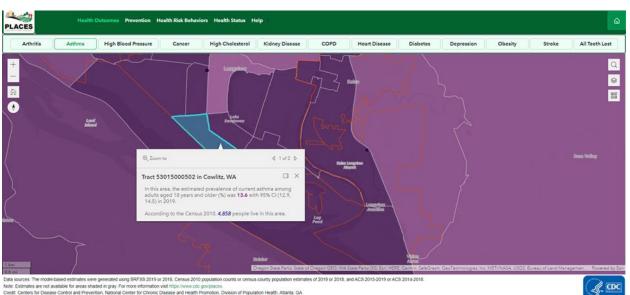


Below is data for Longview-Kelso census tracts for asthma and COPD from PLACES: Local Data for Better Health showing rates higher than the national average.



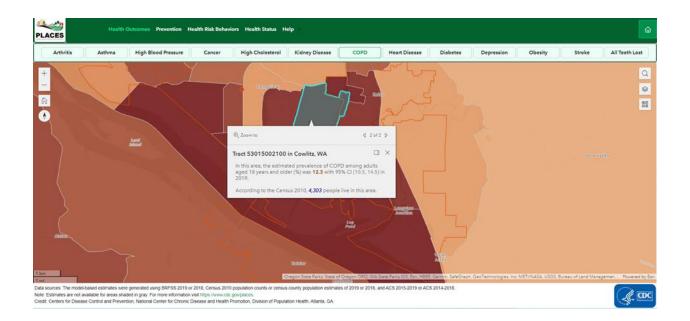


tion, Division of Population Health, Atlanta, GA

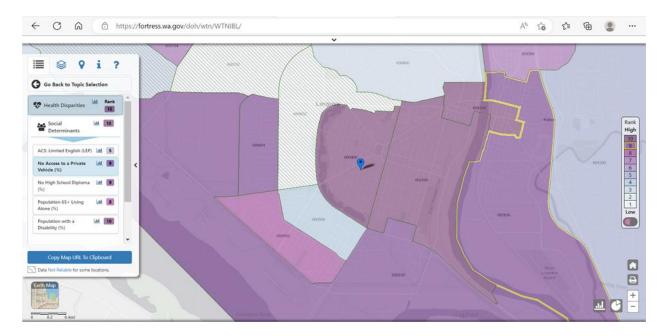


sources. The model-based estimates were generated using BRFSS 2019 or 2018. Census 2010 population counts or Estimates are not available for areas shaded in gray. For more information wait https://www.cdc.gov/places. It. Centers for Decese Control and Prevention. National Center for Chronic Disease and Hearth Priomoton, Division of

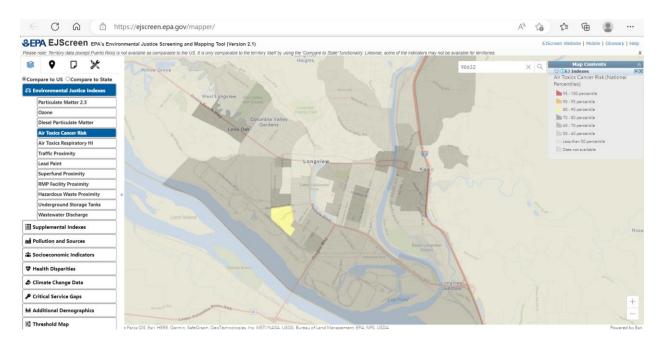
at https://www.coc.gov/paces. ease and Health Promotion, Division of Population Health, Atlanta, GA



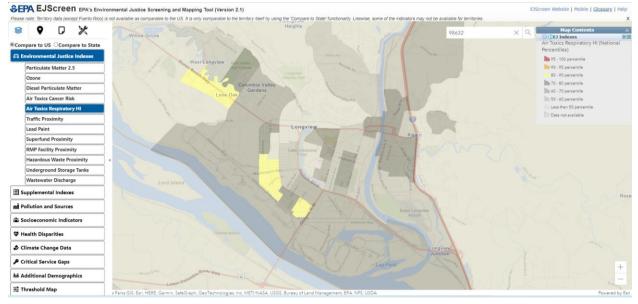
### Households with no access to private vehicle-

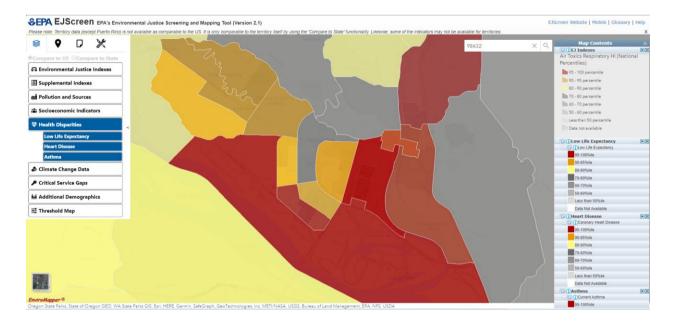


According to the EPA environmental justice mapping tool, almost all of Longview-Kelso is above the 50th percentile for air toxics cancer risk, with neighborhoods closest to industry sites and transportation corridors reaching the 70<sup>th</sup> to 90<sup>th</sup> percentiles.



#### The Respiratory Hazard Index is even worse.





Add in the health disparities and the outlook is bleak.

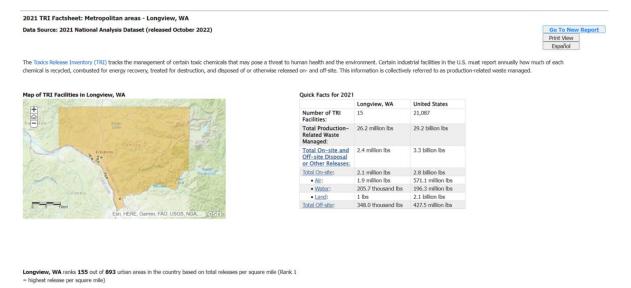
According to the EPA Toxics Release Inventory, of the 315 TRI facilities in Washington reporting to the EPA, 15 of the facilities are within Cowlitz County.

The 15 facilities in Cowlitz County released 1.9 million pounds of toxic chemicals into the air in 2021. These 1.9 million pounds are out of the 6.1 million pounds of air releases for the entire state. Almost a third of all toxic on-site air releases in Washington are coming from Cowlitz County, as reported to EPA.

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e here: EPA Home * TRI * TRI Explorer * 2021 TRI Factsheet: County – Cowlitz, WA				
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ource: 2021 National Analysis Dataset (released October 2022)				
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dcs Release Inventory (TRI) tracks the management of certain toxic chemicals that may p al is recycled, combusted for energy recovery, treated for destruction, and disposed of or TRI Facilities in Cowlitz County, WA	otherwise released on- and off-site. This information is Quick Facts for 2021	couliectively referred to as producti	United States	Español
I is recycled, combusted for energy recovery, treated for destruction, and disposed of or	otherwise released on- and off-site. This information is Quick Facts for 2021 Number of TRI Facilities:	Cowlitz County, WA	United States 21,087	Español
I is recycled, combusted for energy recovery, treated for destruction, and disposed of or	otherwise released on- and off-site. This information is Quick Facts for 2021	couliectively referred to as producti	United States	Español
I is recycled, combusted for energy recovery, treated for destruction, and disposed of or	otherwise released on- and off-site. This information is Quick Facts for 2021 Number of TRI Facilities: Total Production-Related	Cowlitz County, WA	United States 21,087	Español
I is recycled, combusted for energy recovery, treated for destruction, and disposed of or TRI Facilities in Cowlitz County, WA Company of the second secon	otherwise released on- and off-site. This information is Quick Facts for 2021 Number of TRI Facilities: Total Production-Related Waste Managed: Total On-site and Off-site	Cowlitz County, WA 15 26.2 million lbs	United States 21,087 29.2 billion lbs	Español
Is recycled, combusted for energy recovery, treated for destruction, and disposed of or TRI Facilities in Cowlitz County, WA Const Alona	otherwise released on- and off-site. This information is Quick Facts for 2021 Number of TRI Facilities: Total Production-Related Waste Managed: Total On-site and Off-site Disposal or Other Releases:	Cowlitz County, WA           15           26.2 million lbs           2.4 million lbs	United States 21,087 29.2 billion lbs 3.3 billion lbs	Español
Is recycled, combusted for energy recovery, treated for destruction, and disposed of or TRI Facilities in Cowlitz County, WA Const Alona	otherwise released on- and off-site. This information is Quick Facts for 2021 Number of TRI Facilities: Total Production-Related Waste Managed: Total On-site and Off-site Disposal or Other Releases: Total On-site:	Cowlitz County, WA       15       26.2 million lbs       2.4 million lbs       2.1 million lbs	United States 21,087 29.2 billon lbs 3,3 billion lbs 2.8 billion lbs	Español
I is recycled, combusted for energy recovery, treated for destruction, and disposed of or TRI Facilities in Cowlitz County, WA Compared to the second seco	otherwise released on- and off-site. This information is Quick Facts for 2021 Number of TRI Facilities: Total Production-Related Waste Managed: Total On-site and Off-site Disposal or Other Releases: Total On-site: • Air:	Cowitz County, WA         15         26.2 million lbs         2.4 million lbs         2.1 million lbs         1.9 million lbs	United States 21,087 29.2 billon lbs 3.3 billion lbs 28.8 billion lbs 571.1 million lbs	Español

#### TRI Explorer Contact Us You are here: EPA Home " TRI " TRI Explorer " 2021 TRI Factsheet: State - Washington 2021 TRI Factsheet: State - Washington Data Source: 2021 National Analysis Dataset (released October 2022) o To New Report Print View Español Classic View The Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. This information is collectively referred to as production-related waste m Map of TRI Facilities in Washington Ouick Facts for 2021 United States Washington Ŧ Number of TRI Facilities: 315 21.087 31 Total Production-Related 185.0 million lbs 29.2 billion lbs Waste Managed: 0 23 Total On-site and Off-site 20.9 million lbs 3.3 billion lbs 0 osal or Other Rele 63 Total On-site: 12.6 million lbs 2.8 billion lbs • Air: 6.1 million lbs 571.1 million lbs Water 4.7 million lbs 196.3 million lbs · Land: 1.6 million lbs 2.1 billion lbs Total Off-Site 8.2 million lbs 427.5 million lbs Washington ranks 39 out of 56 states/territories n ide based on tota es per square mile (Rank 1 = highest releases)

TRI mapping shows all 15 facilities in the Longview metropolitan area, ranking this area 155 out of 893 urban areas in the country based on all releases per square mile.



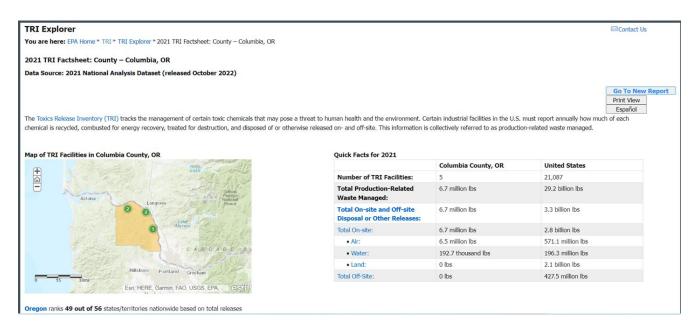
Looking at production-related waste managed over time helps track progress in reducing waste generated and moving toward safer waste management methods. EPA encourages facilities to first eliminate waste at its source (source

The ten facilities in the Longview 98632 zip code with 2021 reports to EPA are-EAGLE US 2 LLC - LONGVIEW 3541 INDUSTRIAL WAY, LONGVIEW, WA 98632 **FXI INC. - LONGVIEW** 1205 PRUDENTIAL BLVD, LONGVIEW, WA 98632 GLACIER NORTHWEST INC LONGVIEW READY-MIX PLANT 1100 THIRD AVE, LONGVIEW, WA 98632 3401 INDUSTRIAL WAY GATE 10 AREA 42, LONGVIEW, WA 98632 HASA INC INTERFOR LONGVIEW DIV 540 THIRD AVE, LONGVIEW, WA 98632 NIPPON DYNAWAVE PACKAGING CO. 3401 INDUSTRIAL WAY, LONGVIEW, WA 98632 NORTH PACIFIC PAPER CO LLC LONGVIEW 3001 INDUSTRIAL WAY, LONGVIEW, WA 98632 SKYLINE STEEL LLC-LONGVIEW 9 INTERNATIONAL WAY, LONGVIEW, WA 98632 SOLVAY CHEMICALS INC 3500 INDUSTRIAL WAY, LONGVIEW, WA 98632 WESTROCK LONGVIEW LLC 300 FIBRE WAY, LONGVIEW, WA 98632

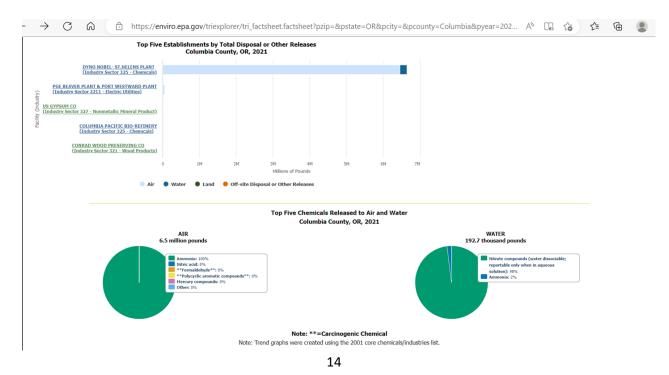
One facility is in Kelso 98626-FOSTER POULTRY FARMS KELSO PLANT 1700 S 13TH AVE, KELSO, WA 98626

There are two reporting just across the Columbia River in Rainier, OR 97048 CONRAD WOOD PRESERVING CO 29175 DIKE RD, RAINIER, OR 97048 US GYPSUM CO 29073 DIKE RD, RAINIER, OR 97048

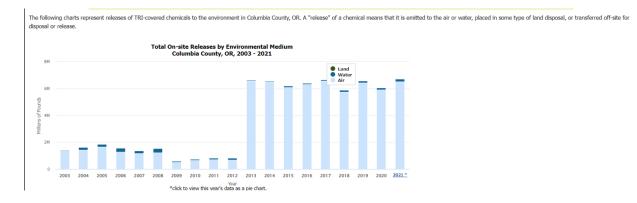
Across the Columbia River, Columbia County, OR released 6.5 million pounds of toxic chemicals to the air, or more than the entire state of Washington reported in 2021. There is no magic fence line in the Columbia River that separates the Columbia County air shed from residents in Cowlitz County.



Most of the Columbia County emissions are ammonia, NH<sub>3</sub>, an EPA CAP, released from Dyno Nobel at Deer Island, about 15 miles upstream from Longview-Kelso.

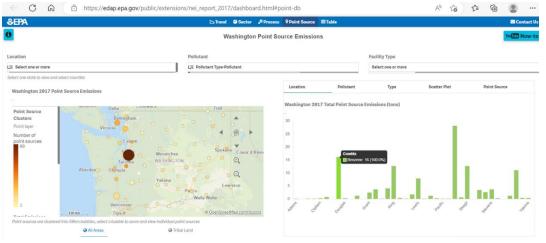


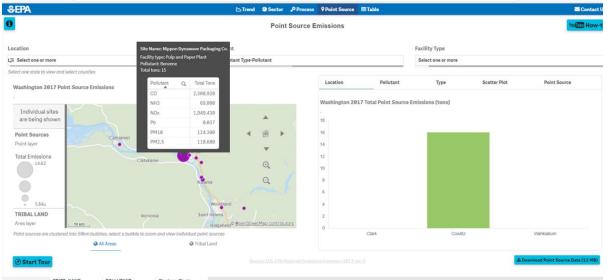
The astronomical increase in emissions began in 2013.



While the air pollution overburdened communities program is focused on criteria air pollutants, hazardous air pollutants can also be indicative and should be included in pollutants affecting communities.

Benzene is of concern and Cowlitz County ranks high in point source emissions.





Nippon Dynawave is the chief point source.

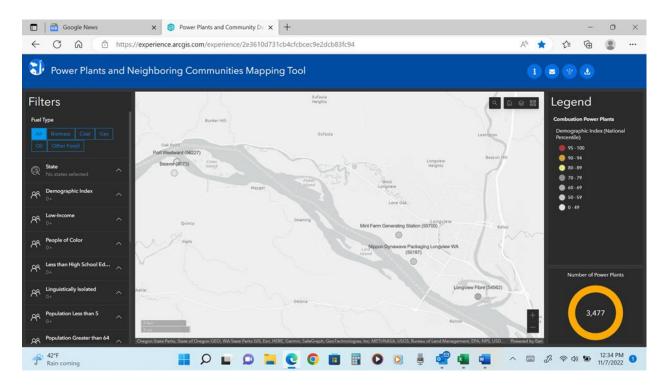
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TATE 11	STATE FIPS 11	COUNTY 11	COUNTY FIPS	11 FACILITY 11	ADDRESS 11	CITY 11	ZIP CODE 11	POLLUTANT 11	POLLUTANT TYPE 11	EMISSIONS pr. 1	UNIT OF MEASURE 11	FACILITY TYPE 11	NAJCS TI	NAICS DESCRIPTION
eA.	53	Cowlitz	\$815	WestRock Longview, LLC	300 Fibre Way	Longview	90632	Acetaldehyde	10.0	79424	LB	Pulp and Paper Plant	322130	PAPERBOARD MICLS
a.	53	Cowlitz	53015	North Pacific Paper Company (NORPAC)	3001 Industrial Way	Longview	99632	Acetaldehyde	HAR	64504	(a) (	Pulp and Paper Plant	322122	NEWSPRINT MILLS
uA.	53	King	53033	Seattle-Tacoma Intf	Unknown	Seattle	00000	Acetaldehyde	1002	49115.19112982	18	Airport	40011	AIRPORT OPERATIONS
IA.	53	Yakinia	\$3077	Yakama Porest Products	251 Medicine Valley Road	White Swan	90952	Acetaldehyde	10.0	30400	1.0		321113	SAWMILLS.
eA.	53	Jefferson	53031	Pt Townsend Paper	150 Mill Road	Port Townsend	98368	Acetaidehyde	нар	26500	LB	Pulp and Paper Plant	322121	PAPER (EXCEPT NEWSPRINT) MILLS
IA.	53	Visita Visita	53071	Packaging Corporation of America	31831 W Hwy 12	Wallula	99363	Acetaldehyde	нир	25331	LB	Pulp and Paper Plant	322130	IMPERBOARD MILLS.
IA.	53	Cowille	\$3015	Toppon Dynawave Packaging Co	3401 Industrial Way	Longview	98632	Acetaldehyde	442	22944	1.0	Pulp and Paper Plant	312110	PULP MILLS.
eA.	53	Lewis	53541	Hampton Lumber Milts/Cowitz Division - Randle	10166 US Highway 12	Randle	98377	Acetaldehyde	нир	22090.8	18	Lumber/Sewmill	323113	SAWMILLS.
uh.	53	Grays Harbor	53027	Sierra Pacific Industries	301 Hagara Street	Aberdeen	98520	Acetaldehyde	HAP	21004	L8	Lumber/Sawmill	321113	SAWMILLS.
EA.	53	Skagit	53057	SIERRA PACIFIC INDUSTRIES	14253 Mcfarland Road	Mount Vernon	98273-8232	Acetaldehyde	HAP-	19299	LB	Lumber/Sawmill	321113	SAMMULS.

Another is **acetaldehyde**. Cowlitz County emitters rank 1<sup>st</sup>, 2<sup>nd</sup>, and 7<sup>th</sup> in the state.

For **methanol** Cowlitz Co emitters rank 1<sup>st</sup>, 3<sup>rd</sup>, and 7th in the state. For **mercury** 6<sup>th</sup> and 9<sup>th</sup>. For **formaldehyde** 6<sup>th</sup> and 7<sup>th</sup>, according the 2017 NEI. This summary is not exhaustive.

The Longview-Kelso area is also home to several electric power generators, consuming gas, biomass, and coal, with their concomitant emissions.



It is inexcusable any electricity in Washington should be generated by coal (accepting TransAlta coalfired generation will soon be shuttered). Yet Nippon Dynawave (formerly Weyerhaeuser) has been burning coal in its boilers forever along with black liquor and other fossil fuels. Weyerhaeuser/Nippon Dynawave owns its own gas pipeline to the site and uses gas for cogeneration, as does WestRock/Longview Fibre. Nippon sells this power back to the Bonneville power grid.

Nippon Dynawave consumes about 80,000 tons of coal per year, which is railed in open rail cars to the Northwest Alloys, formerly Millennium, site. It is supposed to be stored under cover. Lately the full rail cars sitting along the rail line brings that contracted requirement into question. We should all be well versed by now in the air pollution caused by coal dust.

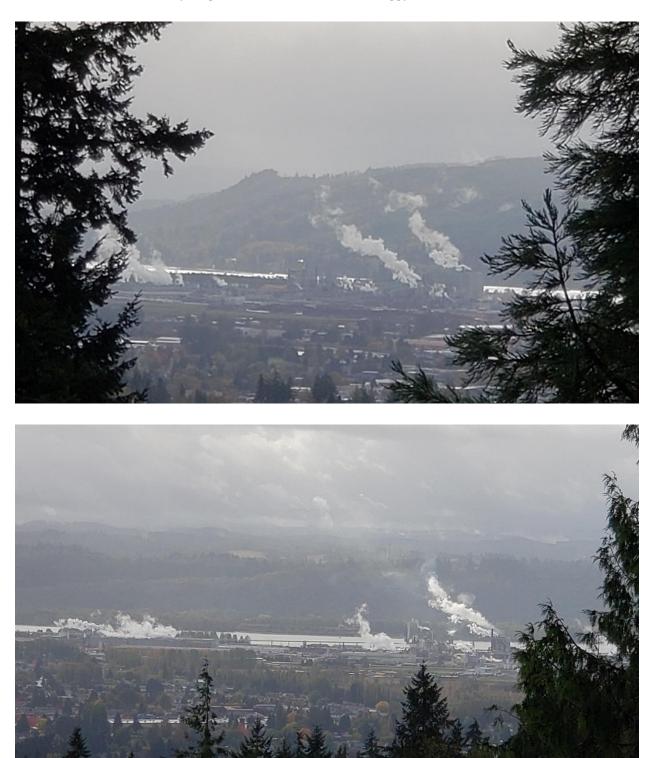
Regardless of other emissions, using an EPA conversion table, burning 80,000 tons of sub-bituminous coal per year produces about 150,000 tons of CO<sub>2</sub>.

An additional note about coal dust from unit trains of coal. The south Kelso census tract, already indicated as overburdened by several factors, is adjacent not only to the regional airport, but is bordered by the BNSF rail line on the west and I-5 on the east. Unit trains of coal continue to traverse this route to Canadian export ports.

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	to previous page me: Nppon Dynawave Packaging Long A   Sector: Industrial CHP   View in c TERNORDER  Time-series		Operator: Nip	opon Dynawave Pac	2021	
Pi	- API	•	2018	2019	2020	2021 Quarterly Monthly
	Fuel consumption quantity	0		2019	2020	2021
10	All primemovers (ALL)	0				
	Bituminous coal (BiT) (tons)	1				44
۰.	Black liquour (BLQ) (tons)	1	927,338	852,007	797,884	916,851
	Distillate fuel oil (DFO) (barre	is) I	1,040	1,163	472	330
4	Natural gas (NG) (mcf)	1	1,906,367	2,722,289	2,965,002	2,793,280
8.	Residual fuel oil (RFO) (barre	15)	20,581	8,920	11,750	20,091
۹.	Sludge waste (SLW) (tons)	1	42,386	45,820	47,931	45,602
	Subbituminous coal (SUB) (to	ns) [	73,503	78,874	81,938	78,773
	Wood/wood waste solids (WD	S) (tons)	163,711	164,544	165,789	153,983
+0,	Steam turbine (ST)					
	Bituminous coal (BIT) (Ions)	(	-	2 (Q	140	-
	Black liquour (BLQ) (tons)	(	927.338	852.007	797,884	916,851
۹.	Distillate fuel oll (DFO) (barre	(S)	1,040	1,163	472	330
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The air shed over the relatively small geographic area of Longview and Kelso is pumped with air pollutants from multiple sources, both point and non-point. Surrounded by high hills, the community oftentimes sits in a bowl of air. In the 37 years I have lived here at 850' elevation and with a view of the entire river valley to Kalama, I have seen the air currents sweep the lower-level fogs out in the morning and in in the evening. Winter prevailing winds often come in from the south. In summer from the north or northwest. At times I am above the fog that sits in the valley and at other times the air rises and envelops the higher elevations. Smokestack plumes do not dissipate their pollutants above and out of

residential air spaces. I know downtown residents who regularly complain their air stinks. The same is true for the rarified air in my neighborhood, often when it is foggy.



The recent wildfires have brought evidence the one regulatory PM 2.5 monitor in Longview is insufficient to monitor ambient air levels of the many pollutants in the Longview-Kelso area. When comparing multiple readings over several days of the Longview monitor to the Purple Air network monitors, with conversions and averages, it became apparent the Longview monitor regularly underreported particle emissions. Part of this may be due elevations of the monitoring stations. Folks with health concerns who relied on the Longview data on the AirNow website and in the newspaper were badly informed about the real-time health impacts from the outside air. I have recently installed a Purple Air monitor at my residence, the highest in elevation of the now three PAMs in the Longview area. I will be glad to share data I've been collecting. I have already shared these concerns with Dept. of Ecology and SWCAA, Uri Papish. At the very least, an additional monitor should be sited in south Kelso, and another at a couple hundred feet elevation.

I'd like to say this is all, but it's not. Currently there is a comment period for an AOP modification and NOC Order 21143 for WestRock Longview for a new cardboard plant and new natural gas boiler. Expected additional air pollution impacts for the area are-

- Carbon monoxide, 2.9 tons per year (tpy)
- Nitrogen oxides, 1.4 tpy
- Particulate matter less than 10 micrometers in diameter, 2.3 tpy
- Particulate matter less than 2.5 micrometers in diameter, 1.3 tpy
- Total suspended particulate, 7.8 tpy
- Sulfur dioxide, 0.1 tpy
- Volatile organic compounds, 10.7 tpy
- Lead, 0.000065 tpy
- Toxic air pollutants, 0.95 tpy
- Greenhouse gases (as carbon dioxide equivalents), 14,421 metric tpy

Also in the works is a project at Longview Mint Farm Industrial Park for an anaerobic biodigester with injection of RNG into the Cascade Gas pipeline, by Divert Inc. This company does not have a good track record on previous projects for air pollution controls. Their SEPA checklist anticipates a 2 million BTU/hour gas boiler, flare stack, multiple toxic emissions, and almost 20,000 tons/yr GHG emissions. Air discharge permit application to SWCAA CO-1058.

Please designate Longview-Kelso a community overburdened by air pollution. Please assign new continuous air monitoring stations to our area.

Thank you,

Diane L. Dick Longview, WA