



October 30, 2022

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Via Web Upload: <https://aq.ecology.commentinput.com/?id=MaBWc>
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Re: DRAFT: Identifying Overburdened Communities Highly Impacted by Air Pollution

Erin Torrone et al:

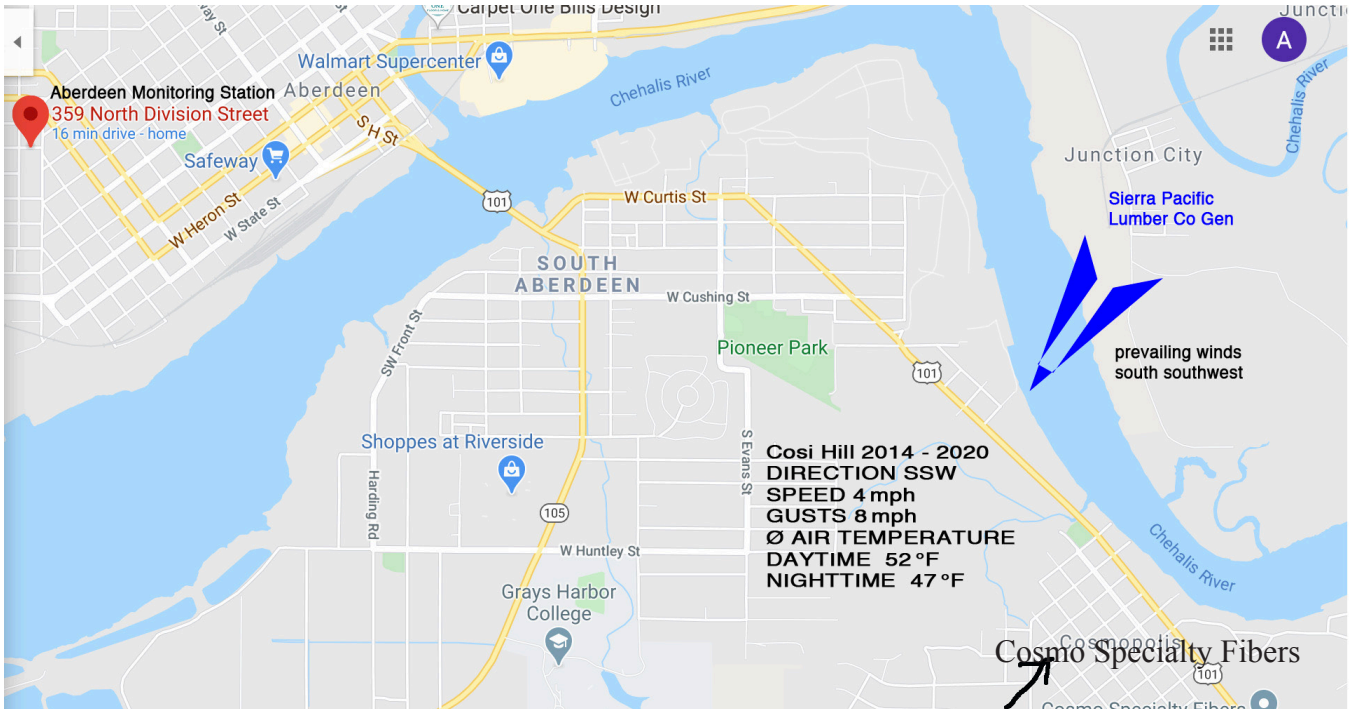
Thank you for this opportunity to comment on the above referenced matter. We recognize that this is a complex balance and hope our input will be of assistance in making decisions that will benefit the environment, visitors to our area and the residents of lower Chehalis WRIA. We incorporate by reference those comments made by Twin Harbors Waterkeepers.

FOGH is a broad-based 100% volunteer tax-exempt 501(c)(3) citizens group made up of crabbers, fishers, oyster growers and caring citizens. The mission of FOGH is to foster and promote the economic, biological, and social uniqueness of Washington's estuaries and ocean coastal environments. The goal of FOGH is to protect the natural environment, human health and safety in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment.

We commented on the recent air quality permits updates for Sierra Pacific Industries Lumber Mill (Sierra Pacific), and the Cosmo Specialty Fiber Mill (Cosmo).

Outdoor air quality is not usually under the control of the individual, so it is important that we all do our part to minimizing pollution to it. We all have to breathe –23,000 times a day – the air we are provided. Every breath we take contains a gaseous soup of particles that are afloat in it. Depending on the surrounding contributors, that soup may contain argon, carbon dioxide, ozone, methane, methanol, formaldehyde, sulfur dioxide, VOCs, HAPs, nitrous oxide...the list goes on and on.

This potentially toxic soup can be exacerbated by cumulative effects of similarly polluting industries in nearby locations. The nearby Cosmo Specialty Fiber Mill shares the prevailing winds of the Sierra Pacific Lumber Mill. Unfortunately, the official monitoring station for both industries is located Northwest of the physical plants and the prevailing winds blow South Southwest. Based on the location of the monitor, it is doubtful that the air of Sierra Pacific and/or Cosmo plants actually gets measured. (See attached map, next page)



Accurate measurements of air quality are critically important to people with respiratory issues, people with diabetes, older adults, children, and pregnant women. All of whom are more likely to be affected by unhealthy levels of particle pollution. A 2015 study in the European Review for Medical and Pharmaceutical Sciences (<https://www.europeanreview.org/article/8346>) concluded that, "...Air pollution is a leading cause of insulin resistance and incidence of type 2 diabetes mellitus..."

Unfortunately, Grays Harbor has been ranked at the bottom of the barrel for health outcomes and is ranked among the least healthy counties in Washington State. As the attached Daily World article shows, in 2012 we ranked 39th out of 39 counties, and have only improved to 35th worst in 2022. And yet the Harbor was not a listed community.



We are concerned that the methodology for determining communities at risk from air pollution has not analyzed health outcomes, monitor location and whether industry monitoring has adequately reported the incidents of exceedence. Since permits are self-reported, site visits are infrequent, and independent monitoring does or may not seem to be appropriately located, we think further consideration needs to be taken.

We hope that the Department of Ecology will recognize these public health concerns and reconsider the allowable pollutants, methods of identification and taking into account the cumulative effects of other industrial operations in the adjacent area. It concerns us that the Harbor Communities are not listed or considered in your study.

Thank you in advance for your consideration of these concerns.

Sincerely,



Arthur (R.D.) Grunbaum
President

Cc: Knoll Lowney

