

Diane Dick

Thank you for the opportunity to comment on designating communities overburdened by air pollution. Please designate the Longview-Kelso area as an overburdened community. My complete comments with documentation, PDF 19 pp, are attached.

November 8, 2022

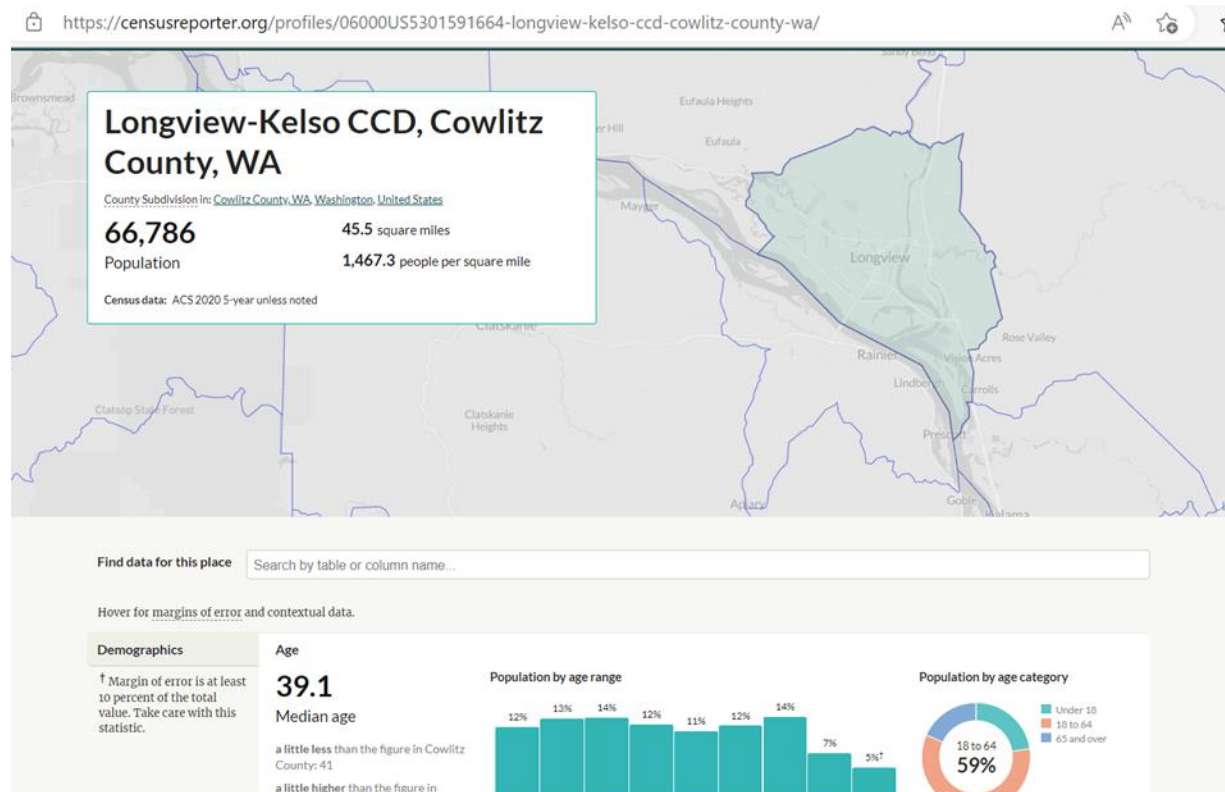
To: Washington Department of Ecology

## Identifying Overburdened Communities Highly Impacted by Air Pollution

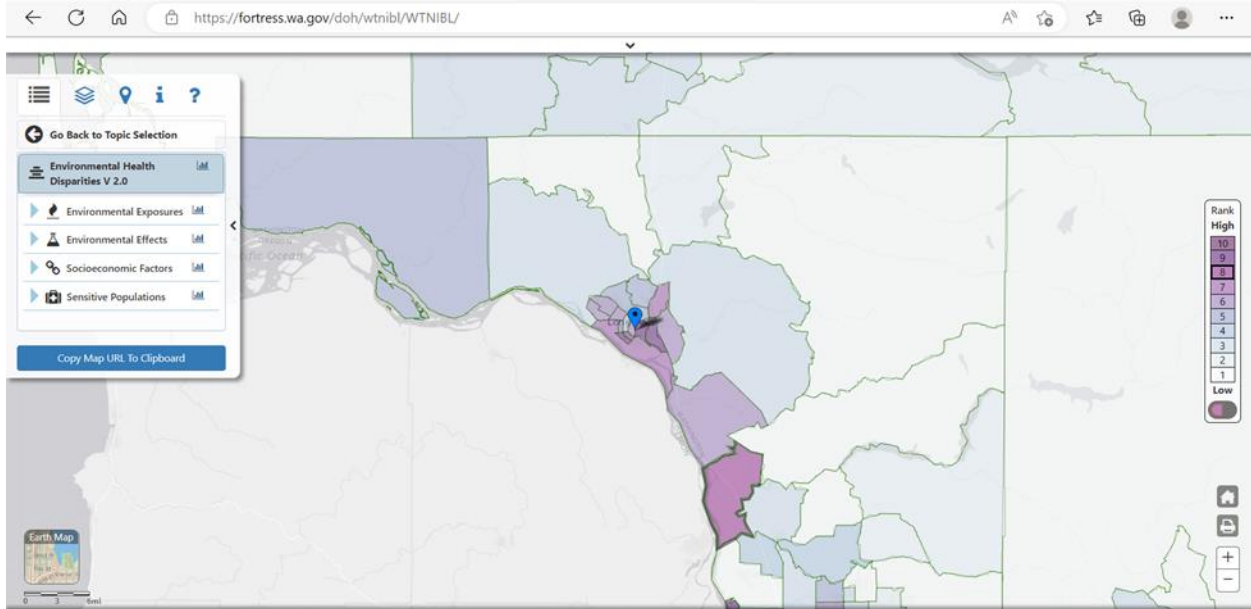
Formal Comments- Diane L. Dick, 13 Saint Helens Lane, Longview, WA 98632 [DICKDL50@gmail.com](mailto:DICKDL50@gmail.com)

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.

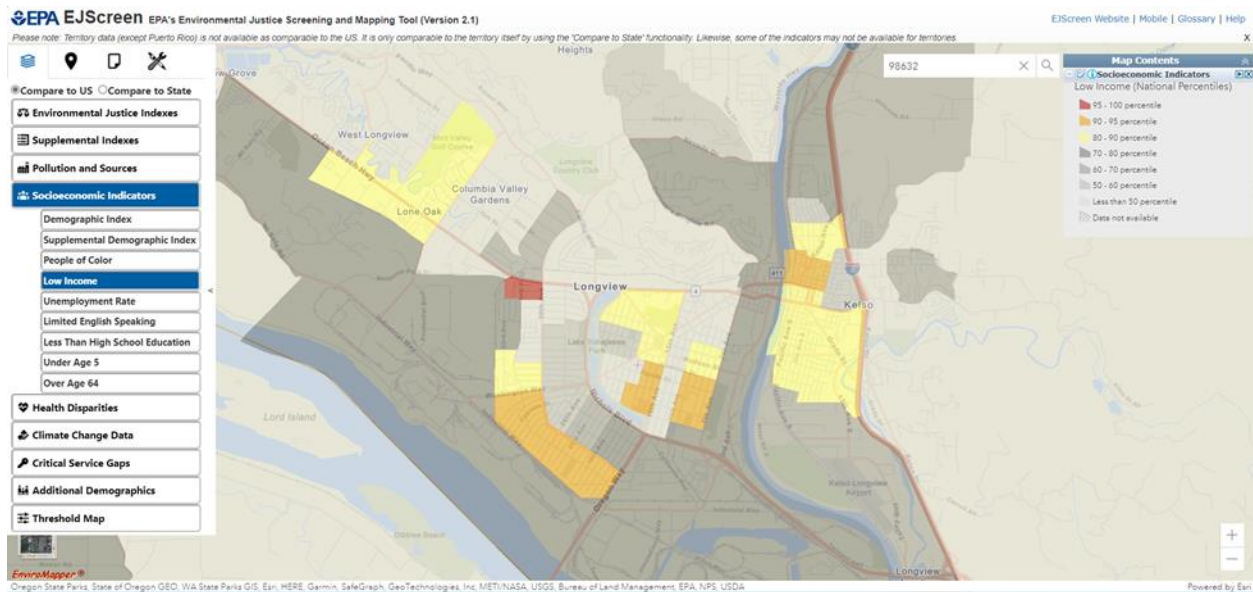
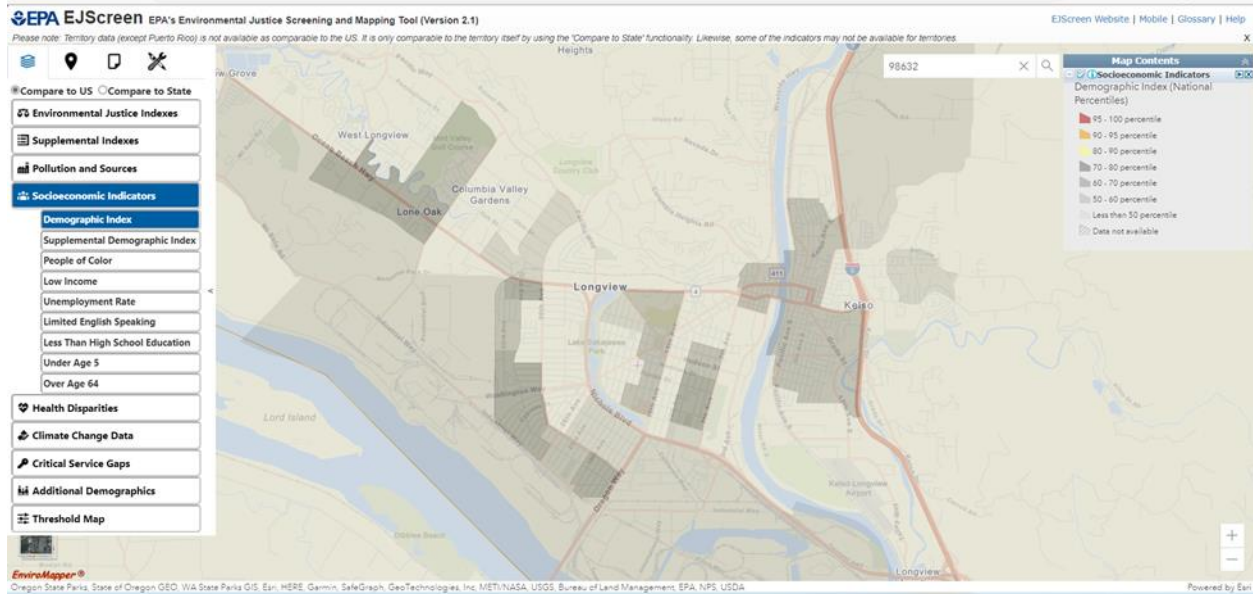
Longview and Kelso comprise 24 square miles within Cowlitz County's 1,140 square miles and contain 50,543 of the county's 111,524 residents. An alternate county subdivision is the Longview-Kelso CCD. The community lies in a river valley at the confluence of the Columbia, Cowlitz, and Coweeman Rivers. 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.

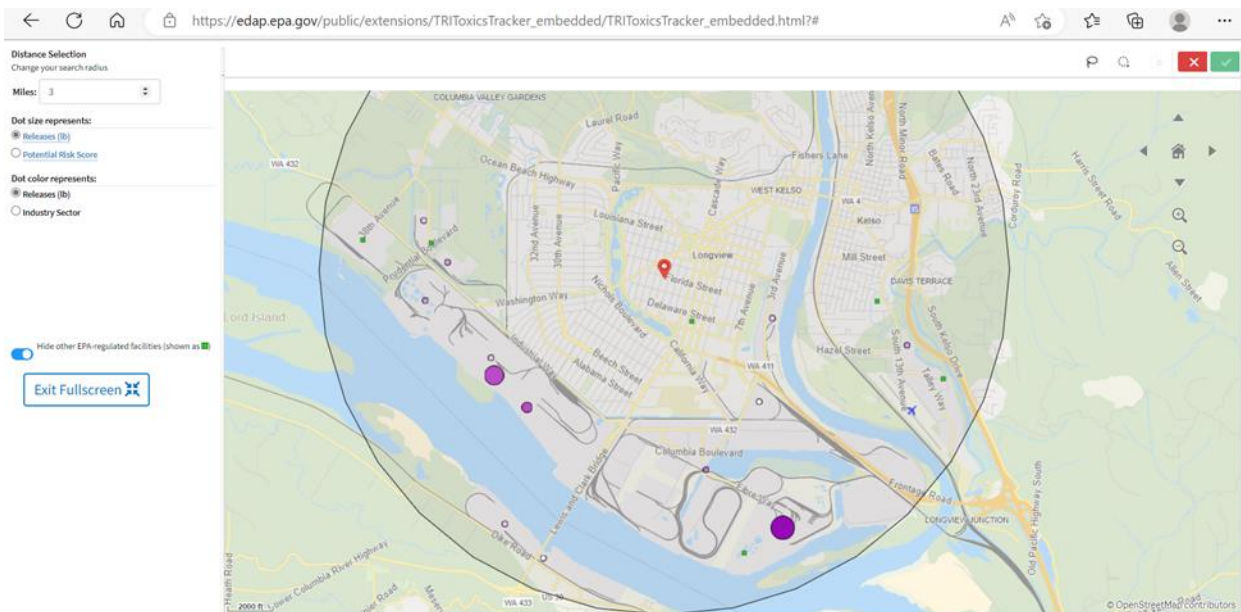
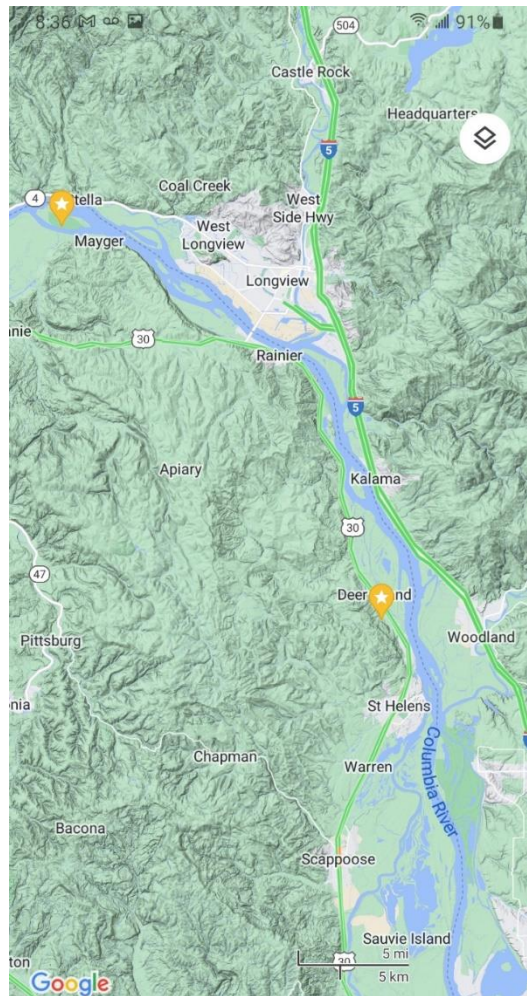


Washington Department of Ecology then requires indicators of air pollution by elevated levels of criteria air pollution derived from Table 2. Criteria Pollutant Thresholds of the Technical Support document Publication 22-02-044. The probability of a general community member to determine such pollutant 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.

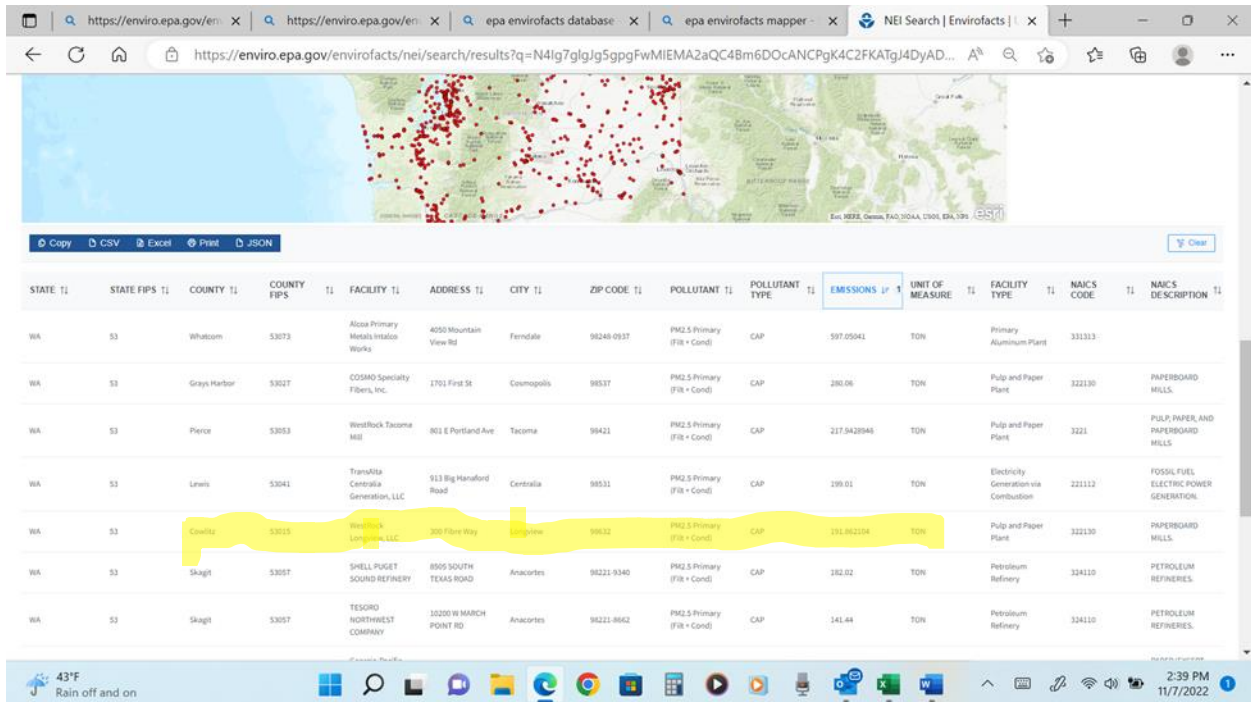
Another air pollution indicator is “emissions over distance from stationary sources.” While Ecology explains their method, they do not supply the results for community use. I also question why ammonia, NH<sub>3</sub>, is not included as a criteria air pollutant, as EPA does.

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.

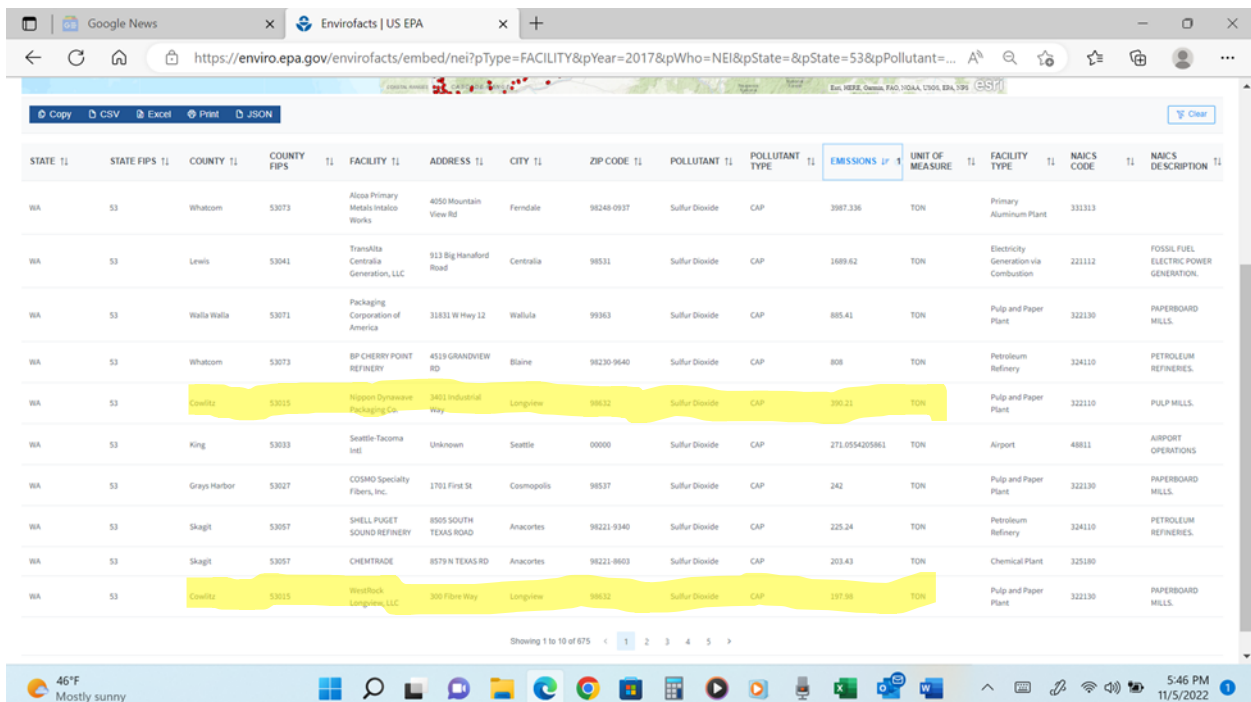


The following data is from EPA 2017 NEI, which shows emissions in the 3 mile Longview-Kelso radius compared to other areas and emitters in the state.

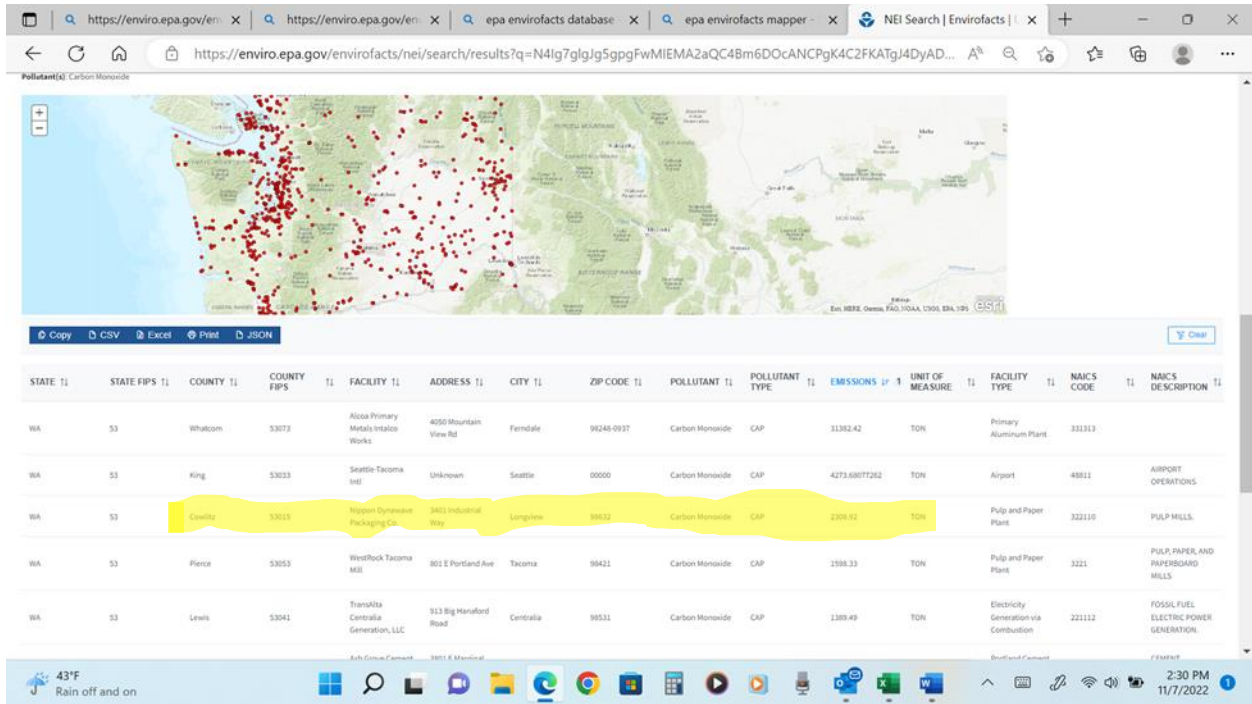
### PM 2.5 WestRock Longview, 5<sup>th</sup> highest emitter in the state



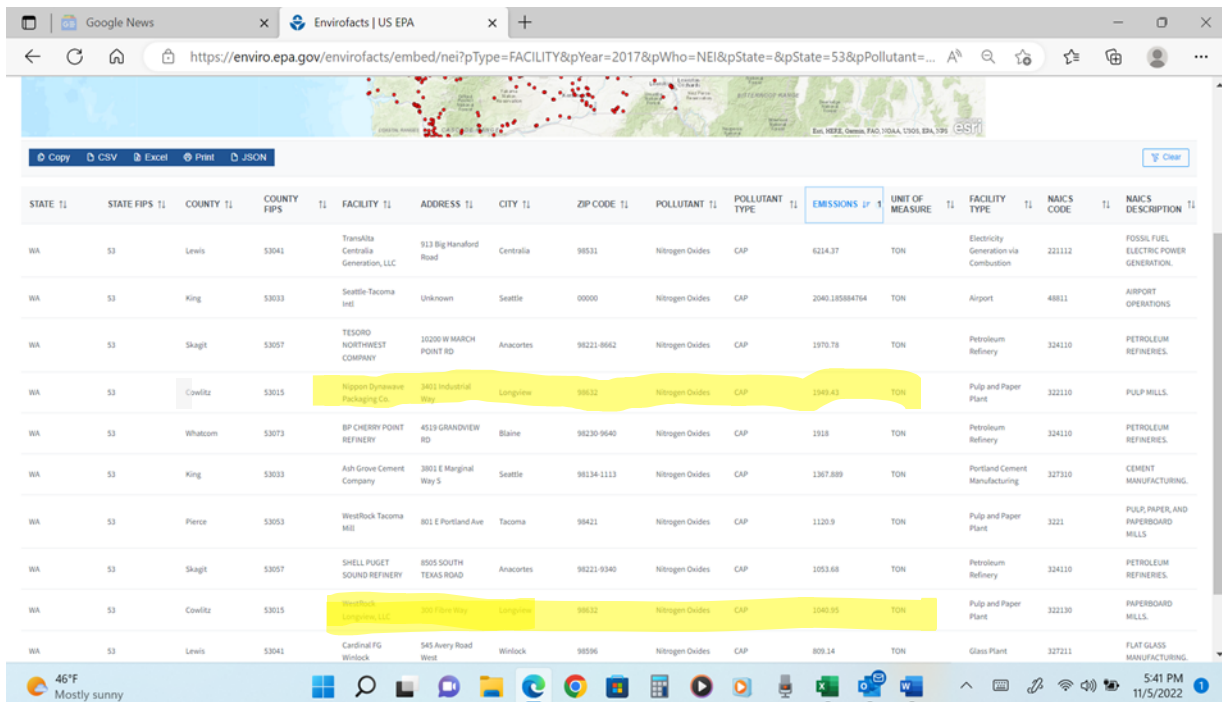
### SO<sub>2</sub>- Nippon Dynawave and WestRock Longview, 5<sup>th</sup> and 10<sup>th</sup> highest emitters



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



## NOx- Nippon Dynawave and WestRock Longview, 4<sup>th</sup> and 9<sup>th</sup> highest emitters



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

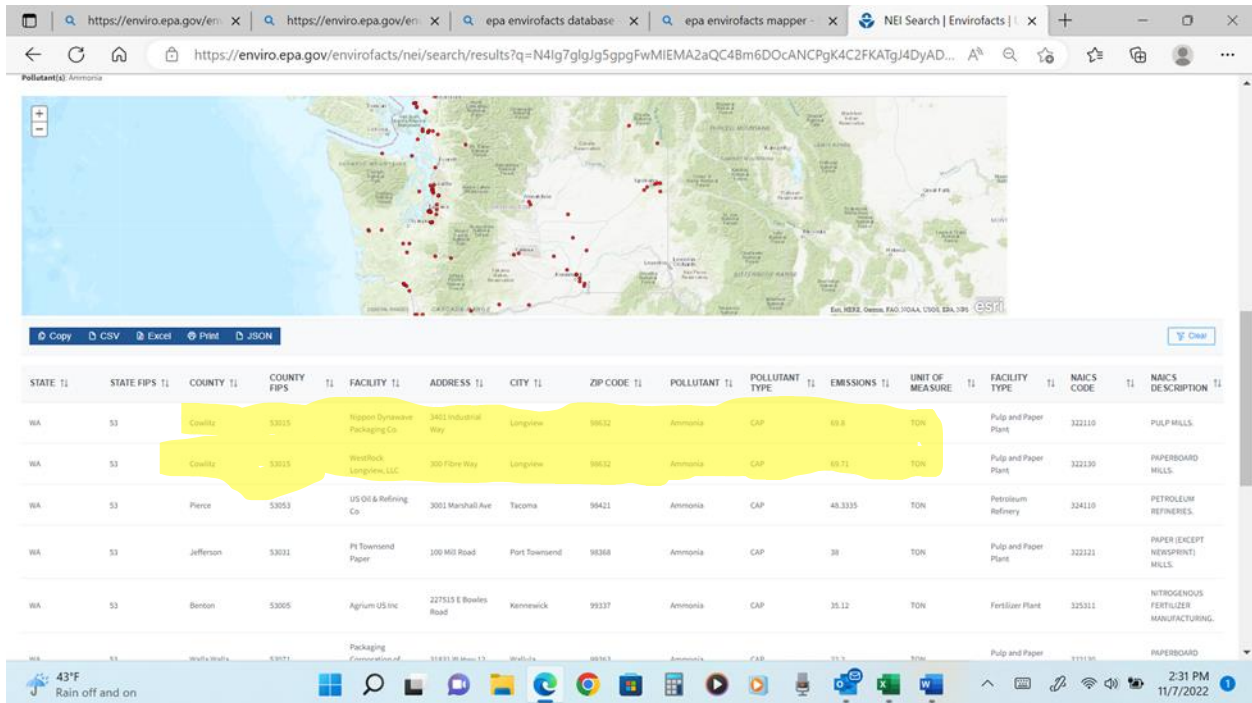
STATE	STATE FIPS	COUNTY	COUNTY FIPS	FACILITY	ADDRESS	CITY	ZIP CODE	POLLUTANT	POLLUTANT TYPE	EMISSIONS	UNIT OF MEASURE	FACILITY TYPE	NAICS CODE	NAICS DESCRIPTION
WA	53	Whatcom	53073	PHILLIPS 66 Ferndale Refinery	3901 UNICK RD	Ferndale	98249 9003	Volatile Organic Compounds	CAP	972	TON	Petroleum Refinery	324110	PETROLEUM REFINERIES
WA	53	Skagit	53057	TESORO NORTHWEST CORPNEY	10200 W MARCH POINT RD	Anacortes	98221 8862	Volatile Organic Compounds	CAP	863.49	TON	Petroleum Refinery	324110	PETROLEUM REFINERIES
WA	53	King	53033	Seattle-Tacoma Intl	Unknown	Seattle	00000	Volatile Organic Compounds	CAP	651,445,637,815	TON	Airport	48811	AIRPORT OPERATIONS
WA	53	Snohomish	53061	Boeing Commercial Airplane Group-Everett	3003 W Casino Rd	Everett	98204	Volatile Organic Compounds	CAP	487,886	TON	Aircraft, Aerospace, or Related Parts Plant	336411	AIRCRAFT MANUFACTURING
WA	53	Skagit	53057	SHELL PUGET SOUND REFINERY	8505 SOUTH TEXAS ROAD	Anacortes	98221 8340	Volatile Organic Compounds	CAP	429.13	TON	Petroleum Refinery	324110	PETROLEUM REFINERIES
WA	53	Yakima	53077	Novolex Shields, LLC	1009 Rock Avenue	Yakima	98902	Volatile Organic Compounds	CAP	329	TON		326112	PLASTICS PACKAGING FILM AND SHEET (INCLUDING LAMINATED) MANUFACTURING
WA	53	Whatcom	53073	BP CHERRY POINT REFINERY	4519 GRANDVIEW RD	Blaine	98230 9640	Volatile Organic Compounds	CAP	322	TON	Petroleum Refinery	324110	PETROLEUM REFINERIES
WA	53	King	53033	Boeing Commercial Airplane Renton	737 Logan Ave N Bldg 4-88 (5th & Logan)	Renton	98055	Volatile Organic Compounds	CAP	236,714	TON		336411	AIRCRAFT MANUFACTURING
WA	53	Cowlitz	53015	North Pacific Paper Company (NPPAC)	3001 Industrial Way	Longview	98632	Volatile Organic Compounds	CAP	249.4	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.

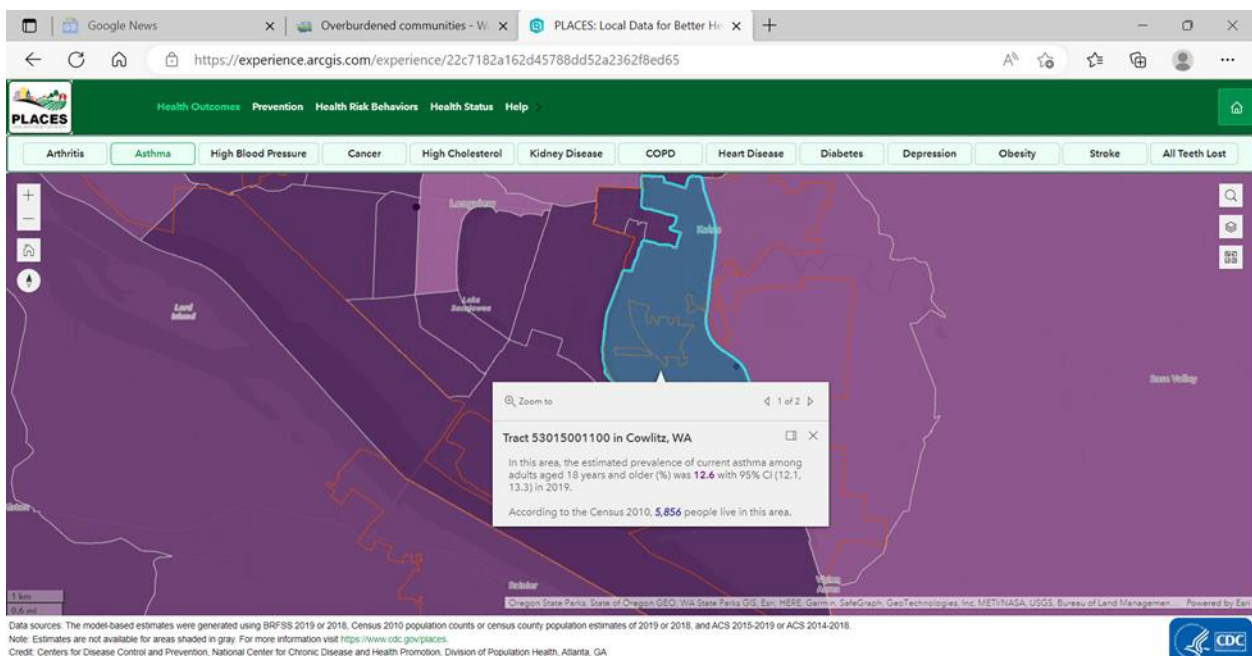
STATE	STATE FIPS	COUNTY	COUNTY FIPS	FACILITY	ADDRESS	CITY	ZIP CODE	POLLUTANT	POLLUTANT TYPE	EMISSIONS	UNIT OF MEASURE	FACILITY TYPE	NAICS CODE	NAICS DESCRIPTION
WA	53	Kittitas	53037	Bowers Field	Unknown	Ellensburg	00000	Lead	CAP/HAP	284,0987912	LB	Airport	48811	AIRPORT OPERATIONS
WA	53	Citlatam	53009	William R Fairchild Int	Unknown	Port Angeles	00000	Lead	CAP/HAP	283,712632	LB	Airport	48811	AIRPORT OPERATIONS
WA	53	Whatcom	53073	BP CHERRY POINT REFINERY	4519 GRANDVIEW RD	Blaine	98230 9640	Lead	CAP/HAP	275	LB	Petroleum Refinery	324110	PETROLEUM REFINERIES
WA	53	Grant	53025	Grant County Intl	Unknown	Moses Lake	00000	Lead	CAP/HAP	271,479236	LB	Airport	48811	AIRPORT OPERATIONS
WA	53	Lewis	53041	Chelan- Centralia	Unknown	Chelan	00000	Lead	CAP/HAP	250,38431	LB	Airport	48811	AIRPORT OPERATIONS
WA	53	Whatcom	53073	Bellingham Intl	Unknown	Bellingham	00000	Lead	CAP/HAP	234,559714	LB	Airport	48811	AIRPORT OPERATIONS
WA	53	Cowlitz	53015	Kelso Longview	Unknown	Kelso	00000	Lead	CAP/HAP	215,54891	LB	Airport	48811	AIRPORT OPERATIONS
WA	53	Whatcom	53073	Alcoa Primary Metals/Intalco Works	4050 Mountain View Rd	Ferndale	98248 0937	Lead	CAP/HAP	210.2	LB	Primary Aluminum Plant	331313	
WA	53	Spokane	53063	Deer Park	Unknown	Deer Park	00000	Lead	CAP/HAP	204,9348	LB	Airport	48811	AIRPORT OPERATIONS
WA	53	Douglas	53017	Pangborn Memorial	Unknown	Wenatchee	00000	Lead	CAP/HAP	199,191066	LB	Airport	48811	AIRPORT OPERATIONS

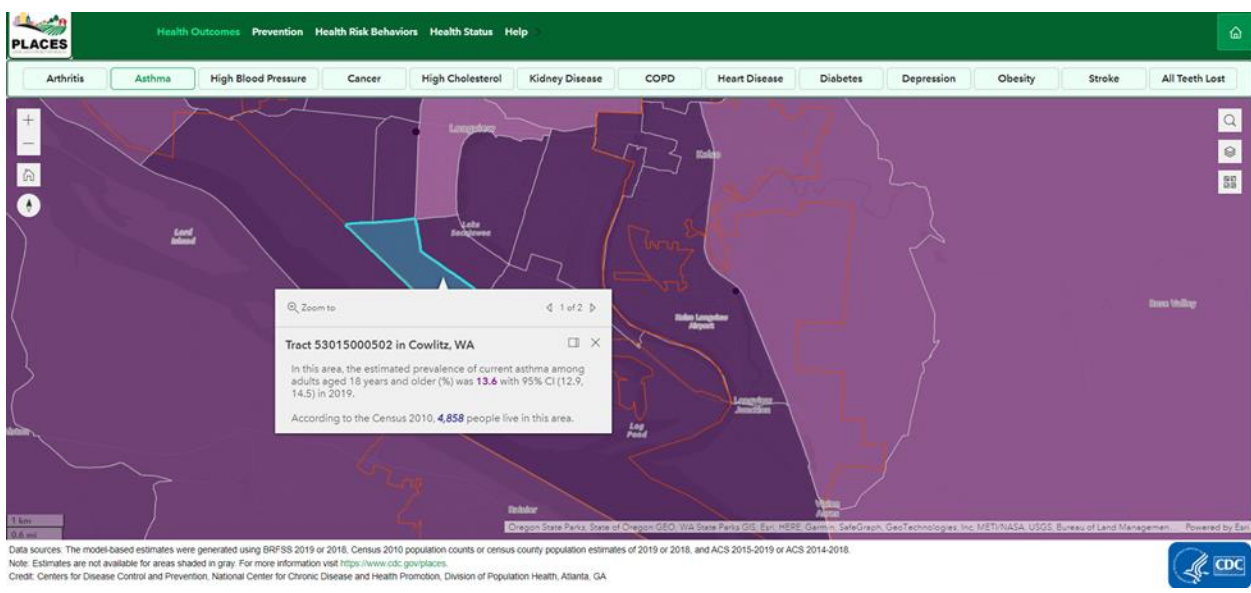
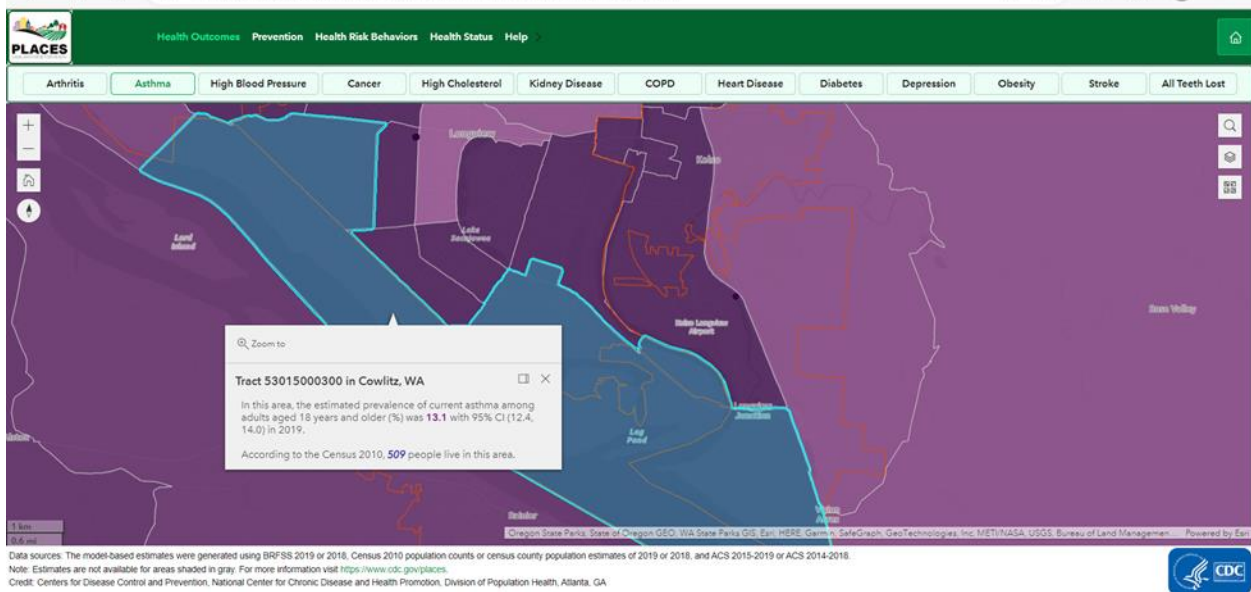


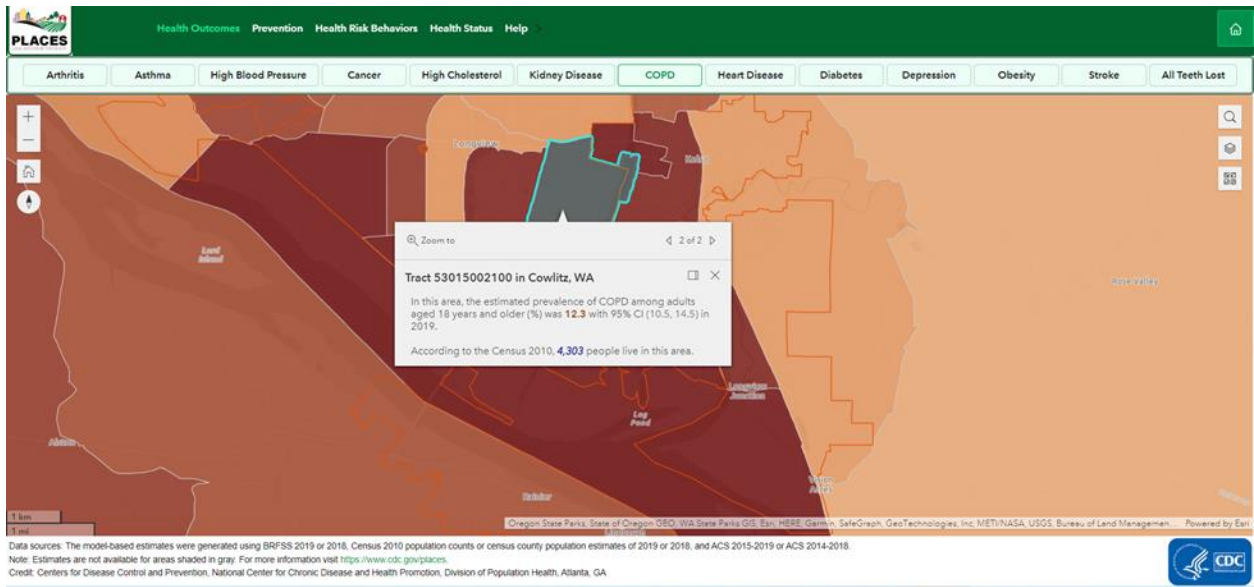
**NH<sub>3</sub>**- As EPA considers ammonia a CAP, this pollutant bears noting. Nippon Dynawave and WestRock Longview are the two highest emitters in the state. As noted further on, across the Columbia River at Deer Island, Oregon, about 15 miles upstream from Longview-Kelso, Dyno Noble released over 6 million pounds, or 3000 tons, of ammonia on-site to the air.



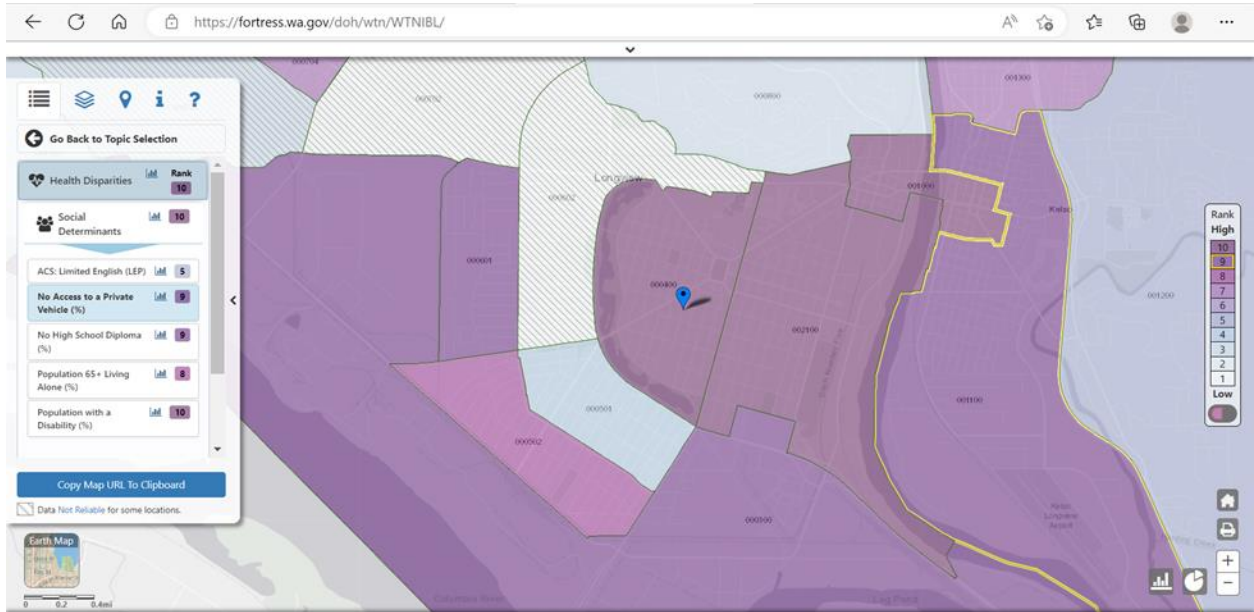
Below is data for Longview-Kelso census tracts for asthma and COPD from PLACES: Local Data for Better Health showing rates higher than the national average.



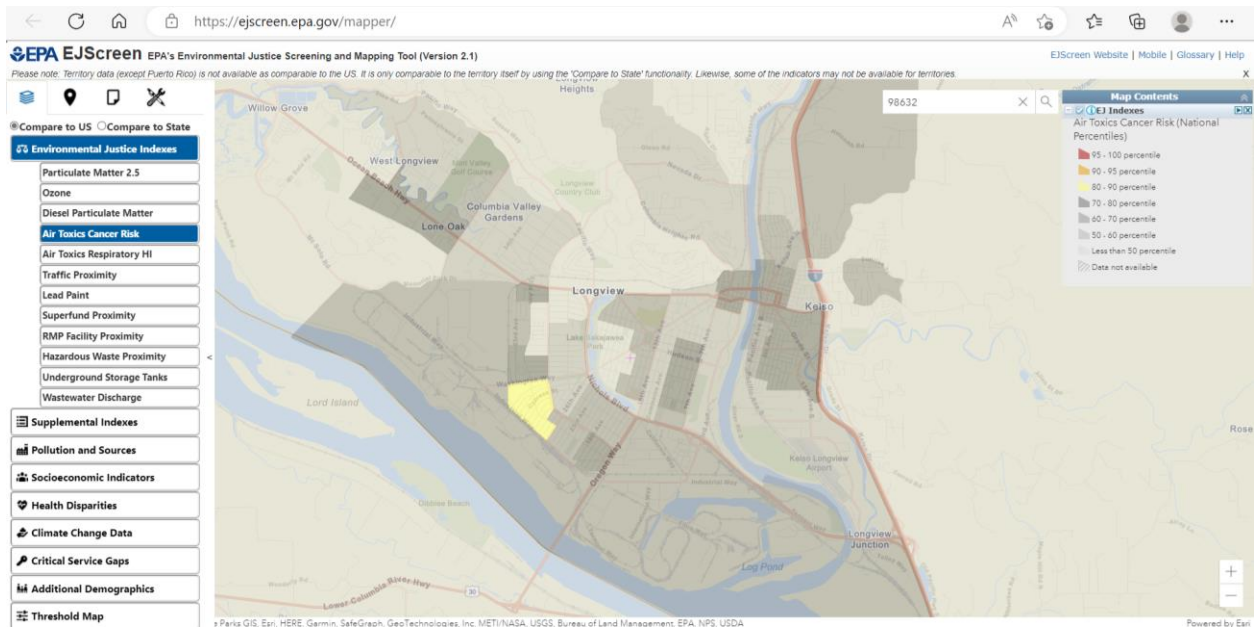




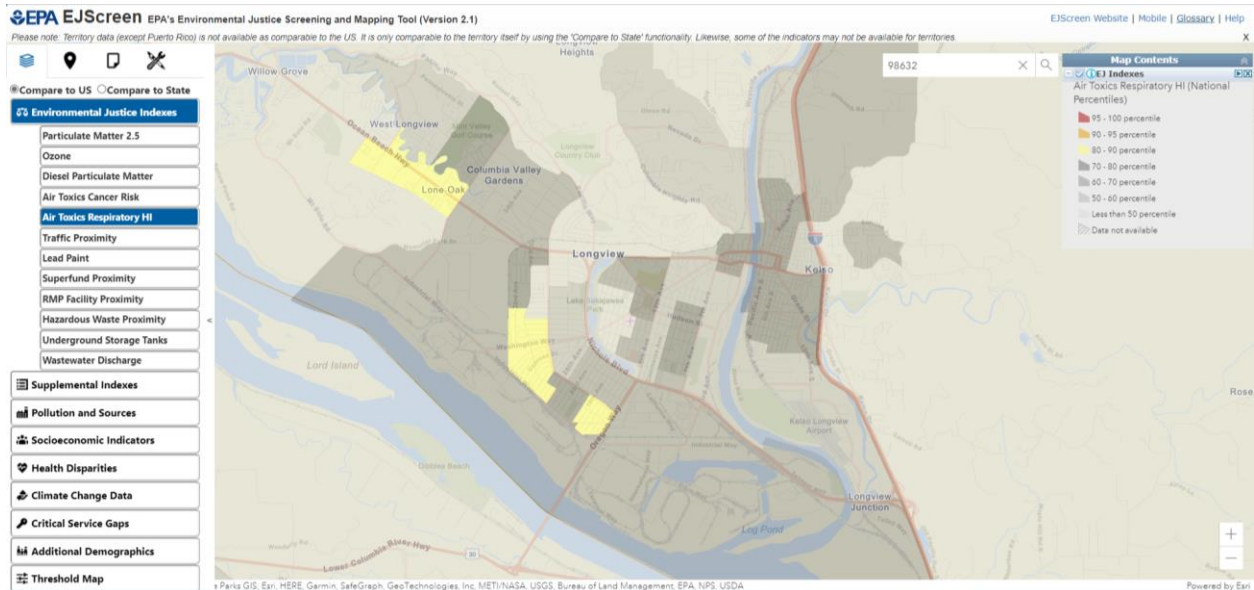
### Households with no access to private vehicle-



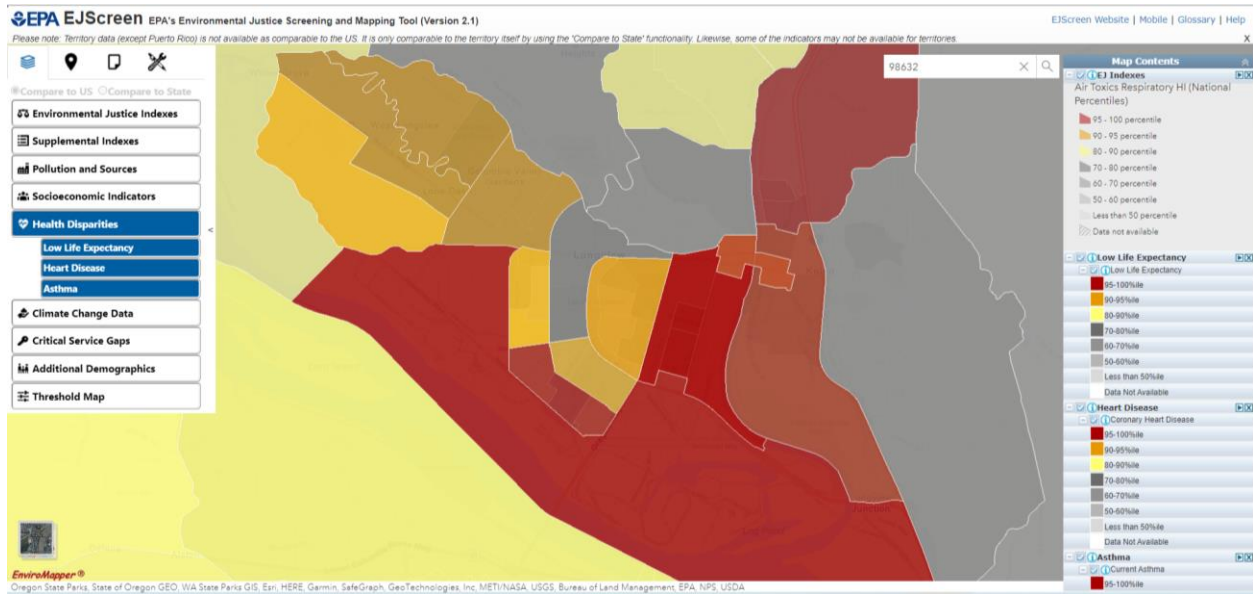
According to the EPA environmental justice mapping tool, almost all of Longview-Kelso is above the 50th percentile for air toxics cancer risk, with neighborhoods closest to industry sites and transportation corridors reaching the 70<sup>th</sup> to 90<sup>th</sup> percentiles.



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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You are here: EPA Home \* TRI \* TRI Explorer \* 2021 TRI Factsheet: County – Cowlitz, WA

**2021 TRI Factsheet: County – Cowlitz, WA**

Data Source: 2021 National Analysis Dataset (released October 2022)

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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 managed.



**Quick Facts for 2021**

	Cowlitz County, WA	United States
<b>Number of TRI Facilities:</b>	15	21,087
<b>Total Production-Related Waste Managed:</b>	26.2 million lbs	29.2 billion lbs
<b>Total On-site and Off-site Disposal or Other Releases:</b>	2.4 million lbs	3.3 billion lbs
<b>Total On-site:</b>	2.1 million lbs	2.8 billion lbs
• Air:	1.9 million lbs	571.1 million lbs
• Water:	205.7 thousand lbs	196.3 million lbs
• Land:	1 lbs	2.1 billion lbs
<b>Total Off-Site:</b>	348.0 thousand lbs	427.5 million lbs

Washington ranks 39 out of 56 states/territories nationwide based on total

**TRI Explorer**

You are here: [EPA Home](#) \* [TRI](#) \* [TRI Explorer](#) \* 2021 TRI Factsheet: State – Washington

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**2021 TRI Factsheet: State – Washington**

Data Source: 2021 National Analysis Dataset (released October 2022)

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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 managed.

**Map of TRI Facilities in Washington**



**Quick Facts for 2021**

	Washington	United States
<b>Number of TRI Facilities:</b>	315	21,087
<b>Total Production-Related Waste Managed:</b>	185.0 million lbs	29.2 billion lbs
<b>Total On-site and Off-site Disposal or Other Releases:</b>	20.9 million lbs	3.3 billion lbs
<b>Total On-site:</b>	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
<b>Total Off-Site:</b>	8.2 million lbs	427.5 million lbs

Washington ranks **39 out of 56** states/territories nationwide based on total releases 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.

**2021 TRI Factsheet: Metropolitan areas - Longview, WA**

Data Source: 2021 National Analysis Dataset (released October 2022)

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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 managed.

**Map of TRI Facilities in Longview, WA**



**Quick Facts for 2021**

	Longview, WA	United States
<b>Number of TRI Facilities:</b>	15	21,087
<b>Total Production-Related Waste Managed:</b>	26.2 million lbs	29.2 billion lbs
<b>Total On-site and Off-site Disposal or Other Releases:</b>	2.4 million lbs	3.3 billion lbs
<b>Total On-site:</b>	2.1 million lbs	2.8 billion lbs
• Air:	1.9 million lbs	571.1 million lbs
• Water:	205.7 thousand lbs	196.3 million lbs
• Land:	1 lbs	2.1 billion lbs
<b>Total Off-site:</b>	348.0 thousand lbs	427.5 million lbs

Longview, WA ranks **155 out of 893** urban areas in the country based on total releases per square mile (Rank 1 = highest release per square mile)

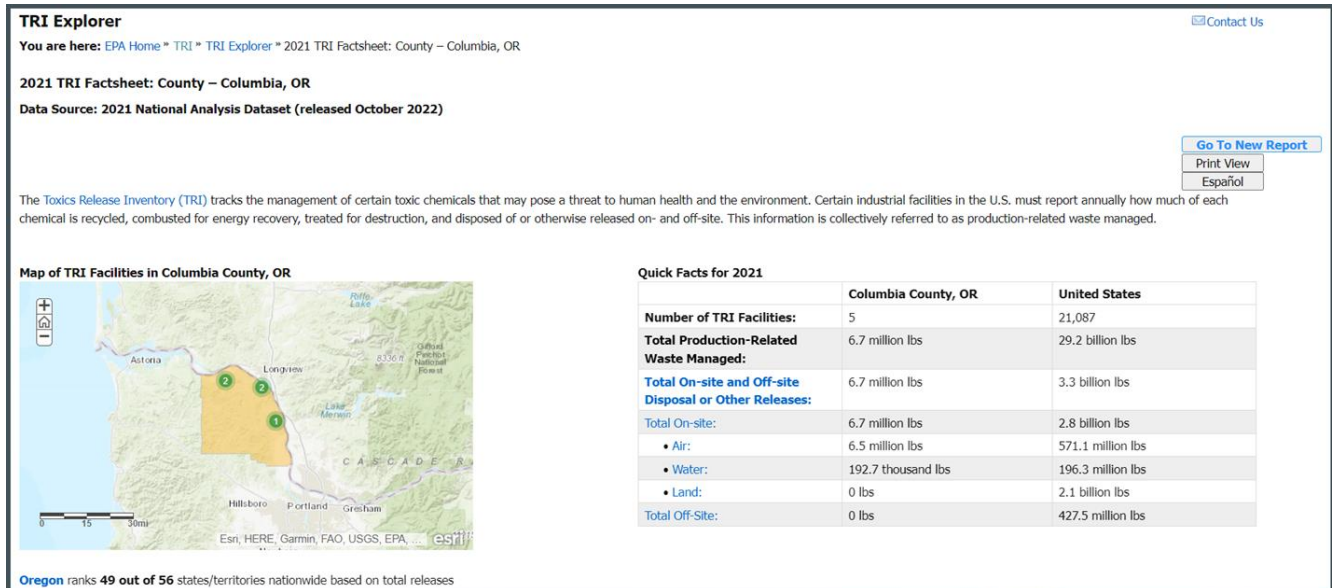
Looking at production-related waste managed over time helps track progress in reducing waste generated and moving toward safer waste management methods. EPA encourages facilities to first eliminate waste at its source (source)

- 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
  - HASA INC 3401 INDUSTRIAL WAY GATE 10 AREA 42, LONGVIEW, WA 98632
  - 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

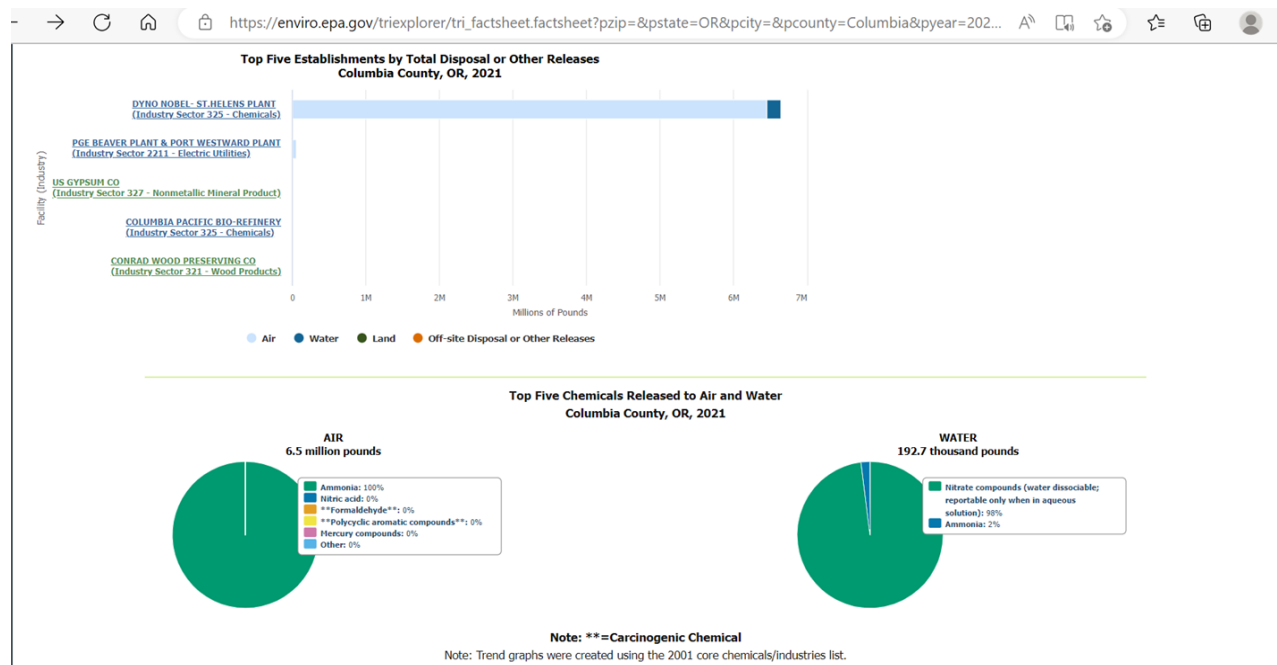
One facility is in Kelso 98626-  
 FOSTER POULTRY FARMS KELSO PLANT 1700 S 13TH AVE, KELSO, WA 98626

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.**

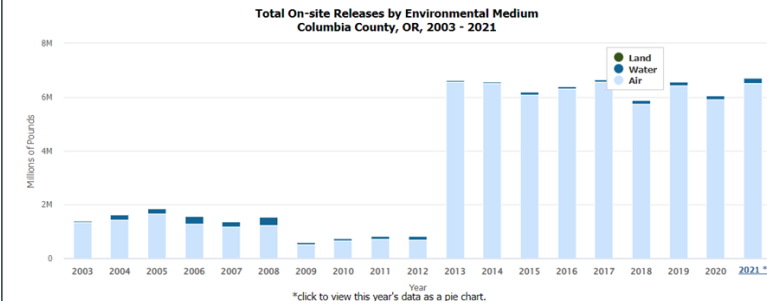


Most of the Columbia County emissions are ammonia, NH<sub>3</sub>, an EPA CAP, released from Dyno Nobel at Deer Island, about 15 miles upstream from Longview-Kelso.



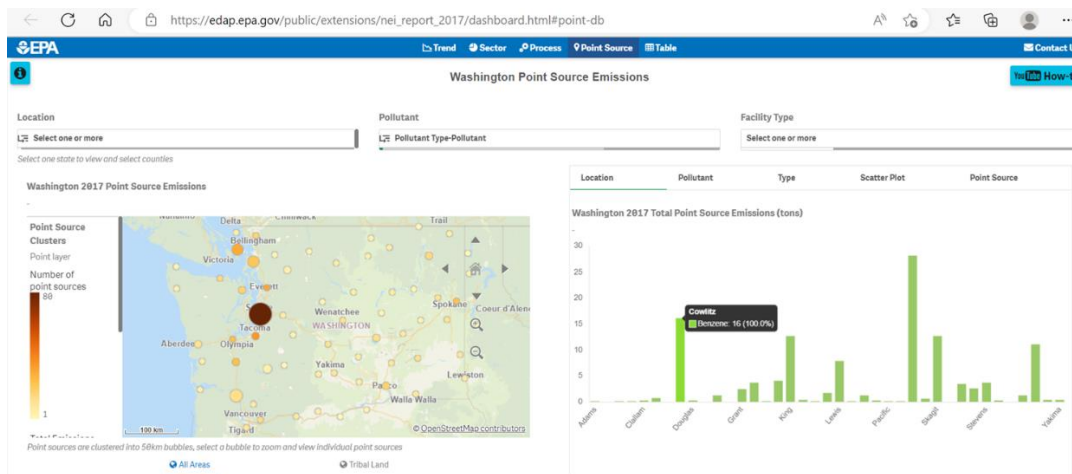
The astronomical increase in emissions began in 2013.

The following charts represent releases of TRI-covered chemicals to the environment in Columbia County, OR. A "release" of a chemical means that it is emitted to the air or water, placed in some type of land disposal, or transferred off-site for disposal or release.

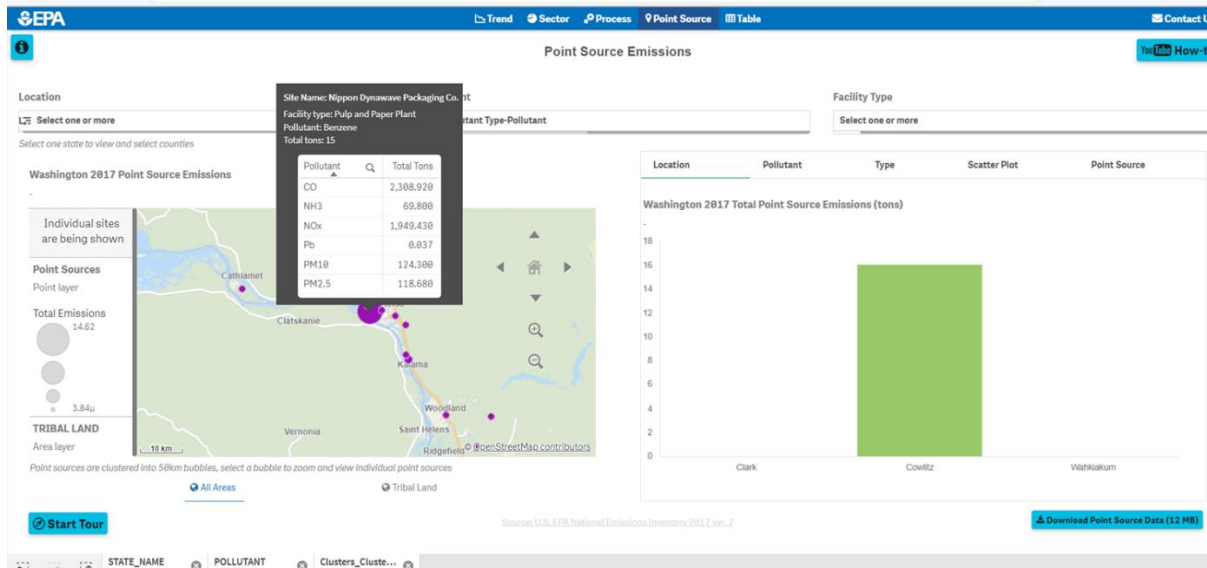


While the air pollution overburdened communities program is focused on criteria air pollutants, hazardous air pollutants can also be indicative and should be included in pollutants affecting communities.

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



Nippon Dynawave is the chief point source.



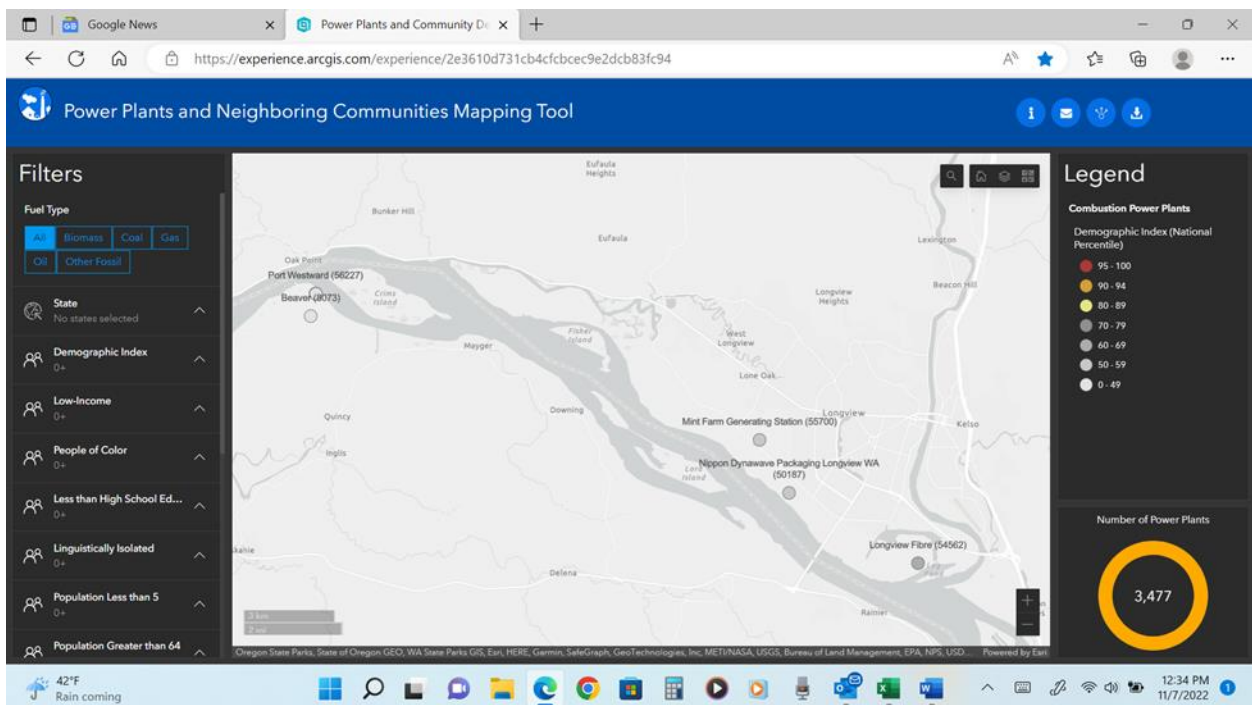


Another is **acetaldehyde**. Cowlitz County emitters rank 1<sup>st</sup>, 2<sup>nd</sup>, and 7<sup>th</sup> in the state.

STATE	STATE FIPS	COUNTY	COUNTY FIPS	FACILITY	ADDRESS	CITY	ZIP CODE	POLLUTANT	POLLUTANT TYPE	EMISSIONS	UNIT OF MEASURE	FACILITY TYPE	NAICS CODE	NAICS DESCRIPTION
WA	53	Cowlitz	53025	Westbank Longview, LLC	300 Fibre Way	Longview	98622	Acetaldehyde	HAP	73424	LB	Pulp and Paper Plant	322130	PAPERBOARD MILLS
WA	53	Cowlitz	53015	North Pacific Paper Company (NORPAC)	3021 Industrial Way	Longview	98622	Acetaldehyde	HAP	64904	LB	Pulp and Paper Plant	322122	NEWSPRINT MILLS
WA	53	King	53033	Seattle-Tacoma Intl	Unknown	Seattle	00000	Acetaldehyde	HAP	49115.18112982	LB	Airport	48811	AIRPORT OPERATIONS
WA	53	Yakima	53077	Yakima Forest Products	251 Medicine Valley Road	White Swan	98952	Acetaldehyde	HAP	30400	LB		321113	SAWMILLS
WA	53	Jefferson	53011	PI Townsend Paper	100 Mill Road	Port Townsend	98368	Acetaldehyde	HAP	26500	LB	Pulp and Paper Plant	322122	PAPER (EXCEPT NEWSPRINT) MILLS
WA	53	Walla Walla	53071	Packaging Corporation of America	31831 W Hwy 12	Walla Walla	99363	Acetaldehyde	HAP	25331	LB	Pulp and Paper Plant	322130	PAPERBOARD MILLS
WA	53	Cowlitz	53015	Nippon Dynawave Packaging Co.	3421 Industrial Way	Longview	98622	Acetaldehyde	HAP	22944	LB	Pulp and Paper Plant	322110	PULP MILLS
WA	53	Lewis	53041	Hampton Lumber Mills/Cowlitz Division - Randle	10186 US Highway 12	Randle	98377	Acetaldehyde	HAP	22090.8	LB	Lumber/Sawmill	321113	SAWMILLS
WA	53	Grays Harbor	53027	Sierra Pacific Industries	301 Hagara Street	Aberdeen	98520	Acetaldehyde	HAP	21004	LB	Lumber/Sawmill	321113	SAWMILLS
WA	53	Skagit	53057	SIERRA PACIFIC INDUSTRIES	14153 McFarland Road	Mount Vernon	98273-8222	Acetaldehyde	HAP	15299	LB	Lumber/Sawmill	321113	SAWMILLS

For **methanol** Cowlitz Co emitters rank 1<sup>st</sup>, 3<sup>rd</sup>, and 7<sup>th</sup> 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 coal-fired 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.

Electricity data browser - Nippon

https://www.eia.gov/electricity/data/browser/#/plant/50187?freq=A&ctype=linechart&ltype=pin&columnchart=ELEC.PLANT.GEN...

Plant name: Nippon Dynawave Packaging Longview WA | Plant code: 50187 | Operator: Nippon Dynawave Packaging Co. | Operator code: 60561  
 State: WA | Sector: Industrial CHP | View in dynamic map viewer

Time-series | Column

2001 2021 | Annual | Quarterly | Monthly

	2018	2019	2020	2021
<b>Fuel consumption quantity</b>				
All primemovers (ALL)				
Bituminous coal (BIT) (tons)	--	--	--	--
Black liquor (BLQ) (tons)	927,338	852,007	797,884	916,851
Distillate fuel oil (DFO) (barrels)	1,040	1,163	472	330
Natural gas (NG) (mcf)	1,906,367	2,722,289	2,965,002	2,793,280
Residual fuel oil (RFO) (barrels)	20,581	8,920	11,750	20,091
Sludge waste (SLW) (tons)	42,386	45,820	47,931	45,602
Subbituminous coal (SUB) (tons)	73,503	78,874	81,938	78,773
Wood/wood waste solids (WDS) (tons)	163,711	164,544	165,789	153,983
<b>Steam turbine (ST)</b>				
Bituminous coal (BIT) (tons)	--	--	--	--
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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 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