

Liz Ellis

To Whom it may concern:

My understanding is that the Federal Air Program does not require testing for some of the odor compounds, for which those of us who live in this area are very familiar. But the rules do require that polluters of our air make a reasonable effort to remedy odors. From my experience living nearby for the last five years, I can report that there are times the wind blows towards the north or northwest that I and my neighbors near Sam Benn Park notice a stinky smell and we often observe a haze in the air emitted from the Cosmo facility. This indicates that the facility has work to do to make a reasonable effort to control odors and pollution.

I am most concerned with the way that sulfur dioxide is or is not captured from Cosmo's recovery stack and its impact on public health. SO₂ causes a range of health effects on our lungs and worsens asthma. Friends have repeatedly called to report smells and blue haze and especially families in Cosmopolis are concerned about the air quality and their children's health.

Apparently, the Recovery Boiler is not subject to the Compliance Assurance Monitoring rule, as promulgated in 1997. The Hogged fuel dryer does not have a control device for sulfur dioxide emissions. Wouldn't additional monitoring of these two sources constitute a reasonable effort to remedy odors and are there added steps Cosi Fibers could and should take to ensure they are a good neighbor and steward?

I understand that Cosmo Fibers voluntarily maintains a number of hydrogen sulfide monitoring stations in South Aberdeen and Cosmopolis, but the data from these isn't included and is not monitored by Ecology. Wouldn't this constitute a reasonable effort to remedy odors and also help the public learn when air conditions are unsafe?

I also noticed that the Department of Ecology maintains an Air Monitoring Network website, with around 50 stations around the state. How about moving the station that's currently located in downtown Aberdeen to a location southwest of the mill? If the station was located in the area where most of the prevailing winds carry the mill emissions, it would be more useful to local residents. This be a reasonable improvement towards helping the public learn when their air is unsafe.

I would like to see the facility install a weather station south, and uphill from the facility, and an effort put forth to record hazardous air pollutant readings from additional primary emissions units.

Some odors may be coming from the wastewater treatment ponds. Is there testing of odor compounds from the ponds? What is tested, and is the data available to the public? Again, if this isn't required by the Federal rules, wouldn't it be a reasonable effort to control odors and pollution?

Sometimes wet hog fuel is burned instead of dry fuel. Wet fuel causes more odors than dry fuel as it burns less efficiently. Please require the mill to burn dry wood only. Clean dry biomass is defined in part 63.7575 as wood with less than 20% moisture.

Because the air permit program is a self-monitoring program, I propose that the Department of Ecology start to make more unannounced visits to monitor air pollution from this facility. This will

really help to improve our confidence in the regulation of the mill's emissions. Please ensure that condition #12 on page 42, which states that the mill must at all time, to the maximum extent practicable, maintain and operate any affected facility in a manner consistent with good air pollution control practice.

Thank you for the opportunity to comment today.

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