## Lee First

My understanding is that the federal air program does not, ooh sorry. My name is Lee First, and I'm the Twin Harbors Waterkeeper. I live in rural Grays Harbor County, out by Markham. 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 year, I can report that every time the wind blows towards the south or the southwest, I notice the smell and often the haze, which is emitted from the Cosmo facility. From my perspective, this indicates that the facility is not making 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. Carbon dioxide causes a range of health effects on our lungs and worsens asthma. I've called in at least twenty times to report the smell and blue haze that I notice, but I'm unconvinced that it makes any difference. I've read the draft Air Operating Permit, and I've read the application for the permit, prepared by the facility. I notice that there are at least 275 sources of emissions that are labeled insignificant emission units. And there are specific emission-and there are specific emission units which are the only ones that are monitored. And yet the Recovery Boiler is not subject to the Compliance Assurance Monitoring rule that was promulgated in 1997. And 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? It seems to me that it would. I noticed that Cosmo 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 substitute 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 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 the prevailing winds carry the mill's emissions, it would be much more useful to us. Wouldn't this be a reasonable effort to help 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. I've been told that some odors coming from the wastewater treatment ponds. I've been told that 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 us? Again, if this isn't required by the Federal rules, wouldn't it be a reasonable effort to control odors and pollution? Lastly, because the air pollution-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. Thank you very much.