

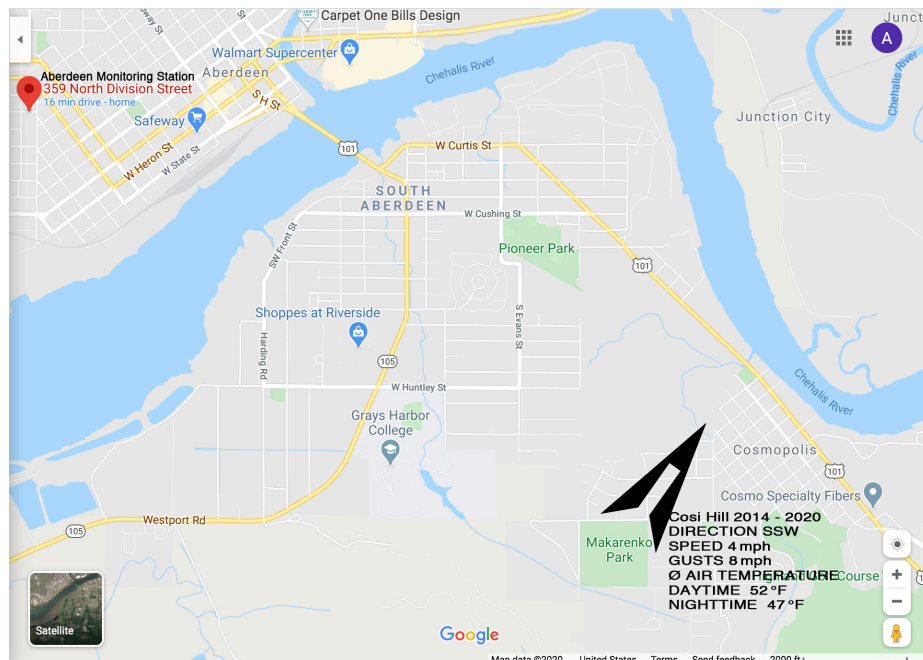
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Subject: Comments Cosmo Specialty Fibers Air Operating Permit 0000809

We appreciate the opportunity to comment on this update and hopefully upgraded air operating permit for the Cosmo plant. We would also like to thank the Department of Ecology for hosting the Public Hearing that was held at the Grays Harbor College on January 29<sup>th</sup> of this year.

As was pointed out at the hearing there is a high level of frustration from the Community about the problems of air and water quality associated with the mill. While this permit does not deal with the NPDES water quality permit, the holding ponds also contribute to the over-all air quality of the area.

Specifically, we all noted that the air monitoring station located in Aberdeen did not faithfully capture the air quality of what was being generated by Cosmo. See the map pasted below for a visual of the relationship of the mill and the station.



Wind source [https://www.windfinder.com/windstatistics/cosmopolis\\_hill](https://www.windfinder.com/windstatistics/cosmopolis_hill)

As shown on the map the mill is considerably southeast location of the monitoring site. The prevailing winds are SSW, so the majority of any plume would bypass the monitor. Odor complaints should be monitored and pinned on the map.

Properly placed monitoring equipment would identify the Cosmo pulp and paper mill's influence on air toxics concentrations and become recordable through a combination of:

- *Spatial analysis* - where a clear spatial gradient in air toxics concentrations would be expected.
- *Temporal analysis* – mill emissions will result in higher concentrations in winter (lower mixing heights and variable wind speeds)
- *Chemical analysis* – distinct “fingerprints” of air toxics will reveal emissions sources (e.g., the mill vs. motor vehicles).

Proper monitoring would allow Daytime Wind Roses (9 am to 5 pm) and would show, not only the predominant wind direction, but indicate directions for time of day and season. Similarly, a Nighttime Wind Rose would provide critical night directional information.

It is noted in the permit description that the plant burns wood and wood waste as part of their electrical and heating generation. Steam produced by the burning of this biomass displaces fossil fuel and is used throughout the mill for heating purposes. The science shows that biomass fuels, including tree-burning, can make climate disruption worse (U.S. Court of Appeals for the DC Circuit in [Center for Biological Diversity](#) v. EPA (D.C. Cir. No. 11-1101)). The court clearly noted that the atmosphere can't tell the difference between fossil fuel carbon dioxide and carbon dioxide emitted by burning trees.

Cosmo is a dissolving wood pulp sulfite mill and as such emits Sulfur Dioxide, Hydrogen Sulfide, Total Reduced Sulfur Compounds, Particulate Matter, Soot, Mercury, Methanol, Volatile Organic Compounds. These items are monitored by the proposed permit, but those same compounds also become available to the surrounding area through fugitive emissions. The cumulative effect of ground water exposure, fugitive emissions, etc. should modify the allowable levels of the air permit to compensate for added but not measured affects.

We hope that the permitting process will recognize and insist that direct monitoring of air is critical in the developing proper quality standards for this or any other facility that requires permitting.

Thank you in advance for your consideration of our comments.

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