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The SSEIS is flawed because its conclusion relies on a speculative assumption. The SSEIS relies on the assumption the NWIW facility will prevent utilization of other more polluting processes, particularly in China. SSEIS 3.5.1.4.

The SSEIS admits its assumption is based on "current" sources of methane. SSEIS 3.5.1.4. An assumption based on current data doesn't account for future development of alternative materials and processes.

Even if the SSEIS assumption has some validity based on today's technological information, there's no way to predict what alternative processes or materials will exist or could be used in the next 10, 20, 30 or 40 years. Yet the NWIW facility, if built, will continue to operate for 40 years, processing and shipping a potentially outdated and polluting product. If methane becomes the most polluting fuel for plastics processing, NWIW could be the facility other entities would be trying to replace. Yet we in Washington would be stuck with it and its significant GHG output.

Additionally, there's no way to reliably predict what some other country or facility might do now or decades into the future. Again, if China or any other country decides not to use methanol, or not to use NWIW methanol, the NWIW facility could continue to operate and continue to be responsible for significant GHG emissions. NWIW views its operation as a financial investment. It won't simply close its facility if other, more environmentally sound materials or processes exist.

The Department of Ecology should not base permit approval on a speculative assumption. The Department of Ecology should deny the NWIW permit.