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2020 09 16 Comment #3

Washington State Department of Ecology  
Olympia, Washington

Re: Formal Comments on Kalama Manufacturing and Marine Export Facility Draft Second Supplemental Environmental Impact Statement, September 2020

Please deny Kalama Manufacturing and Marine Export Facility (KMMEF) a shoreline substantial development and a conditional use permit. The environmental impacts from the project are significant and cannot be mitigated.

Greenhouse gas emissions are insufficiently explained in the draft second supplemental environmental impact statement (SSEIS) and the data contains errors and omissions.

In reviewing 3.7 Significant impacts and mitigation, p. 105, there is the statement, "GHG emissions occurring within Washington State from the sources listed above are estimated to be between 786,117 and 1,421,748 MT CO<sub>2</sub>e per year." This range of in state GHG emissions is patently incorrect.

For on site process emissions alone, current air discharge permit, ADP 16-3204, issued by Southwest Clean Air Agency June 2017, states on p. 3,  
"2.1 Emission Limits

No. 1 Combined greenhouse gas emissions from approved emission units shall not exceed 1,076,000 tons of CO<sub>2</sub>e per calendar year. Annual emissions shall be calculated using procedures consistent with the provisions of 40 CFR 98."

In metric units this is equal to 976,131 metric tons of CO<sub>2</sub>e.

This would be a very minimum NWIW Kalama methanol refinery would emit annually. The technical support document, p. 18, states the facility-wide potential to emit is 1,119,890 tons per year (1,015,947 metric tons). The permit states NWIW agreed to a voluntary limit of less than potential capacity to emit.

The range for in state emissions should begin at no less than 1 million metric tons annually. This alone is a significant increase in Washington state emissions. Adding other in state emissions, including over 250,000 metric tons annually for power purchases, would make KMMEF Kalama methanol refinery one of the top three GHG emitters in the state, excluding TransAlta. Note, this makes data in SSEIS Figure 3-1 also invalid.

When the stated legislative goal in Washington state is to reduce current GHG emissions, there is no rational environmental reasoning to allow shoreline permits for KMMEF Kalama methanol refinery.

Thank you,

Diane L. Dick  
Longview