

# David Hupp

Washington State Department of Ecology:

I testify yet again in opposition to the proposed Northwest Innovation Works (NWIW) Kalama Manufacturing and Marine Export Facility in any form. This is a followup to my previous comments, dated September 19 and October 7, 2020, respectively. This comment again refers to the "Draft Second Supplemental Environmental Impact Statement", Publication 20-06-011, dated September 2020.

I am taking the unusual step of submitting the content of another's comments already submitted to you. My purpose is to make sure you do not miss the vital and essential points Linda Horst is making. She reveals that NWIW is a shell corporation playing a shell game and has taken the trouble to dig out information that Washington State government should have already considered and highlighted. In this I urge what in business is called "due diligence".

Linda Horst has already submitted the following:

Note to Ecology:

Admittedly, the following comment listed below does not critique GHG emissions, displacement or mitigation issues. My comment will, however, address the bona fides, or lack thereof, for Northwest Innovation Works to reliably and fully implement during the next 40 years their commitments contained in the DSSEIS: lowering GHG emissions; displacement of other dirty fuels; and 100% mitigation of all in-state direct/indirect GHG emissions.

The saying "All hat, no cattle" comes to mind when I consider the role of Northwest Innovation Works in their high-stakes, paper shell game they are waging with Ecology in this Draft SSEIS process.

While Ecology has invested considerable time and money researching and analyzing the myriad aspects and ramifications of this proposal, alarmingly zero attention has been devoted to the qualifications of the proponent of this climate/life altering refinery!

It is unconscionable that this upstart company that has never built a methanol refinery, never operated a methanol refinery or ever produced a drop of methanol is, in fact, proposing to build, operate and produce methanol in what would be the largest fracked-gas-to-methanol refinery in the world! Too ludicrous to be true? Tragically it appears not to be too ludicrous for every governmental agency in Washington state that has been tasked with reviewing this proposal for the past 6 years!

How did this meritless company get this far?

NORTHWEST INNOVATIONS WORKS LLC:

- No employees — according to WA Secretary of State, NWIW Kalama LLC has no active license with L & I — no covered employees

- No income — since forming their LLC, zero income from methanol sales
- No assets — business office rented not owned
- No credentials — no documentary evidence
- No experience building a methanol refinery
- No experience operating a methanol refinery
- No EPA approval for the ULE technology proposed to decrease GHG emissions
- No methanol refinery has ever used both ULE and ZLD technology together

They say "The devil is in the detail". The preceding "No —" details are red flags I trust Ecology will not ignore.

There are almost as many red-flag comments submitted against this refinery proposal as red-shirted "No Methanol Refinery" opponents! All of us urge you to deny this permit.

Submitted in support of Linda Horst's concerns,  
David Hupp  
Hood River OR  
October 9, 2020