



January 18, 2024

Ms. Lauren Whybrew
Olympic Region Clean Air Agency (ORCAA)
2940 Limited Lane NW
Olympia, Washington 98502

Via email: lauren.whybrew@orcaa.org

In Re: Notice of Construction Notice #: 23NOC1606

Lauren Whybrew
Reference Notice #: 23NOC1606
2490 Limited Lane NW
Olympia, WA 98502
Email: lauren.whybrew@orcaa.org

Re: Notice of Construction for Pacific Northwest Renewable Energy wood pellet manufacturing facility in Hoquiam, WA (Grays Harbor County)

The undersigned organizations and concerned Cascadians submit these comments strongly opposing the proposed Pacific Northwest Renewable Energy (PNWRE) wood pellet production and storage project. This project will irrevocably harm our climate, communities, and forests. The Notice of Construction Application contains serious errors and omissions, and it does not use the best available science in assessing the air impacts of this project. We urge you to reject the application and undertake your own analysis of all air emissions caused by this project, in order to comply with the Clean Air Act and the Washington State Environmental Policy Act (SEPA).

We are particularly concerned about the unacceptable public health and safety harms that the PNWRE wood pellet project would pose to the port community of Hoquiam. PNWRE's application indicates many serious errors around hazardous air pollutants (HAPs) and volatile organic compounds (VOCs). The application vastly underestimates HAPs: PNWRE claims the facility will emit only 1.3 tons of HAPs per year, while stack tests and air permit applications of similar size and controls show it will emit at least 40 tons of HAPs. The pollutants, which include formaldehyde, acrolein, and methanol, are toxic or can cause cancer, even in small amounts. In particular, they cause health problems for children, the elderly, and people with asthma or COPD.

PNWRE's application also fails to include any controls for volatile organic compounds (VOCs) in its wet hammermills and employs an irrelevant air toxics Ambient Impact Review. Especially as the proposed facility is within a mile and a half of Emerson elementary school, Hoquiam middle school, and Hoquiam high school, this significant deficiency is reason enough to withdraw the application from notice and comment. PNWRE should be required to submit a case-by-case Maximum Achievable Control Technology analysis. For additional information on the facility's application deficiencies, please find attached a letter from Southern Environmental Law Center (SELC) Clean Air Act experts with significant knowledge of wood pellet permits.

Furthermore, wood pellet storage and handling operations at ports create substantial fire and explosion hazards.

Wood pellet piles are prone to spontaneous combustion, and fine wood dust released during pellet production, transportation and handling can "pose catastrophic fire and explosion hazards." Repeated fires and explosions at wood pellet storage silos at ports across the Southeastern US have harmed residents with air pollution from fires

that have burned for days, weeks, or months, and have injured or killed workers. As one of many examples, a fire at a wood pellet storage silo at Port Arthur, Texas burned for 102 days in 2017, sending smoke into the adjacent neighborhoods and causing the hospitalization of many residents.

Another issue of community concern is the amount of noise that PNWRE will create. According to its operational plan, the PNWRE facility will run virtually non-stop: 24 hours a day, 7 days a week, for 52 weeks. This would mean an increase in heavy truck traffic and hammermill pounding nearly every day. Never-ending noise from a pellet mill that operates nearly 24/7 is a health hazard. In communities with existing facilities in the Southeast, even neighborhoods that are several miles away from the plants can hear the steady pounding of heavy machinery stripping and grinding logs. We urge ORCAA to evaluate the potential noise impacts on local communities – including the schools – that would arise from hundreds of additional daily truck trips through small rural communities and the port area.

While expressing concern for the climate and the environment, PNWRE proposes to build an industrial-scale wood pellet production facility – an industry Washington has yet to experience – and ship the pellets overseas to be burned in converted coal-fired power plants. If built, this project will worsen the climate crisis and harm public health at every stage of the wood harvest, truck transport, production, marine vessel transport, and combustion process. The project would increase logging rates in Washington’s forests, both on the Olympic Peninsula and in the Willapa Hills, releasing their stored carbon at a time when we must increase forest protection and forest carbon storage. Significant greenhouse gas emissions and air pollution would be emitted at every step – from cutting forests, trucking cut trees long distances in hundreds of daily trips, chipping wood and producing pellets, shipping pellets overseas to countries in Asia and Europe that currently incentivize woody biomass energy, and burning those pellets in power plants. There is a scientific consensus in the U.S. and internationally that burning wood is not categorically “carbon neutral.” As climate policies catch up with the science, many states and countries are revising their biomass energy policies to reduce or eliminate incentives for wood-burning. If, and when, subsidies disappear, the community will be left with a stranded asset.

Finally, ORCAA cannot rely on the invalid SEPA Determination of Non-Significance (DNS) to meet its own SEPA obligations. The PNWRE DNS review was limited to the immediate environmental impacts of constructing and operating the facility; it is deeply flawed in at least two major respects: (1) it contains serious errors even in its limited calculations with respect to air pollution emissions at the facility, including greenhouse gases, VOCs, and HAPs, and (2) it fails to conduct a lifecycle greenhouse gas analysis of the direct and indirect greenhouse gas impacts of producing, transporting, and burning the wood pellets. ORCAA must deny the NOC Application and conduct its own SEPA review that validly analyzes the significant air pollution caused by this project, including all VOCs, HAPs, and greenhouse gas lifecycle emissions.

Thank you for the opportunity to provide comments in opposition to the proposed project.

Concerned organizations who have signed

350 Bellingham, WA chapter
Jill MacIntyre Witt, Organizer

350 Eugene, OR chapter
Patty Hine, President

350 Salem, OR chapter
Phil Carver

350 Spokane, WA chapter
Fawna Slavik, Co-Chair

350 Tacoma, WA chapter
Stacy Oaks

350 Wenatchee, WA chapter
Jeanne Poirier



350 West Sound Climate Action of Port Orchard, WA
Martha Bishop, Group leader

ActionAid USA
Tristan Quinn-Thibodeau, Senior Policy Campaigner

Alliance for Community Engagement (ACE), South-
west WA
Heidi Cody, Coalition Manager

Audubon Society, Olympic Peninsula chapter
Ken Wiersema, President

Biofuelwatch
Gary Hughes, America Program Coordinator

Bomembond (Netherlands)

Cascadia Climate Action Now
Sally Keely, Founder

Center for Biological Diversity
Dr. Shaye Wolf, Climate Science Director

Citizens for a Clean Harbor
Tammy Domike, Community Organizer

Clackamas Climate Action Coalition
Gail Cordell

Climate Action of Southwest Washington
Alona Steinke

Climate Jobs PDX
Dave King, Co-Chair

Coastal Plain Conservation Group
Andy Wood, Director

Concerned Citizens of Northampton County
Belinda Joyner

De Klimaatcoalitie (Netherlands)
Marloes Spander, founding member

Doctors and Scientists against wood smoke pollution
Dr. Brian Moench, board chair

Dogwood Alliance
Adam Colette, Programs Director

Earth Action, Inc.
Mary Gutierrez

Earth Neighborhood Productions
Karen Ashikeh

Earthjustice
Kristen L. Boyles, NW Managing Attorney

EDSP ECO Foundation (Netherlands)
Jeroen Spander, Founding Member

Environment East Gippsland inc
J. Redwood, Coordinator

Extinction Rebellion, Portland Chapter
Margaret Butler

Federatie tegen Biomassacentrales (Netherlands)

FOGH (Friends of Grays Harbor)
Arthur (R.D.) Grunbaum, President

Friends of Trees committee
Restoring Earth Connection
Lynn Fitz-Hugh, Executive Director

Global Justice Ecology Project
Anne Peterman, Executive Director

Grays Harbor Audubon Society
Janet Strong, President

Green Cove Defense Committee
Eastern Kronenberg, Vice President

Green Snohomish
Don Dillinger, Co-Chair

Great Old Broads for Wilderness, Cascade Volcano
Chapter
Darlene Chiman, Leadership Team member

Kettle Range Conservation Group
Timothy Coleman
La Resistencia
Maruo Mora Villalpando, Founder

Landelijk Netwerk Bossenen Bomenbescherming
(Netherlands)
M. Houpt, Co-founder



Linnton Neighborhood Association
Nancy Hiser

Lower Columbia Stewardship Community
Dave Hale, Treasurer

Mighty Earth
Amanda Hurowitz, Senior Director

Natural Resources Defense Council
Rita Vaughan Frost, Forest Advocate

Northwest Watershed Institute
Peter Bahls, Executive Director

Olympic Climate Action
Helen Amerongen, Secretary

Olympic Forest Coalition
Patricia Jones, Executive Director

Oregon Wild
Lauren Anderson, Climate Forests Program

Our Beautiful Earth
Sheel Patel

Parallax Perspectives
Glen Anderson

Partnership for Policy Integrity
Laura Haight, U.S. Policy Director

Save the Olympic Peninsula
Ronald Richards, Chair

Sierra Club, Washington Chapter
Sept Gernez

SKY Urban Empowerment & Transformation Center
Dr. Linda M. Smith, Pastor and Executive Director

St. Andrew Catholic Church Ecojustice Team
Catherine Bax

SOS Stop Enviva
Michele Hagood, Forest Advocate

Southern Environmental Law Center
Patrick Anderson, Staff Attorney

Twin Harbors Waterkeeper
Lee First, Waterkeeper

Wild Heritage
Cyril Kormos, Executive Director

Wild Orca
Dr. Deborah Giles, Science & Research Director

350 Portland OR, chapter
Brenna Bell, Forest Climate Manager

TCAT Tree Action Group
JJ Lindsey

Friends of the Earth, Malaysia
Mangeswari Sangaralingam

Concerned citizens who have signed:

Caroline O'Brien of Hoquiam, WA
Jude Armstrong of Hoquiam, WA
Rebecca Durr of Aberdeen, WA
Kristin Edmark of Battle Ground, WA
Michael Siptroth of Belfair, WA
Jacqui Brown of Chehalis, WA
Malcolm Cumming of Clinton, WA
Susan Kane of East Wenatchee, WA
Marjorie Fields of Edmonds, WA
Ann Posner of Freeland, WA
Patrick McKee of Mercer Island, WA
Rosemary Moore of Mercer Island, WA
Lisa Riner of Ocean City, WA
Warren Kronenberg of Olympia, WA
Ed Chadd of Port Angeles, WA
Nancy Johnson of Port Angeles, WA
Patricia Milliren of Port Angeles, WA
Ronald Richards of Port Angeles, WA
Sue DeArman of Poulsbo, WA
Barbara Sanborn of Seattle, WA
David Perk of Seattle, WA
Laureen France of Seattle, WA
Dr. Margie Bone of Seattle, WA
Ryan Driscoll of Seattle, WA
Joe Kordzi of Sequim, WA
Sherri Dysart of Shelton, WA
Bonny Headley of Snohomish, WA
Candace Jarrett of Snohomish, WA
Karen Guzak of Snohomish, WA
Jeff Vileta of Snohomish, WA
Debbie Stempf of Spokane, WA



Stacy Oaks of Tulalip, WA
Walter Jorgensen, former council, Tumwater, WA
Pat Freiberg of Vancouver, WA
Peter Fels of Vancouver, WA
Susan Heath of Albany, OR
Mary Fleishman of Bend, OR
Reverend Drew Simrin of Eugene, OR
Stephen Fuller-Rowell of Eugene, OR
Sue Craig of Eugene, OR
John Spahr of Florence, OR
Dr. Ann Turner of Portland, OR
Bonnie McKinlay of Portland, OR
Diane Meisenhelter of Portland, OR
Jacob Apenes of Portland, OR
Jan Zuckerman of Portland, OR
Jennifer Krauel of Portland, OR
John Herbert of Portland, OR
Kathleen Boyland of Portland, OR
Mark Darienzo of Portland, OR
Michael Heumann of Portland, OR

Michaela McCormick of Portland, OR
Kim Davis of Salem, OR
Carol Valentine of Salem, OR
Nadene LeCheminant of Salem, OR
Ray Quisenberry of Salem, OR
Meridian Green of Vancouver, OR
Regna Merritt of OR
Adam Jankauskas of Fitchburg, MA
Denis Melican of Spencer, MA
David Kipnis
Diane L. Dick, Longview, WA
Jim Blake, Hoquiam, WA
Marjorie Fields, Edmonds, WA
Fred Rakevcich, Elma, WA
Rev. Boneta Campbell, Montesano, WA
Kat Schaefer, Montesano, WA
Cecelia Boulais, Oakville, WA
Nancy Mitchell, Oakville, WA
Phyllis Farrell, Olympia, WA

We trust that the voices of the above listed concerned will be carefully considered.

Thank you,

