



Citizens for a
Healthy
Bay

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July 18, 2018

Stephanie Ogle
Washington State Dept. of Ecology
PO Box 47600
Olympia, WA 98504-7600
stephanie.ogle@ecy.wa.gov

Re: Comments on WestRock Tacoma Wood Chip Screening Project State Environmental Policy Act (SEPA) Determination of Non-Significance (DNS) and Notice of Construction (NOC)

Executive Director
Melissa Malott

Dear Ms. Ogle,

Thank you for providing the opportunity to review and comment on the WestRock Tacoma Wood Chip Screening Project SEPA DNS and NOC.

Board of Directors
Brice Boland
Sherrie Duncan
Bryan Flint
Jerry Hallman
Kelly McCord
Sheri Tonn

Citizens for a Healthy Bay (CHB) is a 28-year-old organization whose mission is to represent and engage people in the cleanup, restoration, and protection of Commencement Bay, its surrounding waters and natural habitat. We are a 501(c)3 nonprofit providing practical, solutions-based environmental leadership in the Puget Sound area. We work side-by-side with residents, businesses, and government to prevent and mitigate pollution and to make our community healthier and more vibrant. We have paid close attention to WestRock (formerly Simpson Tacoma Kraft site) since our founding.

Staff and expert members of CHB's Policy and Technical Advisory Committee have reviewed the DNS, NOC and related regulations. We also attended Ecology's public comment hearing on the project. Our comments are outlined below.

Background

WestRock is proposing to update their chip screening system by improving current conveyors and installing new equipment such as screens, belt conveyors and a dust collection cyclone system. The new system will increase chip processing from 2,278 bone dried tons (BDT) per day to 2,369 BDT per day. This increase in productivity will result in the increase in air emissions of Total Suspended Particulates, Particulate Matter (PM₁₀ and PM_{2.5}), Total Reduced Sulfur, Volatile Organic Compounds, and Toxic Air Pollutants.

Increased Air Emissions

WestRock's NOC application, demonstrates that the projected emissions for the chip screening project fall below emissions standards set for New Source Review. Meanwhile, emission increases caused by the project's enhanced productivity downstream from the chip screener are not subject to New Source Review, pursuant WAC 173-400-110. CHB understands that the Department of Ecology (Ecology) is not responsible for setting air emissions standards in our administrative code. However, Ecology is responsible for protecting "Washington's land, air and water for current and future generations."¹ CHB believes that cumulative air emissions must be considered for all projects and project components, not just new or modified sources. CHB requests Ecology use best available science to determine what the cumulative emissions rates will be once this project is complete (i.e., current emissions plus projected emissions), and to demonstrate how this new cumulative rate meets air emissions standards for human health.

WestRock Air Operating Permit

WestRock is currently operating under an outdated air permit that was issued in 2011 and expired in 2016. Ecology's delay in approving WestRock's updated permit creates a barrier to the public for researching and retrieving current and correct information on the mill's operations, in turn, preventing the public from being able to make informed opinions on project proposals such as these. CHB requests Ecology review and approve WestRock's newest operating permit as soon as possible.

SEPA Checklist

Section B, Item 7 "Environmental Health" indicates that there is no known or possible contamination at the site from present or past uses. This response completely neglects to acknowledge that the entire Commencement Bay Nearshore and Tidelands is a Superfund site. Additionally, the proposed project is adjacent to the Simpson Tacoma Kraft contaminated site, and is part of the St. Paul Waterway Problem Area. Contaminants found within the Problem Area included 4-methylphenol, phenol, 2-methoxyphenol, and methylethyl benzene². CHB requests that this information be included in the SEPA Checklist, and that WestRock can demonstrate that their planned excavation will not disturb the sediment cap that functions to sequester these contaminants.

1. Washington Department of Ecology. (n.d.a.). *About us*. Retrieved July 16, 2018, from <https://ecology.wa.gov/About-us>
2. Commencement Bay Nearshore/Tidelands Superfund Site; St. Paul Waterway Problem Area Consent Decree (1991).

Please contact me if there are questions regarding my comments. Thank you for the opportunity to provide feedback on the WestRock Tacoma Wood Chip Screening Project SEPA DNS and NOC.

Sincerely,

A handwritten signature in black ink that reads "Melissa Malott". The signature is written in a cursive, flowing style.

Melissa Malott
Executive Director, Citizens for a Healthy Bay
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