

My name is Erin Dilworth. I am the Policy and Technical Program Manager at Citizens for a Healthy Bay, or CHB. CHB has tracked and commented on US Oil's Shoreline Development permit for this ethanol expansion project, as well as their Spill Contingency and Spill Prevention plans. In our November 2017 comments, we expressed that CHB is opposed to expanding the capacity and infrastructure for fossil fuels in the Tacoma Tideflats.

The Notice of Construction Worksheet #11547 for this project states that this proposed project will increase ethanol deliveries to the refinery by 3,616,600 barrels per year. The NOC then goes on to state that all 3,616,600 barrels will be loaded onto marine vessels. Then later, the document states, "Ethanol is not being produced, nor are ethanol vapors being combusted at the facility as a fuel gas or as part of the fuel gas production in the refinery." We have to assume this means that all 3,616,600 barrels are being exported outside of Tacoma. Please confirm if this is an accurate assumption.

The City of Tacoma's SEPA documentation for this project touts that greenhouse gas emissions from ethanol are 43% lower than those of gasoline. While this may be true, if the ethanol is getting exported, Tacoma will not see any of the environmental benefits of this project. Tacoma will receive, however, the increase in rail car traffic, increase in fire hazards, and increase in both Toxic and Hazardous Air Pollutants.

What are the benefits to Tacoma? Will this project create new jobs for Tacoma residents? If so, how many?

The Puget Sound Clean Air Agency is tasked with determining if this increase in Toxic and Hazardous Air Pollutants is detrimental to human health. Their analysis has shown that the proposed emissions from this project alone do not exceed any standards. However, what would the analysis look like if the Clean Air Agency was required to assess what the cumulative air quality impact looks like – when you

consider both proposed and current air emissions from US Oil? What about from all industries in the Tideflats together? Would this project still be compliant?

We understand that State and Federal codes do not require the Clean Air Agency to consider cumulative impacts when there are new or modified sources of emissions. However, the Clean Air Agency is not prohibited from considering cumulative impacts in developing and approving this application, and can, in their discretion, do so.

Air emissions are a major public health concern in Pierce County. Residents, depending on where they live, face huge health disparities - life expectancy rates in some areas are 28 years below that of our longest-lived neighbors.

The Puget Sound Clean Air Agency's mission is to "protect public health, improve neighborhood air quality, and reduce our region's contribution to climate change." If the Clean Air Agency is serious about its mission, they will tally the current emissions plus the projected emissions from this project and demonstrate that the new emissions total does not exceed air quality standards set to protect human health.

Lastly, I'd like the Clean Air Agency to in the future, consider including informational sessions as part of their public comment hearings. The very technical information presented in this NOC is difficult to comprehend, at best. I get paid to read these documents and attend these hearings. The members of this community who participate in these comment hearings deserve more time with Clean Air Agency staff, so they can meaningfully participate in these processes and provide informed, effective comments.

Thank you for taking the time to hear my concerns, and I am happy to discuss them with you at any time.