

Washington State Department of Ecology

Response to Comments

Notice of Construction Order 16293 and SEPA DNS

Port Townsend Paper Corporation

Public comment period: May 22 – June 28, 2019

This document addresses questions and comments received by the Department of Ecology (Ecology) during the public comment period for the draft air quality Notice of Construction (NOC) Order 16293 and the associated State Environmental Policy Act (SEPA) Determination of Nonsignificance that would allow Port Townsend Paper Corporation (PTPC) to replace its Old Corrugated Container (OCC) batch pulper with a new continuous pulper. The project is referred to as the OCC Pulper Upgrade Project.

We published notice of an opportunity to comment in the Port Townsend Leader on May 22, 2019 and on the Ecology website. In the notice, we invited public review of the documents, provided a 38-day public comment period, and provided notice of a public hearing to accept oral comments. A public meeting followed by a formal hearing was held on June 25, 2019. We received 43 comments from individuals and organizations during the comment period.

Ecology carefully reviewed all the comments received. During the review, Ecology considered whether the comments provided any new facts relevant to the project or identified any areas where the proposed NOC had neglected or misapplied an applicable requirement found in rule or law. We have included all of the comments received in this document. Changes were made to the Order, where necessary. The changes are described in the response to the appropriate comment. A copy of the final NOC order will be sent to all interested parties upon issuance and posted on the Industrial Section website at <https://fortress.wa.gov/ecy/industrial/UIPermit/NOCPermits.aspx>.

Ecology received many comments with common concerns. In order to provide clear responses that are easily accessed, Ecology has responded to these common concerns in a single location at the beginning of this response under the heading of “Ecology Responses to Common Comments and Concerns.” The second part of the response, under the heading “Public Comments Received,” includes all of the comments received, followed by Ecology’s response. Comments appear in italicized text, followed by Ecology’s response in regular text. Ecology will send a copy of this response to comments to each individual who provided comments and those who attended the public meeting/hearing.

ECOLOGY RESPONSES TO COMMON COMMENTS AND CONCERNS

Increase in Odors

A number of comments expressed concerns about the potential for increases in odors associated with the proposed project. Port Townsend Paper Corporation (PTPC) uses two processes to produce pulp: kraft and mechanical. The kraft process uses sulfurous chemicals to break down wood chips into pulp. This process produces emissions of sulfurous compounds with very low odor thresholds, which means that they are able to be detected at low concentrations. The mechanical process produces pulp by recycling cardboard. The cardboard is combined with water in a pulper to produce this pulp. The process does not use sulfurous chemicals like the kraft process and, therefore, does not produce the sulfurous kraft mill odor. This project will allow PTPC to increase their production capacity of pulp from the recycling of cardboard only, there will be no increases in production capacity of kraft pulp.

Noise

Some commenters expressed concerns about potential increases in noise from the facility associated with the project. In the State Environmental Policy Act (SEPA) checklist, PTPC has stated that the installation of the continuous pulper will not lead to additional noise.

The following resource provides additional information regarding noise pollution:

<https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Noise-pollution/Noise-pollution-FAQ-for-citizens>.

Ecology does not have the authority to enforce noise rules or local noise ordinances. Jefferson County has the authority to enforce noise rules and should be contacted with any concerns.

Water Usage

Some of the comments included concerns about the overall water usage at the mill and questioned whether the project would result in an increase demand for water. The SEPA checklist, provided to Ecology by PTPC, states that the new continuous OCC pulper will use 260 gallons per minute (gpm) compared to 270 gpm for the old batch pulper. Additionally, at the public hearing, Kevin Scott (PTPC Mill Manager) stated that the OCC pulper upgrade project will lead to a 0.5 million gallon per day decrease in water usage. This is most likely at cumulative value from overall efficiencies realized at the plant. The project is not expected to increase the water demand for the facility and will result in some amount of reduction in water usage.

Regulatory Compliance History

Ecology's expectation is that a facility be in compliance at all times. Although PTPC has had non-compliant events, PTPC has made good faith efforts to maintain compliance and takes corrective actions as soon as practicable to correct any noncompliant events. Given the size of the facility and the complexity of the environmental regulations, occasional noncompliant events are not unexpected and the historical compliance history of PTPC is similar to other industrial facilities in the state.

Toxic Trespass and Air Contaminant Evaluation

Some of the comments included concerns about the toxic emission from the project and the environmental evaluation process. The OCC Pulper Upgrade Project was evaluated using the process described in the Washington Administrative Code (WAC) for evaluating the air quality impacts of new construction or modifications at a facility. The emissions from the project were quantified and reviewed. The toxic emissions from the project underwent “First Tier Review” in accordance with WAC 173-460-080. The review showed that the emissions from the project were safe for human health and the environment.

GHG Emissions

Some of the comments included concerns about the emission of greenhouse gases (GHGs) from the project. This project will not require any additional steam capacity from the mill. Steam production (burning of fossil fuels and biomass) is the primary source of direct GHG emissions from the mill. This project will increase the pulp produced from the recycling of cardboard. There is a minor increase in GHG emissions from the additional transportation of the cardboard and pulp produced which does not rise to the level of significance that would lead to an Ecology review.

Truck Traffic

PTPC stated in the SEPA checklist that approximately 4 additional trucks per day will be required for the production increase. When evaluating the impact of emissions, Ecology uses maximum capacity to determine emissions. The actual projected production levels of projects may be lower. The 4 additional trucks per day is an estimate based on projected actual production from the OCC pulper. If the upgraded OCC pulper operates a full capacity, an estimated 8 additional trucks per day would be required for the production increase. This increase in truck traffic would not affect the SEPA determination.

Product from PTPC is shipped by both barge and truck. Paper Machine 2 (PM2) uses a mix of pulp from OCC and the kraft pulp mill. Paper from PM2 is sent off site by truck. Increasing the amount of OCC pulp to PM2 will allow for more kraft pulp to be diverted to Paper Machine 1 (PM1). Paper from PM1 is sent off site by barge therefore only a portion of the increase in pulp from the upgrade project will be sent off site by truck. There is no expected increase in number of barge shipments.

No Increase in Pollution/Deny the Project

Ecology’s mission is to protect and preserve Washington’s land, air, and water for current and future generations. Ecology does this through the implementation of environmental regulations. Washington’s air quality regulations allow facilities to propose new sources of air pollution or modifications to their existing sources that will result in an increase in air pollution. WAC 173-400-111 specifies how Ecology must review and either approve or deny such proposals. Additionally, a SEPA review must also be conducted to ensure that the project will not result in significant adverse environmental impacts. Ecology has followed the procedures for each process and determined that the project meets the applicable air quality regulations and will not result in significant adverse environmental impacts.

PUBLIC COMMENTS RECEIVED

1. Comment from Faith Morgan

This mill has not been a good neighbor. Any increase in productivity would mean increase in odor, which is already making life miserable for many. The owner has not addressed the smell or the noise issues. They need to close..

Response to Faith Morgan

Please refer to the responses Ecology has provided above regarding “Increase in Odors” and “Noise.”

2. Comment from Robert Dickey

The air we breathe should not be contaminated with toxic pollution. This mill pollutes and emits toxic waste in to the air we breathe.

Since George Bush started the clean air act the mill in Port Townsend became self regulating and the EPA has no power or say so.

This administration is even worse. I have lived here for 29 years and we never had odor from the mill in Port Hadlock until the clean air act was signed in.

This is total BS. I have suffered from Asthma, Burning eyes etc because orphans this mill.

Now they want to pollute more and use more water now that we are in drought conditions. This is insane. Time to close this toxic nightmare.

All about profit for the shareholders at the expensive of poisoning us with toxic emissions.

Response to Robert Dickey

Please refer to the responses Ecology has provided above regarding “Water Usage” and “Toxic Trespass and Air Contaminant Review.”

3. Comment from Mary Missig

I would like to know more about the environmental impact of the new equipment that the mill is planning.

Response to Mary Missig

Comment noted. Ecology followed up with commenter’s request on June 17, 2019 via email (see below).

“Good afternoon Mary,

We received a comment which requested more information regarding the environmental impact of the new equipment that PTPC is proposing to install. Information regarding the environmental impacts of the project can be found on the Ecology website and can be accessed here:

<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Industrial-facilities-permits/Port-Townsend-Paper>

If you have specific questions I am more than happy to answer them.

Here is a short summary of the project:

PTPC makes two kinds of pulp on their site. They make pulp from wood chips and pulp from repulping recycled cardboard. The wood chip process uses chemicals to breakdown the wood chips into pulp. The recycled cardboard process uses water to blend the cardboard into pulp.

- 1) PTPC is looking to upgrade the recycled cardboard portion of their mill so that they can increase production of pulp from recycled cardboard.
- 2) The pulp made from recycled cardboard will go from 480 tons per day to 720 tons per day.
- 3) There will be approximately 4 additional trucks entering the site per day to deliver the extra cardboard needed to make the pulp.
- 4) The new recycled cardboard pulper is more efficient than the old pulper and will need less water. So there will be a decrease in water used.
- 5) Because this is not part of the chemical pulping process there should be no increase in odors.

There will be minor increases in certain pollutants. Ecology analyzed the amount and the effect of these pollutants. The amount was low enough that Ecology believes this project is safe for human health and the environment. I will reiterate that this project will allow for an increase in the pulping of recycled cardboard and not the chemical pulping of wood.”

4. Comment from Karen Sullivan

Thank you for the opportunity to comment on the proposed increase in hazardous air and water pollutants as a result of upgrading the pulping equipment at the Port Townsend Paper Mill (PTPM). The Department of Ecology (DOE) predicts this will impact our already damaged air quality by increasing volatile organic compounds by 0.8 tons per year, ozone depleting substances by 0.8 tons per year, and toxic air pollutants by 0.4 tons per year. Section 112(b) of the federal Clean Air Act defines hazardous air pollutants such as these as “...those pollutants that cause or may cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental and ecological effects.”

While DOE states in its outreach materials “As long as all applicable requirements are met, these increases are allowed under air quality laws,” the current regulations do not require that emitters report all chemicals they emit, nor do they address all of them. As an example, in one of the supporting documents, the statement “I am not sure if chloroform would need to be tested for” is a cause of concern.

Further, the Toxic Release Inventory database from which permitting decisions are made does not represent actual measured concentrations; rather, it allows industry to self-report using estimates, not actual measurements, and therefore, the State Department of Health (DOH) admits “...the accuracy [and toxicity] of these emissions is not known,” and “the rules and definitions for reporting change from year to year.”

I also dispute that the PTPM meets, or has a history of meeting, even the existing requirements. To wit: In August 2018, PTPM was fined \$4,500 by the State for the amount of carbon monoxide it emitted into the air in November 2017. In 2017, the PTPM was fined \$30,000 by the State for two noncompliance incidents in 2016. PTPM has a history of noncompliance. In fact, going back all the way to an October 1986 report by EPA titled “NEIC Potential Noncompliance Profile Region X,” Port Townsend Paper was listed as a “Significant Violator in Air” and separately as a “Significant Non-Complier in Water.” With 601,256 tons of CO2 “equivalents” emitted in 2017, PTPM continues to maintain its rank as 25th among Washington State’s worst greenhouse gas emitters. The mill’s intentions were called into question during a recent and particularly severe drought, when residents of surrounding areas were on the verge of water rationing while the mill refused to reduce its use of water. We remember that, and question now whether the increased production capacity will lead to an increase in water use despite the coming renegotiation with the City, of the use agreement. A good citizen does not harm his neighbors.

Increasing the mill’s pulp production capacity by 150% from 480 to 720 oven-dried tons of pulp per day and calling it compliant seems to suggest either that the requirements themselves are unreliable and deficient, or that the otherwise clean air of Jefferson County has plenty of “fill room” by toxic pollutants before thresholds of noncompliance are triggered. Thresholds of health effects are already being triggered—where is the analysis of existing and potential health effects? I could not find it. The DOE’s State Environmental Policy Act Determination of Insignificance contains not one shred of justification.

In fact, case law and Washington State law (WACs 173-400-040, 405-040 and 401-630) preclude toxic trespass, which is defined as the presence of environmental contaminants beyond the boundaries of an emitter’s property onto a person’s property, or in their water supply, or even in their bloodstream. Toxic pollutants enter our bloodstreams when we breathe the mill’s effluent. State law precludes the crossing of private boundaries by contaminants; in particular, odors, particulates, dust, and haze that are “detrimental to the health, safety or welfare of any person, or that may “interfere with use and enjoyment of property or cause damage to business or property;” all are prohibited.

In 2008 the Washington State Department of Health prepared a report at the request of residents of Port Townsend and Jefferson County. Admitting that the issues are complex and not easy to address, and also that no records of specific health evaluations existed, the DOH stated that it would be necessary to “clearly identify the contaminants of concern, measure the exposure, and demonstrate a complete exposure pathway.” DOH concluded, “All the information necessary to conduct a health study is not available to assess the possible health effects associated with air emissions from PTP mill.” Does “not available” mean the mill does not release this information, or the State does not analyze it? Either would be egregious.

If the mill has not made the needed information available, and if the State has not assessed the impacts, and since multiple complaints are being made nearly every day, about health and welfare effects, interference with normal activities, prevention of enjoyment of property, and the extra expense of home air filters in order to merely breathe normally, then how are these increases in toxic pollutants morally, ethically, or legally justified?

It is not enough to say the new equipment will be more efficient, because a 150% increase in the mill's pulp capacity, along with the inevitable aging of such equipment, guarantees further deterioration of our air and magnified health impacts. I strongly object to any increase in capacity until current air and water contamination issues are addressed.

Response to Karen Sullivan

Please refer to the responses Ecology has provided regarding “Water Usage”, “Regulatory Compliance History”, and “Toxic Trespass and Air Contaminant Review.”

Emissions from the mill are reported on a monthly and annual basis as required by their Air Operating Permit (AOP), WAC 173-400-105, and WAC 173-405-072. The mill is also required to report the release of toxics to the environment through the federal Toxics Release Inventory (TRI) program. However, the TRI data is not the basis for permitting decisions. In accordance with Ecology's air quality regulations, including the requirements associated with toxic air pollutants (TAPs), new or modified sources are evaluated based on the project specific emissions. Projected emission increases are provided in the NOC permit application and reviewed by Ecology staff. Projects are determined to be protective of the environment and human health if they are below established thresholds specified within our rules and they have applied any reasonably available control technology.

With respect to emissions from the facility overall, there are additional requirements associated with the emissions of hazardous air pollutants. EPA has established National Emission Standards for Hazardous Air Pollutants (NESHAPs). These establish emission limits for specific pollutants and processes. PTPC is subject to four different NESHAPs. These standards are reviewed periodically to determine if, after promulgation, there exists “residual risk” to the community from the source. EPA has performed this review of residual risk for kraft mills and has updated the requirements, when determined to be necessary.

There has been additional work associated with the Washington State Department of Health's health assessment. As part of that effort, the Agency for Toxic Substances and Disease Registry (ATSDR) performed air monitoring during the fall of 2018 to assess ambient air quality. The results of this monitoring study are pending.

5. Comment from Jesse Hoffman

Approximately 2 months ago I moved to Port Townsend with my wife and 7 year old daughter. After traveling the western US last summer we determined this area to be the most attractive option for setting down our roots due to its gorgeous scenery, proximity to both sea and mountains, thriving arts scene, strong sense of community, and relative safety in respect to crime. In March, we took a trip to find a rental and were fortunate to find a home in the proximity of Kah Tai Lagoon.

Shortly after signing our lease, I was driving out of town and was overtaken by the emissions. I immediately became nauseous. My nose and eyes burned. My face became puffy. I had residual stomach upset and symptoms for several hours after brief exposure.

This caused me to urgently research paper mill emissions and the precise impact of the PT Paper Mill, which was difficult to determine due to lack of comprehensive data.

Our family has taken significant steps to limit our exposure to toxic substances including eating organic, purchasing beds without neurotoxic fire retardants, and avoiding containers and toys with endocrine disrupting chemicals. None of these steps are extreme given the significant scientific evidence to support them, and now we find ourselves facing another threat that is not so straightforward to mitigate, air pollution. In fact, one of the reasons we moved to a small and isolated town was to avoid this very threat.

In a May 2nd article in Mother Jones titled "Researchers Now Have Even More Proof That Air Pollution Can Cause Dementia" a scientific researcher Caleb Finch, leader of USC's Air Pollution and Brain Disease research network stated, "I have no hesitation whatsoever to say that air pollution causes dementia. Air pollution is just as bad as cigarette smoke." He went on to specifically mention nitrogen dioxide, a known pollutant emitted by the PT Paper Mill.

In a conference research paper abstract titled "Health Effects and Environmental Injustice of Communities Surrounding Pulp and Paper Mills" the abstract states, "Communities surrounding pulp and paper mills are constantly exposed to emissions of foul odors and criteria and hazardous air pollutants (HAPs and CAPs). The characteristic odor of a pulp mill is a result of total reduced sulfur (TRS) emissions, which are irritants and potential neurotoxins. Odorous emissions alone can also cause health symptoms. The U.S. Agency for Toxic Substances and Disease Registry (ATSDR) states that, Mucous membranes, upper and lower respiratory airways, heart and blood vessels, stomach and intestines, brain, psychological, and general well-being can be affected by odor. They have also confirmed that, Environmental odors that are irritating to the lower respiratory tract can exacerbate asthma episodes. Health effects of inhalation of CAPs and HAPs include irritation of the respiratory tract, vomiting, central nervous system effects, increased risk of developing cancer, coma and death. There is an obvious discrepancy of the standard of living between the communities living close to the fence line of mills and those living several miles away. The poverty level is often higher closer to mills and the property values are lower. Property damage continues as acidic emissions from the facilities corrode metal and deteriorate paint and stone. Moreover, many pulp mill communities are socio-economically segregated, with poor residents living near the fence line, while wealthy residents live further away."

Moreover, the WHO reports that an estimated 4.2 million premature deaths globally are linked to ambient air pollution, mainly from heart disease, stroke, chronic obstructive pulmonary disease, lung cancer, and acute respiratory infections in children. Sovereignty over one's body and freedom from toxic exposure is a basic human right. No person should be denied the option to remain unpolluted by industrial emissions and waste, particularly not children who have no choice where they live. In particular, no one should live in ignorance of all the chemicals they are being exposed to. This is supported by laws against toxic trespass, not to mention basic morality.

Further, though preliminary data has largely been determined inconclusive as pertains to Jefferson County reporting of diseases like respiratory illness and cancer at higher rates than other areas of the state, it must be considered that with exception to mill emission exposure, this county is largely rural and therefore relatively free of other contributing factors that would be present in urban environments. It must also be considered that Port Townsend's population of 9,551 is less than 1/3 of the population of Jefferson county. We demand a more comprehensive study that can accurately weigh the threat.

Since this initial exposure, we have awakened to mill smell on 15-25 occasions with the emissions passing through transiently during the day and evenings. We have spent hundreds of dollars on air purifiers we keep on at night. On bad days, we cannot walk our daughter to school, which is closer to the mill and therefore suffers from greater exposure. We hide inside. Enjoying our beautiful town is not an option until the air clears.

The kids in Salish Coast Elementary are regularly saturated in these emissions. It is no secret that the chemicals the mill is known to emit have health consequences, and yet there are potentially many other chemicals that are not even monitored. We demand thorough and comprehensive monitoring of emissions.

Some may suggest we should not have moved to Port Townsend if we didn't like the mill. Firstly, we did not understand the impact. Secondly, we signed our lease before experiencing the worst of it. To conclude that people who don't want exposure shouldn't live here is to a) be utterly neglectful of children's health since they have no power of determination over where they live and b) to put industry and economy before the health and wellness of citizens and the environment.

This town and its water should not be held hostage by a company whose owners are distanced from the threat and inconvenience. Port Townsend is a progressive community with a large number of citizens who would take great pride in making our town an example of environmental stewardship and innovation, and while recycling plays an important role in such stewardship, it should be done in such a way that health and environmental impacts are minimized at every stage of the process. This includes ensuring facilities are located away from populated areas.

The mill could also run on 100% renewables utilizing technologies like tidal energy. It could be a research opportunity for alternative pulping methods utilizing enzymes to break down the pulp. In respect to first-use paper, the mill could process hemp fibers that have less lignan and therefore require less processing since the passage of the Farm Bill has eased restrictions on growing hemp fiber. With the help of state and university investment, Port Townsend could offer an example for how we can convert industrial processes to confront the pressing challenges presented by climate change. Instead, PT Paper Mill is one of the top greenhouse gas emitters in Washington State.

The positioning of the mill is also of great concern. It is a stone's throw from the city limits. The southern end of the town is up on a hill rendering the smokestacks ineffective at dispersing emissions above the population when the wind shifts.

This is also evidenced by frequent reports from the uptown area which, while over a mile away, detects the mill smell as often or more often than my location closer to the mill.

Most often when I bring this issue up, people show concern but seem hesitant to fully acknowledge the threat simply because they don't want to live in fear. They don't want to carry guilt that they may be exposing their families to chemicals that could shorten or reduce their quality of life. It is simply too much to confront on top of their day-to-day challenges, and Port Townsend is otherwise a wonderful community. It is therefore critical that the stakeholders in the mill and community acknowledge that those who are outspoken about the mill's impact are just a small fraction of those who have experienced significant disruption of their lives and subsequent health impacts.

To summarize, I would like to refer to the comment offered by Karen Sullivan who, having addressed this issue much longer than myself, eloquently outlined additional legal and ethical reasons the mill should not be allowed to increase emissions. I would also like to request a public hearing on this matter.

Response to Jesse Hoffman

The majority of the concerns brought up in this comment (total emissions of toxic and odorous pollutants from the mill, total greenhouse gas emissions from the mill, control of the water system, source material for the pulp and papermaking process, and location of the mill) are outside the scope of this permitting action. Some of them are outside of Ecology's regulatory authority, as well. With respect to the potential increase of emissions associated with the proposed project, this project was reviewed in accordance with the applicable air quality regulations specified by WAC 173-400-111 (Processing notice of construction application for sources, stationary sources and portable sources) and WAC 173-460 (Controls for new sources of toxic air pollutants). Please refer to the responses Ecology has provided regarding "Toxic Trespass and Air Contaminant Review" for more information on how toxic emissions were evaluated for the proposed project.

Please refer to the response Ecology has provided to Comment #4 for responses to Karen Sullivan's comments. The opportunity for comment was provided to the public with regards to the proposed OCC pulper upgrade project.

6. Comment from Seth Weathers

We have 135 months, 11.25 years, until we reach the point of no return for pollution of green house gasses. This is completely unacceptable to do for our peninsula, let alone our world. We need to cease paper manufacturing in general and start producing hemp paper, wood and general hemp products. This is not right. And it should be banned. .8 ton per year is a massive increase to what is already produced from this nasty mill. And as someone whom is 26 and will be inheriting the world from you older generations. I am completely outraged and disgusted. Disappointed and angry. Do not let this happen. Do your research into how bad this will effect our environment and our world. I do not even want to have kids because of the older generation. This is disgusting!

Response to Seth Weathers

Ecology's air quality regulations prescribe how proposed increases in emissions are to be evaluated (WAC 173-400-111 and WAC 173-460). The "Findings" Section in the proposed NOC provides details on how the project was evaluated in accordance with those regulations. Please refer to the responses Ecology has provided above regarding "Toxic Trespass and Air Contaminant Review", "GHG emissions," and "No Increase in Pollution/Deny the Project" for additional information.

7. Comment from Crystal Vergin

I am concerned with the mill being properly monitored and ensuring air quality and safety for its employees and town residents, regardless of new machinery.

Response to Crystal Vergin

The permitting process for projects like the OCC Pulper Upgrade Project have been developed to ensure that the actions of the mill are being appropriately assessed for the protection of the environment and human health. Following an Ecology review of NOC Order 16293, the order has been updated to include an additional requirement for the reporting of OCC pulp production.

8. Comment from Barbara Mac Alpine

I strongly APPROVE the expansion of the PT Paper mill. The mill has provided economic stability for the East Jefferson County since 1929, they have modernized their operations repeatedly and are responsible for keeping Port Townsend from becoming a ghost town during the Great Depression and well into the 1960's.

It provides good living wages for a significant portion of our community.

Response to Barbara Mac Alpine

Comment noted.

9. Comment from Arthur Fine Fine

A machine that operates continuously will make noise every day, all day and all night, But I have not seen any data on the level of noise that it will produce.

The current mill machinery is already loud and frequently a noise nuisance and hazard. It would be appropriate to have information about current decibel levels produced by the mill in various locations, and to contrast that with verifiable estimates of the levels expected if the new pulping machinery were running as anticipated.

Odors are not the only environmental hazard of the mill. Sound (noise) is certainly another that needs to be quantified and controlled.

I would like to have a public meeting where the noise problems raised by the mill can be addressed.

Response to Arthur Fine Fine

Please refer to the response Ecology has provided above regarding “Noise.”

10. Comment from James Scarantino

First, I want to compliment the Port Townsend mill on the good work they have done over the past several years reducing odors from their operations. I hardly notice any odors now. The most pronounced offensive odor in that area comes from the marijuana operations. I ride the Larry Scott Trail past the mill and really can't smell anything from the mill. When I can detect an odor that may be from the mill--and not the pot processors--it is very faint and not unpleasant. I think their plans to increase capacity is a terrific benefit for this community and hope nothing stands in their way. The minimal additional truck traffic is far less than we see from events in Port Townsend. I really see nothing objectionable about their proposal.

Response to James Scarantino

Comment noted.

11. Comment from Lisa Crosby

Will there be an assessment to potential increase in noise level with the addition of a new paper pulper? Unfortunately I have become quite sensitive to low frequency noise as I have gotten older, and I can hear the Mill almost all the time (I live in Uptown) and particularly at night. I don't like the sound of the Mill being a persistent backdrop to my life so sometimes I consider moving. I have no way of telling whether the noise from the Mill has increased over the years since I don't have a measuring device other than my ears. I do know there was a temporary increase in noise level in 2017 following the addition of new machinery and this noise was abated, but I am not certain whether or not the sound was decreased to the pre-installation level. I consider noise to be a significant environmental matter and hope this will be considered in the permitting process.

Response to Lisa Crosby

Please refer to the response Ecology has provided above regarding “Noise.”

12. Comment from Douglas Chartier

I am deeply concerned that PTPC (Port Townsend Paper Co.) is chasing further profits at the expense of the residents of PT (Port Townsend.) In all the stated interactions Have read PTPC has NOT addressed serious issues which affect all PT residents. i.e.

There is NO reference to the smell emanating from the waste ponds at the mill, This smell is already negatively affecting residents of the area from Point Hudson to Marrowstone Island and Cape Geoge Colony. Any additional pulping operations necessarily will increase the amount of waste materials sent to the ponds and therefore an increase in the smell.

There is no reference to the additional truck traffic which will result from an increase in production. This traffic increase also increases the additional damage to the streets and highways, yet there is no comment as to how the city of PT and surrounds will be compensated for this additional traffic and subsequent damage.

The mill has not even offered to hold open public hearings where residents may express their reservations and concerns. This smacks of arrogance and a total disconnect with the community it affects.

Certain groups and individuals have expressed concern that the mill employs from 100-200 employees and that any reduction in the mills profit margin will affect their lives. After more than 98 years of operations I can find no record of the mills' attempts to address the concerns PT residents invoke. Yet the mill is not the largest employer in the area which is often argued as a reason for the residents to simply "go with the flow." The Boat Basin and shipyard employ well over 1000 employees in various positions related to the maintenance of ships and boats. In addition there are the Jefferson Healthcare, Jefferson County and other employers which far outstrip the contribution the mill makes to the community as a whole.

The noise which emanates from the mill, while is not often addressed by residents, does affect all those within the acoustic boundaries and it is a 24 hour, 365 days a year audio assault on all those who live with the noise everyday. As a member of the armed forces (USN Submarine Service) I am very familiar with what that noise can do to those affected. Permanent hearing damage is one result of course but the constant assault on one's daily well-being cannot be discounted.

Please consider all these observations in your review of the proposed mill's expansion.

Response to Douglas Chartier

Ecology's air quality regulations prescribe how proposed increases in emissions are to be evaluated (WAC 173-400-111 and WAC 173-460). The "Findings" Section in the proposed NOC provides details on how the project was evaluated in accordance with those regulations. Please refer to the responses Ecology has provided above regarding "Increase in Odors," "Truck Traffic," "Noise," and "No Increase in Pollution/Deny the Project."

13. Comment from Liam Cannon

Any negative impact on the environment should be reduced, not increased, even if it is considered an "acceptable" amount. I do not agree with proceeding ahead with this project.

Response to Liam Cannon

Ecology's air quality regulations prescribe how proposed increases in emissions are to be evaluated (WAC 173-400-111 and WAC 173-460). The "Findings" Section in the proposed NOC provides details on how the project was evaluated in accordance with those regulations. Please refer to the response Ecology has provided above regarding "Toxic Trespass and Air Contaminant Review" and "No Increase in Pollution/Deny the Project."

14. Comment from Shely Reiss

I support the SEPA determination of non-significance for Notice of Construction Order 16293. The project will not result in emissions above current air quality standards and will not cause additional odors in the vicinity of the mill.

Response to Shely Reiss

Comment noted.

15. Comment from Brian Davis

I am all in favor of this!

Response to Brian Davis

Comment noted.

16. Comment from Bill Wise

Pleased to see the continued commitment to improvement at PTPC and balanced with an eye toward our environment. Less water use, more OCC in the mix and with little change to the energy footprint required. I thank PTPC for opening this dialogue to allow public input. I wholeheartedly support this effort for our community and for the economic benefits PTPC provides.

Response to Bill Wise

Comment noted.

17. Comment from Sheila Long

Thank you for the opportunity to comment on the proposed increase in hazardous air and water pollutants as a result of upgrading the pulping equipment at the Port Townsend Paper Mill (PTPM). The Department of Ecology (DOE) predicts this will impact our already damaged air quality by increasing volatile organic compounds by 0.8 tons per year, ozone depleting substances by 0.8 tons per year, and toxic air pollutants by 0.4 tons per year. Section 112(b) of the federal Clean Air Act defines hazardous air pollutants such as these as "...those pollutants that cause or may cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental and ecological effects."

While DOE states in its outreach materials "As long as all applicable requirements are met, these increases are allowed under air quality laws," the current regulations do not require that emitters report all chemicals they emit, nor do they address all of them. As an example, in one of the supporting documents, the statement "I am not sure if chloroform would need to be tested for" is a cause of concern.

Further, the Toxic Release Inventory database from which permitting decisions are made does not represent actual measured concentrations; rather, it allows industry to self-report using estimates, not actual measurements, and therefore, the State Department of Health (DOH) admits "...the accuracy [and toxicity] of these emissions is not known," and "the rules and definitions for reporting change from year to year."

I also dispute that the PTPM meets, or has a history of meeting, even the existing requirements. To wit: In August 2018, PTPM was fined \$4,500 by the State for the amount of carbon monoxide it emitted into the air in November 2017. In 2017, the PTPM was fined \$30,000 by the State for two noncompliance incidents in 2016. PTPM has a history of noncompliance. In fact, going back all the way to an October 1986 report by EPA titled “NEIC Potential Noncompliance Profile Region X,” Port Townsend Paper was listed as a “Significant Violator in Air” and separately as a “Significant Non-Complier in Water.” With 601,256 tons of CO2 “equivalents” emitted in 2017, PTPM continues to maintain its rank as 25th among Washington State’s worst greenhouse gas emitters. The mill’s intentions were called into question during a recent and particularly severe drought, when residents of surrounding areas were on the verge of water rationing while the mill refused to reduce its use of water. We remember that, and question now whether the increased production capacity will lead to an increase in water use despite the coming renegotiation with the City, of the use agreement. A good citizen does not harm his neighbors.

Increasing the mill’s pulp production capacity by 150% from 480 to 720 oven-dried tons of pulp per day and calling it compliant seems to suggest either that the requirements themselves are unreliable and deficient, or that the otherwise clean air of Jefferson County has plenty of “fill room” by toxic pollutants before thresholds of noncompliance are triggered. Thresholds of health effects are already being triggered—where is the analysis of existing and potential health effects? I could not find it. The DOE’s State Environmental Policy Act Determination of Insignificance contains not one shred of justification.

In fact, case law and Washington State law (WACs 173-400-040, 405-040 and 401-630) preclude toxic trespass, which is defined as the presence of environmental contaminants beyond the boundaries of an emitter’s property onto a person’s property, or in their water supply, or even in their bloodstream. Toxic pollutants enter our bloodstreams when we breathe the mill’s effluent. State law precludes the crossing of private boundaries by contaminants; in particular, odors, particulates, dust, and haze that are “detrimental to the health, safety or welfare of any person, or that may “interfere with use and enjoyment of property or cause damage to business or property;” all are prohibited.

In 2008 the Washington State Department of Health prepared a report at the request of residents of Port Townsend and Jefferson County. Admitting that the issues are complex and not easy to address, and also that no records of specific health evaluations existed, the DOH stated that it would be necessary to “clearly identify the contaminants of concern, measure the exposure, and demonstrate a complete exposure pathway.” DOH concluded, “All the information necessary to conduct a health study is not available to assess the possible health effects associated with air emissions from PTP mill.” Does “not available” mean the mill does not release this information, or the State does not analyze it? Either would be egregious.

If the mill has not made the needed information available, and if the State has not assessed the impacts, and since multiple complaints are being made nearly every day, about health and welfare effects, interference with normal activities, prevention of enjoyment of property, and the extra expense of home air filters in order to merely breathe normally, then how are these increases in toxic pollutants morally, ethically, or legally justified?

It is not enough to say the new equipment will be more efficient, because a 150% increase in the mill's pulp capacity, along with the inevitable aging of such equipment, guarantees further deterioration of our air and magnified health impacts. I strongly object to any increase in capacity until current air and water contamination issues are addressed. Thank you for your time.

Response to Sheila Long

Please see Ecology's response to Comment #4 above.

18. Comment from Chelsy Iorio

I am writing you because I am concerned. I just found out that I am pregnant and this is causing me to feel the necessity of moving away from my home in Port Townsend for the sake of my and my baby's health. I should not have to move away from my home to enjoy healthy, clean air and avoid health problems in myself and my family for the sake of one corporation's bottom line. I know that others are sending you this same message, and I hope that you take these requests to heart and take these risks seriously. Please help us in Port Townsend advocate for ourselves.

Thank you for the opportunity to comment on the proposed increase in hazardous air and water pollutants as a result of upgrading the pulping equipment at the Port Townsend Paper Mill (PTPM). The Department of Ecology (DOE) predicts this will impact our already damaged air quality by increasing volatile organic compounds by 0.8 tons per year, ozone depleting substances by 0.8 tons per year, and toxic air pollutants by 0.4 tons per year. Section 112(b) of the federal Clean Air Act defines hazardous air pollutants such as these as "...those pollutants that cause or may cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental and ecological effects."

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Increasing the mill’s pulp production capacity by 150% from 480 to 720 oven-dried tons of pulp per day and calling it compliant seems to suggest either that the requirements themselves are unreliable and deficient, or that the otherwise clean air of Jefferson County has plenty of “fill room” by toxic pollutants before thresholds of noncompliance are triggered. Thresholds of health effects are already being triggered—where is the analysis of existing and potential health effects? I could not find it. The DOE’s State Environmental Policy Act Determination of Insignificance contains not one shred of justification.

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If the mill has not made the needed information available, and if the State has not assessed the impacts, and since multiple complaints are being made nearly every day, about health and welfare effects, interference with normal activities, prevention of enjoyment of property, and the extra expense of home air filters in order to merely breathe normally, then how are these increases in toxic pollutants morally, ethically, or legally justified? It is not enough to say the new equipment will be more efficient, because a 150% increase in the mill’s pulp capacity, along with the inevitable aging of such equipment, guarantees further deterioration of our air and magnified health impacts. I strongly object to any increase in capacity until current air and water contamination issues are addressed. Thank you for your time.

Response to Chelsy Iorio

Please see Ecology’s response to Comment #4 above.

19. Comment from Elizabeth Berman

My neighborhood is directly up from the mill. We sometimes have a terrible smell and very loud noises coming from the mill. I want guarantee that smells and noises will ABSOLUTELY not be more than there is right now, which is already way too much. Once approved, it is impossible, in my experience, to improve the situation. Yes, the mill is important to this town, and so are the citizens who live here. We deserve a good quality of life, and people more scientifically savvy than I am need to have proof of what will result from these changes.

Response to Elizabeth Berman

Please refer to the responses Ecology has provided above regarding “Increase in Odors,” “Truck Traffic,” and “Noise.”

20. Comment from Shawntel Dinkuhn

I am concerned about the air quality of Port Townsend being affected by an increase of business at the mill. I am also concerned about the increase in truck traffic to the area. I would very much like the opportunity to attend a public meeting.

Response to Shawntel Dinkuhn

Please refer to the responses Ecology has provided above regarding “Toxic Trespass and Air Contaminant Review” and “Truck Traffic.”

21. Comment from Brian Webb

The Port Townsend Paper Mill is getting worse. I live in an area that is often affected by its horrible emissions.

My family and have stopped enjoying being outside on our deck or relaxing in the yard. All too often the smell is so severe that we close all the windows and stay inside.

I realize that the mill employees a lot of people in my community but, is it worth our quality of life and health? A family member has respiratory issues and on the days of extreme mill odor, her condition worsens.

I strongly urge that we have open, and public dialogue about the Mill and its plans to increase production.

Enough is enough!

Response to Brian Webb

Please refer to the responses Ecology has provided above regarding “Increase in Odors” and “Toxic Trespass and Air Contaminant Review.”

22. Comment from Mary Missig

Please hold a public meeting regarding the impact of the new equipment and process proposal by the PTPC.

Response to Mary Missig

Comment noted. A public meeting followed by a formal hearing was held on June 25, 2019.

23. Comment from Peter Herring

I do not know what sort of environmental impact, if any, the replacement of the pulper have, so not possible to make a useful comment except that I require more information. The mill's air pollution does affect my wife and I greatly; I have reported several incidents now. On days with a heavy odor, my wife sometimes gets a scratchy throat and has trouble breathing. I get a scratchy throat and sometimes a headache. Our interest is in having the mill replace its outdated technology so that it does not exude toxic chemicals into a nearby town, especially one that relies on tourism for much of its economy. If replacing the pulper lessens the output of toxic chemicals, then we're all for it. If not, it may address one of the mill's problems, but now ours. Thank you.

Response to Peter Herring

Please refer to the responses Ecology has provided above regarding "Increase in Odors" and "Toxic Trespass and Air Contaminant Review."

24. Comment from Niles Powell

I believe that the regulatory process is a hoax, which is why you do not hear from me too often, though I often think about, and am affected by, The Port Townsend Paper Company (PTPC). Corporate polluters are almost never shut down or made to completely clean up their operations. Nevertheless, I am submitting the following questions and comments about the changes "proposed" by PTPC. I put the word proposed in quotes, because PTPC will get exactly what they want, no matter what we all say.

Before you allow PTPC to proceed, please make detailed, honest answers to the following questions public.

- *Do you know, from a public vote, what percentage of the people who live around PTPC would like to see it gone, or, at the very least, have its operations completely internalized and cleaned up? Why don't you know that? If you don't know that, how can you represent us? Like I said, I'm not so foolish as to think you represent us. I just want you to realize that you don't. You can't fairly mediate or negotiate a conversation between two parties, like the PTPC and the local citizenry, if one of them, PTPC, has a 10,000 watt megaphone.*
- *How many more trucks will be going to and from the mill each day? How much of an increase does that represent, as a percentage of the current truck traffic?*
- *Will PTPC bear the total cost of increased wear of area roads? If not, why not? This is one of the many ways which this corporation uses to externalize its costs.*
- *Is the increased pollution from the added diesel truck traffic accounted for in the pollution impact reports? If not, why not? This is currently another externalized cost.*

- *PTPC spokespeople have said in the media that the digester is going out of service in conjunction with the proposed increased emphasis on and production of recycled paper materials as feedstock. However, if the resulting product goes from a range of 20-40% recycled up to 60%, and PTPC says that the digester is going out of service, what is the source of the virgin stock?*
- *Will the digester be completely removed?*
- *If the digester is not completely removed, is PTPC required to remedy the flaws recently identified by the EPA in 2017 and formalized in their 2019 Consent Decree? If so, on what time frame?*
- *If the digester will continue to be used or available for use, what will be the percentage change in its operations?*
- *Will PTPC be able to resume the digester-related processes at increased levels at a later date?*
- *If the digester remains available for use, will modern upgrades to the digester be required before it will be allowed to resume operation?*

If the digester is not permanently decommissioned, PTPC must be required to remedy flaws identified by the EPA immediately. Upgrading the digester to meet modern standards should be required - a nearly 100 year old polluting process should not be allowed to be grandfathered-in.

In the event that PTPC continues or reverts to using the digester or similar processes at any time, Ecology should require PTPC to implement modern, less polluting processes and equipment. The project terms should specify that the old equipment will not be grandfathered-in.

If PTPC can revert to higher usage of the digester, then the permitting for the project must account for maximum potential pollution from the whole system.

Fines for not remedying the flaws should resume from when the EPA's recent consent decree regarding the digester was levied.

These are matters for the project permit process, because PTPC's continued pollution and net pollution change are part of the overall evaluation of the project, and to the extent that diminished use of the digester or other equipment and processes is used to support the proposal, then continued or resumed use of that equipment and those processes must be factored in. That is, the potential for reverting to present conditions undercuts any claims by PTPC of reduced pollution and impacts.

Response to Niles Powell

Ecology staff implement and enforce environmental regulations that have been established to protect human health and the environment. Ecology's air quality regulations prescribe how proposed increases in emissions are to be evaluated (WAC 173-400-111 and WAC 173-460). The "Findings" Section in the proposed NOC provides details on how the project was evaluated in accordance with those regulations. Please refer to the response Ecology has provided above regarding "No Increase in Pollution/Deny the Project."

PTPC has stated in the State Environmental Policy Act (SEPA) checklist that the increase in truck traffic will be approximately 4 additional trucks per day. Ecology determined that the environmental impacts from the increased truck traffic were not significant enough to require an environmental impact study.

This permitting action is for the replacement of the OCC pulper and not the decommissioning of a digester. Specific questions regarding the enforcement action against PTPC should be directed to the Environmental Protection Agency (EPA).

25. Comment from Robert Dickey

I find it very wrong in a severe drought to increase production, produce more green house gases with more air pollution, Increase carbon foot print, Greenhouse gas, nutrient loading and rate blank to pollute the air we breathe. This is insanity. The mill is self regulating since the clean air act, Pollutes more, Now more trucks, More production, more toxic poison. This mill should be shut down. It is an environmental terrorist and toxic nightmare.

Response to Robert Dickey

Please refer to the responses Ecology has provided above regarding “Water Usage”, “Toxic Trespass and Air Contaminant Review,” and “GHG Emissions.”

26. Comment from Kit Malone

I would like to formally object to any increase in emissions and to request that emissions be lowered substantially.

Why we are subject to the sulphurous smell is beyond me.

Thank you for the opportunity to speak.

Response to Kit Malone

Ecology’s air quality regulations prescribe how proposed increases in emissions are to be evaluated (WAC 173-400-111 and WAC 173-460). The “Findings” Section in the proposed NOC provides details on how the project was evaluated in accordance with those regulations. Please refer to the responses Ecology has provided above regarding “Increase in Odors” and “Toxic Trespass and Air Contaminant Review,” and “No Increase in Pollution/Deny the Project.”

27. Comment from Peter Herring

Thank you for the opportunity to comment. I commented yesterday, but I had not scrolled down in the email I received far enough to find the link that led to the brief report on increased emissions due to this proposed "upgrade." Please replace my earlier comment with this updated one. Thank you.

Air quality impacts

The following air pollutants (emissions) are expected to increase because of this project.

*Volatile organic compounds by 0.8 tons per year (tpy) - Note: these are non-specified.
Ozone depleting substances by 0.8 tpy
Toxic air pollutants by 0.4 tpy.*

I write this on a day when we awoke to the smell of H₂S and my wife was coughing for an hour. The house smells of H₂S. What we want to see is less emissions from the mill, particularly harmful VOCs - however the list of toxic chemicals from the mill is long and dangerous. Monitoring of these substances is neither thorough nor accurate.

I am strongly opposed to any increase in emissions from the mill. The old argument that the environment (and people) must abide with toxins in order to obtain the benefits of industry is spurious and dangerously outdated. The precarious state of our world today demands that we unclean industries. That includes toxins and greenhouse gases: PTPM (according to most recent data I can find) ranks 25th among WA State's worst greenhouse gas emitters, with 601,256 tons of CO₂ equivalents in 2017. Given dire scientific climate change reports from numerous worldwide agencies, this is intolerable.

The determination that the pulper expansion does not represent Significant Deterioration examines only 4 of the chemicals that the mill emits, excluding, for instance, H₂S, and many others - there are well over a dozen. I'm certain I don't need to reproduce the list here.

I have reviewed several papers on cleaner processes for pulp/paper mills, but without knowing the state of the technology at the PTPM I know no way to determine how they might alter their processes. The fact is, this expansion has nothing to do with operating more responsibly (the mill's 18 year irresponsibility recently cost them \$350K). It is about making more money at the expense of our community. Polluting industries such as this typically do not pay the full costs of their operations, which includes the costs of cleaning up their pollutants - air, land, and water - or the health costs incurred by a community. These costs are "off books" to the company, but they are very "on books" to the communities and people who bear them. I cannot find existing data on health impacts of the mill causes; however, the health effects of many of the toxic chemicals releases by the mill are well known. (Not all of these chemicals are monitored, and there are no GIS overlays corroborating hospital/doctor visits and noxious releases, nor data showing abnormal rates of asthma, cancer or other health effects in Jefferson county).

As usual we're following an old disproven model here. That is, introduce toxins into the environment and put the burden of proof of harm on the environment and those affected. This is backwards. The burden of proof should be on the emitters to prove that there is not a harmful effect on environment and people. As it stands, the EPA and WDOE must fight a rear guard battle for "mitigation" of poisons and greenhouse gases released into air that assuredly does not belong to the mill; it belongs to every living creature on earth.

I am entirely opposed to this expansion unless the mill simultaneously reduces, not increases, its toxic emissions.

Response to Peter Herring

Ecology's air quality regulations prescribe how proposed increases in emissions are to be evaluated (WAC 173-400-111 and WAC 173-460). The "Findings" Section in the proposed NOC provides details on how the project was evaluated in accordance with those regulations.

The listed chemicals/pollutants that are listed in the documents only represent emission from the OCC Pulper Upgrade project and not emissions from the entire mill. Ecology evaluates the environmental impact of the emissions from project therefore chemicals/pollutants like H₂S (which are inherent to kraft pulping process and not the OCC pulping process) are not included in the analysis.

Please refer to the responses Ecology has provided regarding "Increase in Odors," "Toxic Trespass and Air Contaminant Review," "GHG emissions," and "No Increase in Pollution/Deny the Project."

28. Comment from Nancy Botta

If this project helps get toxic emissions out of the air we breathe then I support it.

Response to Nancy Botta

Comment noted.

29. Comment from Jesse Hoffman

I have already submitted a comment, but it occurred to me that if the mill requires a certain percentage of virgin material in its recycled paper and recycle production is increasing due to this project, won't that necessitate a proportional increase in the kraft process? If so, that WOULD increase odor AND quality of life issues which are already an unacceptable trespass on peoples' right to breathe clean air and to not be made sick by these emissions. Please ensure this question is answered. Just because this particular piece of equipment does not add to the odor does not necessarily mean that it won't, through increasing overall production, result in a rise in sulphur compounds in the air.

Response to Jesse Hoffman

The OCC pulper upgrade project will increase the capacity of the mill to produce pulp from OCC. Kraft pulping capacity will remain unchanged. Currently, Paper Machine 2 (PM2) at PTPC produces paper with a 47% average OCC content. After the upgrade, PM2 will be able to produce paper with a 70% average OCC content.

30. Comment from Kathy Ryan

The meeting this past Tuesday at Fort Worden clarified that the pulp and Kraft mills are different and that the pulp mill would not add significant amounts of VOCs to the atmosphere, and would conserve water.

I recycle and reuse cardboard and paper and try to minimize use of packaging. So, from that standpoint, this is good.

It was not part of that meeting to address jobs or toxins emitted from the old Kraft mill, but having said that, I much prefer a project powered by renewables to use of fracked gas, or addition of even 4 trucks spewing deisel fumes over heavily trafficked county roads. (COuld the fleet be electric? Would water transport by barge be viable?)

I have problems with any additional emissions.

I am chemically sensitive, especially to formaldehyde and chlorine, and have been reporting levels of toxic odors to the Mill (with no response) and to ECY for several years, since I became aware that the date were collected. I took a medical retirement because of air quality issues and resulting respiratory illness which exhausted my sick days. I researched carefully before we purchased a home in PT (to be closer to new grandchildren). The fumes now are more regular and intense. They have been recorded covering the Quimper Peninsula from Discovery Bay to Puget Sound between Kingston and Edmonds on the Kitsap Peninsula. I was pleased to see that this is being addressed after a fine by EPA. It should have been addressed much earlier.

The mill provides jobs and living wages. No complaint there.

They probably do more to conserve water than the City...undoubtedly. No complaint there.

At the Grange and Birchyville Foodbank Gardens, and at all the school gardens here and in Chimacum, we benefit from the use of biochar.

Kudos.

They have tried to be good neighbors.

BUT the fumes are bad. I hate to smell them inside the hospital or by the elementary school.

Please, no more with the new project. And fix that Kraft mill.

It has cost so many of us so many otherwise productive days.

Response to Kathy Ryan

Ecology's air quality regulations prescribe how proposed increases in emissions are to be evaluated (WAC 173-400-111 and WAC 173-460). The "Findings" Section in the proposed NOC provides details on how the project was evaluated in accordance with those regulations.

Please refer to the responses Ecology has provided above regarding "Increase in Odors," "Toxic Trespass and Air Contaminant Review," and "No Increase in Pollution/Deny the Project."

31. Comment from Rebecca Christie

I commend the increased use of recycled materials, and upgrading aging equipment for greater efficiencies. However, a 50% increase in the mill's pulp capacity will contribute to further deterioration of our air quality.

I remain very concerned about any increase in VOC emissions. Many residents of Port Townsend are adversely affected by the toxins and odors emitted by the kraft pulping process. My understanding is that the Old Corrugated Cardboard recycling process is less malignant than the kraft pulping process, but I would like to see cumulative impacts considered.

I cannot support an increase in capacity until current air and water contamination issues are satisfactorily addressed.

Thank you for the opportunity to comment.

Response to Rebecca Christie

Ecology's air quality regulations prescribe how proposed increases in emissions are to be evaluated (WAC 173-400-111 and WAC 173-460). The "Findings" Section in the proposed NOC provides details on how the project was evaluated in accordance with those regulations.

Please refer to the responses Ecology has provided above regarding "Toxic Trespass and Air Contaminant Review" and "No Increase in Pollution/Deny the Project."

32. Comment from Charles Law

The increased truck traffic to and from the mill due to the increase in production has me not only concerned about the ground-level ozone that is formed when sunlight and hot weather bake vehicle exhaust and factory emissions, but also the excessive diesel nitrogen oxide vapors, a known greenhouse gas. Nitrogen oxide from these heavy-duty vehicles is a key contributor to outdoor air pollution. Long-term exposure to these pollutants is linked to a range of adverse health outcomes, including disability and reduced life expectancy due to stroke, heart disease, chronic obstructive pulmonary disease, and lung cancer.

I feel these air quality issues surrounding the proposed increase in pulp capacity have not been properly addressed.

Response to Charles Law

The EPA has established National Air Quality Standards (NAAQS) to protect the air we breathe. Air sheds are evaluated for compliance with these standards. Air sheds which are above the standards are considered in "nonattainment." EPA has established NAAQS for ozone and nitrogen dioxide. Currently all of air sheds in Washington State are in attainment and are meeting the standards for ozone or nitrogen dioxide. The increase in truck traffic associated with this project is not expected to cause the area to exceed any of the NAAQS.

Please refer to the response Ecology has provided above regarding "Truck Traffic."

33. Comment from the Olympic Environmental Council

SEPA Question 3.

a. Surface Water:

Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, salhuater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, slate what stream or river it flows into.

The mill is located on the waterfront of Glen Cove and Port Townsend Bay

. 6) Does the proposal involve any discharges of waste matenals to surface waters? If so, describe the type of waste and anticipated volume of discharge.

The OCC plant currently discharges 270 gpm of wastewater which equals 0.4 million gallons per day. This water contains 1,142 ppm of fiber solids which equates to 1.9 tons per day.

Current estimations from project engineers is 260 gpm and 2.0 tons per day of fiber solids after the upgrade. The current solids loading rate is based on sewer study measurements, whereas the post project value is an engineering estimate. The new cleaning system will produce more yield, and is expected to reduce fiber losses to wastewater. Because of the improved fiber yield, there will be no increase in sewer loading from OCC to the wastewater treatment system. Most fibers from OCC are settleable and are removed in the primary clarifier. Any carry over will settle in the ASB.

Discharge of fibers into the wastewater system is not expected to result in a discharge of fibers to a surface water (Port Townsend Bay)

b. Ground Water:

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well

Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known

No

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural, etc.). Describe the general size of the system, the number of SUCH systems, the number of houses to be served (if applicable), or the number of animals or humans the system (S) are expected to serve.

Does not apply

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Since this project is inside an existing structure there is no impact to Stormwater.

2) Could waste materials enter ground or surface waters? If so, generally describe.

No. This project is inside existing an existing building and is not expose runoff.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of so, describe

ANSWERS

This project will result in the generation of up to 44% more landfill waste which is generated from the non-burnable OCC rejects. Based on 2017 rates, this would equal 4,412 additional wet tons of OCC non-burnable rejects. This waste stream is mainly composed of tape and plastics that are separated from the OCC.

"6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

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Discharge of fibers into the wastewater system is not expected to result in a discharge of fibers to a surface water (Port Townsend Bay)"

COMMENT

There should be more discussion of both discharges to PT Bay and more detailed discussions of actual composition and fates of specific non-burnable reject waste streams.

In the process flow diagram the fate of the water component and suspended solids is not indicated. The checklist states no additional discharges of fibers to surface or groundwater from the OCC process, but fails to define the full path that the discharged water has followed. The process flow diagram indicates a nearly closed loop process, with no indication of subsequent disposal while the checklist indicates 0.4 mgd of discharge.

Formal concern we raise involves coating materials - and specifically pigments, water repellents, microplastics, and nanomaterials, and if and how they are removed from effluent, and if not, how we can be assured they are and will remain de minimus..

Response to Olympic Environmental Council

Wastewater from the OCC pulper is currently sent to the wastewater system for treatment prior to discharge. The wastewater from the proposed OCC pulper will also be treated in the same system. No changes to the treatment of the wastewater from the OCC pulp mill are proposed and the current system has sufficient treatment capacity. The discharge from the treatment system is regulated by a national pollutant discharge elimination system (NPDES) permit (Permit No. WA0000922).

34. Comment from PT AirWatcher

First, thank you for the public presentation about PTPC's OCC pulper upgrade project on Tuesday, June 25, 2019 at Fort Worden. It was a good discussion and we learned a lot.

Recycling

- *Increasing recycling, and making more of the goods that we use out of recycled materials is a good step in general.*

Water

- *Less use of water is good step. We notice that in one venue, a PTPC representative said that this project would result in them using a million fewer gallons per day. In the meeting before WA Dept of Ecology, that reduction fell to 500,000 gallons per day. While water savings is good and we especially appreciate that, (a) which is it? (b) PTPC still uses more than 10x water than the rest of the Olympic gravity water system combined, and pollutes it on the way out.*

Air Pollution

- *This project will increase air pollution. The increase is said to be a "small amount." It is appalling that the particular pollutants that will increase even this "small amount" are some of the more nasty ones, at least those listed in Table 3, NOC p17, TAP Emission Summary (including aldehydes, chloroform, MEK, and others) and discussed in later tables. The community is suffering under the mill's ongoing pollution so every increase adds to our health burden. Ecology must start requiring PTPC to reduce its air pollution generally and with every new project.*

Trucks

- *PTPC and Ecology represent that there will be an increase of "only four trucks." A typical semi truck carries about 24tons of material. The NOC application says that production will increase by about 118,000 ADTs. Counting both that amount of incoming raw material, arguably mostly OCC, and arguably more since some of it will be waste, plus outgoing product gives an increase of at least 236,000 tons of material, which is more than four truckloads. How will that material be moved, what amount by truck, barge or other means, and whatever the barge:truck ratio, has Ecology considered the ecological consequences of that transport?*

Asbestos

- *The PTPC facility is widely understood to have considerable asbestos throughout. Will any of it be disturbed during construction? In such a facility, before issuing a construction permit, Ecology should require showing that all workers will be adequately protected from asbestos. Further, if it is not in Ecology's bailiwick, in whose is it? Regardless, since Ecology is issuing the permit to greenlight the project, its consideration should be included.*

Digesters

- *Digesters. Now we understand that the M&D digester that PTPC says they are decommissioning (one presumes that they are removing it. Are they? Will it be replaced with another?) is NOT related to the project. Twelve digesters will remain in service and taking up the slack since the Kraft process will continue at its current level. Therefore we will get no relief in emissions due to that change.*

I was surprised that after all of these years of overseeing PTPC and PTPC has long been making a product that blends recycled and virgin material, Ecology says they are completely unfamiliar with the equipment and particulars of the blending. Blending the two streams, and changing ratios or volumes may or may not create a chemistry that releases pollution of concern, so that should be examined before a permit is issued, even if only to ensure that there are no unanticipated effects.

It is also surprising that, as pulp mills have been making recycled/virgin material blends for decades now, that NCASI only has two small studies on the pollution effects of burning waste material from OCC pulping process. That's not reassuring for the science behind some of these decisions!

Response to PT AirWatcher

Recycling: Comment noted.

Water: At the meeting, the PTPC Mill Manager (Kevin Scott) stated that there would be a 0.5 million gallons per day reduction in water usage. In the SEPA checklist, PTPC states that the old OCC pulper uses approximately 270 gallons per minute (gpm) while the new OCC pulper use approximately 260 gpm. If looking only at the OCC pulper than the reduction is 10 gpm. Additional water usage reductions may occur at other points in the papermaking process as a result of the project, but specific details have not been provided to Ecology about those reductions.

Trucks: PTPC ships product by both barge and truck. Ecology notes that the increase in production of 118,000 ADT mentioned in the comment is on an annual basis, not daily basis, and is assuming operation of the pulper at maximum capacity for the entire year. An increase in four trucks per day is an estimate provided by PTPC in the SEPA checklist associated with anticipated actual production increases. This value is substantially below a level of significance that Ecology would consider might contribute to a significant, adverse environmental impact. Therefore, requiring an environmental impact study or additional mitigation is not necessary.

Asbestos: PTPC is required to follow all regulations regarding the removal and disposal of asbestos at all times. Notifications regarding asbestos removal must be submitted to Ecology. This project/permitting action does not change the existing regulations and requirements regarding asbestos management.

Digesters: The M&D digester is not a part of this proposed project. Specific questions regarding the enforcement action against PTPC should be directed to the Environmental Protection Agency (EPA).

Pulp Blending: Blending two sources of washed pulp (both composed of cellulose fibers) does not involve any chemical addition or others processes that might generate substantial air emissions. Both sources of fibers have been washed thoroughly prior to blending. Washed pulp has not been identified by EPA or Ecology as being a source of emissions of concern.

OCC Burnable Rejects: Due to an increase in screening efficiency there will be an estimated 47% decrease in burnable rejects. These burnable rejects are defined in the regulations as being, “secondary material generated from the recycling of paper, paperboard and corrugated containers composed primarily of wet strength and short wood fibers that cannot be used to make new paper and paperboard products.” Burnable rejects compose approximately 3% of the fuel at Power Boiler #10. This value will be halved following the upgrade project. Ecology notes that the facility is required to account for the OCC burnable rejects as part of the federal Boiler MACT (40 CFR Part 63, Subpart DDDDD) requirements and ensure that they will not cause the facility to exceed any of the limits established within that standard.

35. Comment from Matthew Berman

I don't like the smell, any chance of covering the holding ponds like a sports stadium?

Response to Matthew Berman

The proposed project will replace the existing OCC pulper with a new continuous OCC pulper. The comment period is an opportunity for the public to provide comment on the proposed project as well as the draft Notice of Construction order. This comment is outside the scope of the proposed project. However, please refer to the response Ecology has provided above regarding “Increase in Odors” for more information about odors related to the proposed project.

36. Comment from Pete Langley

For the record, my name is Pete Langley, resident, 11 Crutcher Road, and business owner -- (inaudible interruption) business owner in Glen Cove. I also represent several different factions on the marine trades board, as well as the Jefferson County Historical Society.

Just a couple comments to go on. A lot of us are sailors. Yep, we use the mill smoke to direct which way we go. I, also being in the manufacturing business, represent a lot of the parts that are at the mill. My encouragement for the mill is to be profitable, move into this recycling sector and do that. Again, part of the whole goal is to reduce the emissions. I think this town and the community has a lot of expertise that's not being utilized in a lot of our industry, a lot of our community as well, that if we put those heads together, we could have almost a zero-emission mill.

How many people want to continue to watch the container ships or the cruise ships that drive by our home every day, which are the equivalent of 6,000 to 7,000 automobiles in a single row -- have you ever seen a cruise ship flush its toilet out at sea three miles off our coast? That's what they're doing. How do we turn this around and keep an industry?

Quality of life is important for a number of sectors. We wouldn't have the hospital we have if it wasn't for the mill and some of the long-term care that the mill has been providing through their healthcare. We wouldn't have good jobs that pay a full living wage. That's a quality of life.

If we can't provide good jobs for youth here or other jobs that provide for engineers or higher-education people, I think that's what the mill needs to aspire to. One is bringing in people that will help resolve this issue, resolve a lot of the things for our community. But we can't afford to have them stop, because we're going to end up with plastic bags everywhere.

So I would hope we can get them to look at alternative products we can make with their pulp. One is getting us back to the reality of what a lot of us drink from a cardboard container, which is important, part of the biodegradable asset within our community. And I think we ought to take good pride that if we can change this mill and get some of the reduction of these concerns, the pollution, in a way that we can actually make a model for maybe the rest of the world to look at. We're the only place that can do it because we're a group and usually a community that will talk and work together.

So, from that aspect, I would hope that we can all work together and solve this problem, help them be profitable and get more into recycling, shut down some of the kraft stuff, and let's reduce the impact and still have the jobs that we need.

Thank you.

Response to Pete Langley

The comment period is an opportunity for the public to provide comment on the proposed project, the draft Notice of Construction order, and the SEPA determination of nonsignificance. The comments and concerns expressed are outside the scope of this permitting action. The comments and concerns have been noted.

37. Comment from Debra Ellers

Hello. I'm a full-time resident of Port Townsend, living on 17th and Quincy Street.

Port Townsend adversely impacts my life on a daily basis with its emissions, smells, and impacts on area roads.

I'm concerned about the following areas:

Increase in toxic emissions. As a runner and bicyclist, I've experienced throat irritation when the wind is wrong and brings Port Townsend Paper's emissions towards me while engaged in these activities. I have also had watery eyes and headaches at home when the fumes are strong.

I do frequently worry about what the exposure long term to these toxic emissions will be on my health, and wonder whether I should stay in Port Townsend long term.

I made this my home, and I want to make this work, but my position is that any increase in toxic emission should be unacceptable. The mill should have to decrease some other level of their substances to offset this new operation.

Another concern I have is the increase in greenhouse gases, in that Port Townsend Paper is already Jefferson County's major emitter of greenhouse gases equal to hundreds of thousands of vehicles on the roads annually. In this era of climate emergency, there is no way any increase in greenhouse gases for any operations from any source should be permitted.

Port Townsend Paper indicates it will increase deliveries of the recycled cardboard by four trucks per day. Big diesel trucks are notorious emitters of nitrous dioxide, a powerful greenhouse gas. Already, how many trucks does this facility have coming and going that already contribute to greenhouse gases?

What about the increases in shipment from the increased production and the waste from the increased production? What is going to happen with this stuff, and how will it be transported? Presumably, more trucks, meaning an increase in truck traffic.

We know that our narrow two-lane highways, Highways 104, 19, 20 and 101, are already congested and dangerous. I personally have seen much Port Townsend Paper truck traffic on these area roads causing delays and long strings of traffic at times.

I worry about the wear and tear on these roads, the cost to taxpayers, and particularly I worry about the safety risks because there have been at least two fatalities reported in local media in the last year and a half involving collisions with trucks associated with the mill operations. I am truly concerned that more trucks equals more accident risk on our crowded roads.

In conclusion, I will say Department of Ecology should make a determination that there are significant impacts associated with the permit, and conduct a full environmental study. I strongly object to proceeding with any increase in air and water pollutants as this proposal would do.

Thank you.

Response to Debra Ellers

Please refer to the responses Ecology has provided above regarding “Toxic Trespass and Air Contaminant Review,” “GHG Emissions,” “Truck Traffic,” and “No Increase in Pollution/Deny the Project.”

38. Comment from Gretchen Brewer

I'm Gretchen Brewer. I live in Port Townsend, and I'm going to just keep my comments brief today so that I can digest some of what's been said here.

But I agree with some of the things that have been said, that even with a project like this that on the surface seems good, we need to look at the overall detriments to it, the externalized costs, such as truck traffic, any reduction in jobs.

One thing that I will say is -- is, presently - let's see, I'm looking for my chart here - presently, the mill uses about 10 times -- 10 to 12 times the amount of water that the whole rest of the user base uses.

And even with these reductions, it's still a giant amount of water, which it uses, pollutes, and puts into the water, into our Port Townsend bay. I would like to see that reduced to -- well, just reduced significantly. It's one of the biggest users and polluters of water in our area.

Also, would the -- would the -- the impacts of the mill's pollution be reduced significantly? Because even when it meets Ecology and EPA standards, it still is -- is dramatically harmful to our lives. So that really needs to be addressed.

I would -- would a project like this lead to shutting down the kraft pulping section or -- or, as Pete -- as Pete suggested, we come up with a way that communal -- communicative -- within the community, we come up with a way that we can have a zero -- zero-waste/zero-pollution facility? And I think it can be done and it needs to be done.

So I'll save the rest of my comments for written.

Thank you.

Response to Gretchen Brewer

The comment period is an opportunity for the public to provide comment on the proposed project, the draft Notice of Construction order, and the SEPA determination of nonsignificance. The comments and concerns expressed are outside the scope of this permitting action. The comments and concerns have been noted.

39. Comment from Jesse Hoffman

I would like to see the mill work towards clean renewable energy to power all of their equipment. I would like to see their kraft process change -- or go away. If it changes, I would like there to be a consideration for hemp fibers, to spare our forests and because it produces better paper with less pulp.

And I would also like them, if they are going to keep pulping virgin material, to consider looking into pilot studies and research programs, maybe some outside investment looking into bio-pulping and enzymatic processes to process that pulp so they're not using as many hazardous chemicals, or any at all if they don't have to.

I'll just leave it at that because

Response to Jesse Hoffman

The comment period is an opportunity for the public to provide comment on the proposed project, the draft Notice of Construction order, and the SEPA determination of nonsignificance. The comments and concerns expressed are outside the scope of this permitting action. The comments and concerns have been noted.

40. Comment from Doug Chartier

I'm Doug Chartier, and I live at 101 Vista Boulevard, on the bluff in the picture, right above, on the corner. And been there three years now.

And there seems to be great support for the mill because of its contribution to the city regarding jobs and output that is helpful for us all. No mention has been made that that working population is rather small compared to the thousand-plus people that work at the Boat Haven. I don't know how many work for the County or the City. And nobody mentions those people who are now horribly impacted by the output of the mill's sulfur products - I thought it was just H₂S. It's a whole lot more, obviously - and the noise. There's an enormous 24-hour very loud noise which goes on day after day after day except for 10 days in October when they shut 'er down and everybody goes on vacation.

The other thing I'm really concerned about is there -- there's a down-mill road, and in that -- those environs, there are people who are living 24 hours a day right in that envelope of -- of pollutants and smell and the noise. Why isn't somebody stepping up to talk about that? Why isn't -- I mean, is there a reason why the people themselves haven't gotten together and said, gee-whiz, let's go talk to the City, let's go -- not the City, the County, because that's where they are. I'm very, very concerned about that.

A little background and then I'll leave you...

I'm a nuclear reactor plant operator/constructor. I've been overseas building huge plants, NGL power plants. I have three college degrees. And I don't understand how the mill has, for 90 some years, gotten away with raping the city of Port Townsend.

And that's all I have to say at this point. Thank you.

Response to Doug Cartier

Please refer to the responses Ecology has provided above regarding “Noise,” and “Toxic Trespass and Air Contaminant Review.” The environmental review for this project evaluates the highest potential impact location and ensures that it is compliant with the thresholds that ensure environmental health and safety.

41. Comment from Peter Herring

My name is Peter Herring. I'm a relative newcomer to town. I live on Taylor Street. I've lived here since December, but I've been coming to town -- I love Port Townsend, I've been coming here for 10 years because I have relatives that live here.

I have a background that allows me to understand a fair amount of this scientifically, but I'd like to give some personal information to what's happened since we've moved here. We have thought of leaving several times.

My wife, who I mentioned earlier, is a chemist and has a good understanding of the chemicals that are emitted here. Woke up this morning, for instance, there was a lot of odor in the air. People are referring to H₂S as a lifestyle problem. It's not. It's a poison/toxin that happens to smell. It's one of the few that we can smell. She gags and has trouble breathing and so forth on that. I don't know how many people in this town are affected in that way, but we've talked with people that we know, and at least we've run across other people that are.

I'd like to restate what's happening here in a way. And I'm not restating this as something that Ecology can take care of. But I think we have the equation backwards. The way we generally look at these things is the polluter comes and they want to put out certain chemicals and so forth, and then the burden of proof follows -- falls onto the world and onto people to then prove that those are harmful. I'm saying that's a backward process.

The process should be, when someone is going to introduce a new chemical that may be harmful, the burden of proof falls on them to prove that that chemical is not harmful. And that's a process that never happens in this case, and instead what we have is regulatory industries that come and try to limit known toxins from us.

So I think partly what's happening here tonight is that we're hearing people -- we have to address a certain issue, but people have come with kind of a backlog of issues on this that we haven't been able to address. And there's a kind of -- there's kind of a conflict between the numbers and the data that we're being given and the experience that we actually have, which is when you wake up gagging and so forth like that. Okay?

So I see a lot of nodding heads, so I know I'm speaking to people who experience this. So...

Where do we go with that kind of stuff?

I've liked a lot of the comments that I've heard here. I'm not up here to say -- I've been a business person myself. I worked in marketing. To say that, you know, the mill should shut down or something like that, clearly, jobs and so forth are good. The old equation to that, we have to balance jobs and health jobs and the environment, is an equation that we cannot afford anymore, not in the crisis world that we live in now.

So the comment that I've liked the best, and I would like to make -- turn this into a positive thing, is that if the mill became a better neighbor to the town, if there were an actual discussion in this, how could we improve the mill, how could it -- you know, how could it use different products? Hemp is a great thing. We may be talking whole processes that need to change over here.

We have a 90-year-old thing, outdated technology. We're not simply talking what are, you know, the things we can regulate. We're talking about best practices. What are best practices? They've certainly changed in 90 years.

So if there were a great give-and-take between the City, the people of the city... I see a lot of talented, incredibly educated people in this town. And the mill -- I think we could probably solve this problem in a way that's not combative or opposing each other, but there needs to be a kind of stepping up between the mill and the populous of this town. I would fervently love to see that happen. I would love to stay in Port Townsend, but this is an incredibly large issue to us, so I'm dedicated to helping do something about it.

Thank you.

Response to Peter Herring

As stated, there is a backlog of issues and concerns that go beyond the scope of the OCC Pulper Upgrade Project.

The comments and concerns expressed are outside the scope of this permitting action. The comments and concerns have been noted but no action has been taken with respect to this permitting action.

42. Comment from Mary Missig

My name is Mary Missig.

And just a reminder, everybody, we -- the City of Port Townsend owns the water rights. I mentioned it tonight. We're renegotiating with the mill. It's already starting. And if ever there was leverage for what Pete was talking about, working together and creating a win-win situation, it's now.

So I highly recommend you talk to our city government. They're willing to listen. And I'm hoping -- I'm hoping the mill is, too.

Thank you.

Response to Mary Missig

Comment noted.

43. Comment from Joe Breskin

So my name is Joe Breskin, and I've been here for about 45 years now.

And the thing I want to talk about sort of dovetails with the last two comments. About a little over 20 years ago, going on 25 years ago, we dove into a multi-party agreement to manage the city's watershed to meet what had just been promulgated as a federal rule, the Surface Water Treatment Rule. And we were able to cooperate with the City and the Forest Service and the paper mill and Department of Health and end up with a three-party agreement that dramatically exceeded the water quality standards without requiring us to put in a water filtration plant for which we had no funding and no ability to afford.

And Stan Cup at that point was the maintenance manager for the mill and did a magnificent job sitting down with the City and helping us redesign the City's water system, in dramatic contrast to the system that CH2M HILL had designed for us, which would have cost five times as much. And he basically looked at the valve and asked some things, and said, well, I'd love to be able to do that in the mill, but I can't afford to do that. You know, you could do that with two valves.

And we've been having a variety of conversations with people at the mill for a very long time about how to divert chemistry that currently wasn't being optimally utilized. And I think there's -- there's a lot of room in this. I'm generally in favor of this project. I like the idea of it.

One of the things that -- when you think about how much water gets used in this community, the mill recycles water phenomenally. The level of recycling that goes on in the mill last time I looked, it was 13 times. It's probably double that at this point. And almost none of us are actually, in our own lives, playing at the level of rigor that's being played at the mill.

And so that's the good side of it. The dark side of it is that there's technology that really needs to be brought to bay to deal with emissions because the emissions are a real problem.

And there is a point where I was going to do a pretty substantial study on diversion of the effluent plume and what it would take to clean it up because that's an amazing resource, and it could be argued that it could be bottled right now and sold to Nestle.

But -- but there's really a lot of opportunity for engaging this machinery. And historically, I've been really disappointed with Department of Ecology's siloing and the disconnect between ecology and industrial or what we think of ecology and what we think of as industrial ecology.

The first slide that went up today was really interesting because it said, industrial draft did the permit for the mill. Right? That's a really different process than you would see in the normal world, where you would draft your permit and you would take it in and you'd get kicked around, and...

We've had some interesting -- yeah, I see Gretchen's hand go up. But we've had some interesting interactions. We were -- we were opponents of the biomass plant because the pollution for the biomass plant was completely out of proportion to the benefits that could accrue from it to anybody accept some people at Sterling Energy. And this is not a project that I would fight as a community. This is a project that is in the right direction.

There are questions that I have about it that aren't -- wouldn't be addressed in the level of permitting process that I'm seeing here, would be addressed if we went deeper.

One of the things that comes out of recycling paper and recycling cardboard that's been painted is filter cake or some manner of clays that were on clay-coated paper -- (inaudible interruption.) Am I done?

So, anyway, that -- that stuff is -- can be either seen as hazardous waste and treated as hazardous waste or it can be treated as a valuable product, and I don't think that the permit documents address that level of issue, and I would like them to.

Response to Joe Breskin

Some of the comments provided are outside of the scope of this permitting action. With regards to the disposal of waste from the recycling of paper and cardboard, PTPC is required to follow all existing regulations for the handling and disposal of any solid and hazardous waste. Ecology does have a pollution prevention program which aims to reduce pollution and waste generation at facilities like PTPC. PTPC is included in this program and wastes generated from the recycling of cardboard would potentially be assessed there.