DI am writing about the proposed Drax wood pellet factory in Longview. One concern of mine is the impact to the air quality in Longview. Since Drax lists their expected total emissions of hazardous air pollutants (HAPS) as 44 tons/year, this would make a major source of pollution for Longview and Cowlitz County. I urge the continued assessment using Maximum Available Control Technologies (MACT) under the Clean Air Act, which SWCAA has failed to provide.

In addition to the Drax pollution is the current updated National Ambient Air Quality Standard which lowers the acceptable levels of PM2.5 pollution from 12 to 9 micrograms per cubic meter. Furthermore, Westrock’s new box manufacturing facility was permitted to increase the levels of PM2.5 to almost 9, leaving no margin for PM2.5 emissions.

The airflow from Longview flows southward toward Vancouver/Portland. I am a resident of Battle Ground, and I don’t want the toxins from Longview manufacturing plants to add to our air quality, particularly during wildfire season. Such toxins as PM2.5 are associated with cardiovascular disease, respiratory problems, aggravation of asthma, adverse impacts on childhood development, and premature death.

Drax’ State Environmental Policy Act needs to be readdressed, and Drax reported Determination of Nonsignificant (DNS) in the SEPA review issued by Cowlitz County should be updated. The Air Discharge Permit application with SWCAA varies from their SEPA application. These differences include exportation of wood pellets using a large number of trucks, rather than the proposal of using ships, as well as the Air Discharge Permit application by Drax suggesting only evaluation of on-site emissions of trucks (not off-site), which will impact the entire community. These large vehicles amount to more than 200 trucks per day which will carry raw materials and remove finished pellets for export.

Another concern of mine involves Drax’ proposal of a fuel conversion facility which would process massive amounts of woody biomass, primarily sawdust, into wood pellets, with the goal of exporting 490,000 tons of pellets per year. This qualifies Drax as a fuel conversion facility, and it should be evaluated accordingly, with more stringent emissions review than SWCAA has performed.

Elsewhere in the US, pellet mills have been subject to massive fines for air pollution. This should be a red flag warning to prevent this facility from being built in the first place. As an example, in the late 2020 Drax was fined $3.5 M by Mississippi’s DEQ for emitting 3 times the volume of toxic substances as allowed for its plant. In 2022, Louisiana’s DEQ fined Drax for excess release of Volatile Organic Compounds (VOCs) from two operations totaling $3.2 M. This Louisiana plant was only permitted to emit less than 250 tons of VOCs per year; however, it has emitted more than 1,100 tons per year.

Can we expect Drax to continue to emit excessive amounts of toxins in their proposed Longview plant? The answer is unequivocally yes!

Let us also consider the severe noise impact of the plant. The noise levels from four hammer mills at 100db apiece will operate 24/7. Furthermore, Drax claimed to source its wood pellets from forest residuals; however, documented use of whole logs has been noted. Drax’s Longview facility would have a significant impact on the regional forest economy, reducing the number of trees providing shade and sequestering carbon.

I urge you to deny the air discharge permit and stop the Drax facility in Longview.

Thank you for the opportunity to comment.