

ORCAA Responses McKinley Mill Modifications, 19NOC1327

August 27, 2019

Robert Sextro (via email 6/27/2019)

...I see in 19NOC1327 that McKinley said and you agree that the cogeneration unit is not part of this NOC because air emissions "will not change".

please clarify, will the cogen unit go through a "startup" period followed by source testing? will there be a re-issued/revised source test plan provide to ORCAA? is this a late summer or fall timeline??.

ORCAA Response

The biomass boiler for the cogeneration plant will go through a startup period. Source testing of the boiler will resume per McKinley's Air Operating Permit (AOP). Condition M40 requires annual testing. According to the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD, commonly known as the "Boiler MACT) testing is required within 180 days from start-up of the boiler. A new source test plan will be required.

Darlene Schanfald (via email 8/1/2019)

ORCAA Preliminary Recommendation - New Permit Action for McKinley Mill, Port Angeles WA

Protect the Peninsula's Future, Olympic Environmental Council, and Sierra Club's North Olympic Group, all recognized nonprofits, submit these comments for the public hearing opportunity.

According to the released documents, it appears that the Mill will take steps to use considerably less water and energy than previous mills at this site had. This is a positive, especially given global warming and potential future impacts to the Elwha River ecosystem. McKinley claims their new equipment will not increase air emissions.

McKinley will be replacing the steam turbine and improving reliability of the existing cogeneration plant biomass boiler by blocking off boiler tubes and making other modifications... Both types of turbines use steam from the boiler to drive a generator and do not emit air contaminants directly. The project will also reduce water consumption at the mill; minor physical and operational changes may be required at the existing wastewater treatment plant but not are expected to result in an increase of air emissions.

Question: What agency oversight will there be? Mills typically self report.

An EPA Office of Inspector General Report, released 30 July 2019, registered concerns about stack testing reports.

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https://www.epa.gov/sites/production/files/2019-07/documents/_epaig_20190730-19-p-0251_glance.pdf

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Our audit of 30 stack test reports from state and local agencies in Washington state found numerous examples of nonadherence to EPA test methods and inadequate supporting documentation to assess data quality. These problems were not identified by state and local regulatory agencies responsible for implementing Clean Air Act permitting programs in Washington state.

We also found that some state and local agencies rarely observe stack tests to verify that EPA methods are properly followed. Several agencies told us that they needed additional training and tools from the EPA to help them conduct oversight of stack testing and reporting.

How will ORCAA respond to the concerns of the OIG? How will ORCAA know if air contaminant emissions are increased?

Please explain.

In the same vein, there will be more diesel-fueled trucks hauling materials to the mill. Will ORCAA, or another entity, measure ambient air quality before the mill starts up and during mill operations along the trucking routes?

We are glad to know that McKinley will not be producing water- and grease-proof materials. That would be a PFAs concern, a long-life contaminant resistible to breakdown and harmful to human health. We raise the recycling issue about chlorine-based paper and clay and de-inking from recycled paper.

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Prepared June 10, 2019

Sludge from the secondary clarifier contains a high percentage of fiber fines. The recycled paper plant sludge consists of fiber fines, clay and ink from the waste-paper.

Operation and emissions from Cogen boiler are generally covered under a different permit, but as stated on Page 7: "[Cogen boiler] combusts wood-derived fuel, distillate fuel (startup only), and minor amounts of dewatered sludge from the Mill's wastewater treatment plant." and " Since the boiler first began operating, about 5 percent of the fuel (on a heat value basis) combusted has been clarifier sludge from the on-site wastewater treatment plant." The cogeneration plant was permitted by ORCAA in 2011 (10NOC763) and began operating in 2014. The cogeneration plant biomass boiler is regulated as Emissions Unit 8 (EU8) under the Mill's current AOP.

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The cogeneration plant cooling towers are regulated separately as Emissions Unit 9 (EU9).

Changes in effluent makeup from changes in source material makeup will certainly impact outputs of clarifier (changing relative ratios of combustible fiber fines to clays and inks) and when dewatered and burned this will almost certainly impact emissions from cogen boiler, but these impacts are not discussed.

The modifications will enable production of new, heavier paper grades, and will increase the gross production capacity of the Mill from 800 to 840 air-dried tons per day (ADT/day), representing a 40 ADT/day increase. As a result, emissions of certain air pollutants from the recycle pulp plant and paper machines will increase compared to historical baseline emissions. Therefore, the changes qualify as “modifications” and trigger the requirement to secure ORCAA’s approval of a NOC application prior to commencing the Project.

The Approval Order issued by ORCAA will include emissions limitations and work practice standards to assure ongoing maintenance of tBACT in the future.

QUESTION: Please detail the work practice standards and, additionally if any citizen protection is provided from the polluting emissions? And please state if these are for short-term exposures (e.g. 24 hours) or over an extended time period.

Emissions Limits: The following limits apply:

a. Toxic Air Pollutant Limits - Combined emissions from the single-line

continuous recycle pulp plant and paper machines, as determined based on ORCAA-approved emissions factors and actual production rates, shall not exceed the following limits over any continuous 12-month period:

Pollutant	Recycle Pulper	Paper Machines
Acetaldehyde (lbs/yr)	423.4	3,170
Chloroform (lbs/yr)	18.2	1,230
Formaldehyde (lbs/yr)	50.4	3,190
Methylene Chloride (lbs/yr)	61.3	947

b. Volatile Organic Compound (VOC) Limit: Approval of either a

Prevention of Significant Deterioration (PSD) application per WAC 173- 400-720 or a determination by the Washington Department of Ecology that PSD does not apply is required if combined emissions from the single-line continuous recycle pulp plant and paper machines, as determined based on ORCAA-approved emissions factors and actual production rates exceed 70.7 tons per any continuous 12-month period.

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[Regulatory Basis: ORCAA Rule 6.1.2(l) and WAC 173-400-720(4)(b)(iii)(D)(ii) through (v)]

Over the years, from 1990 through 2008, information was gathered about air emissions from the Daishowa, Kply and Rayonier mills. Mill plume emissions and citizen complaints were coordinated from 1990 - 1995 by the Clean Air Hotline (CAH). WA State Department of Health and Protect the Peninsula's Future (PPF) determined sub census area death rates in Port Angeles and adjoining county acreage for the 1990s. These perfectly matched the CAH call-density data. In 2008, the WA State Department of Ecology modeled air emissions from the three mills for the purpose of designating offsite-soil contamination PRP responsibility under the Model Toxic Control Authority (MTCA). This perfectly correlated with the CAH mapped call in sites and the DOH-PPF death data. The western Harbor Daishowa emissions scored as one of the highest polluting sites under all three studies. Rayonier Mill Off-Property Soil Dioxin Study, July 2011.

We are pleased to read the following protection for the ONP:

Because the Mill is located within 10 km of a designated Class I Area, the Olympic National Park, PSD [Prevention of Significant Deterioration] regulations require that air dispersion modeling be conducted for NSR regulated pollutants. Any emissions rate or any net emissions increase associated with this project with an impact on the Olympic National Park equal to or greater than 1 µg/m³, (24-hour average) will be deemed "significant."

Later a document summarizes::

3.0 SUMMARY P. 1 from Ramboll: Because the project emission increases for all NSR pollutants are below the SER [Significant Emission Rate], and the modeled maximum 24-hour impacts due to project NSR [New Source Review] emissions increases are below the "significant" threshold of 1 µg/m³, the Stock Preparation project is not subject to PSD review for any pollutant.

However, modeling is one thing, nature is another. Significant winds could produce emission rates other than those predicted by modeling.

QUESTIONS: Given the historic data on the high levels of pollutants emanated from the former mill at this site, will there be a system to measure actual emissions at different points in the Park? If so, beyond the particulate size and amount, will that be broken down into type of contaminant?

McKinley Paper Company Health Impact Assessment Report and agencies' conclusions are of concern.

3.2 Atmospheric Fate Generally, formaldehyde, is not persistent in air. Formaldehyde reacts with other chemicals in air (mainly sunlight-derived radicals) and is removed via direct photolysis and oxidation. The breakdown products of formaldehyde include formic acid and carbon monoxide. Methylene chloride readily evaporates and the majority releases into the air. Methylene chloride is broken down by chemicals generated in sunlight.

3.3 Terrestrial Fate Formaldehyde is biodegraded in soil in a relatively short time. Methylene chloride loosely attaches to soil particles but often moves from the soil and into the air.

3.4 Aquatic Fate Over a few days, formaldehyde will biodegrade to low levels when released to water. Methylene chloride does not easily dissolve in water; in an aqueous setting, the half-life ranges from about 1 to 6 days, with assistance from other chemicals and bacteria.

9.2 Conclusions

Our conclusions, based on the results from the risk characterization as well as the uncertainties explained above, are presented for the non-cancer hazards and the cancer risks.

9.2.1 Non-Cancer Hazards

Based on the risk characterization, acute (1-hour and 8-hour) health effects are not of concern for the McKinley Paper Company facility. The hazard quotients at the maximum impact receptor is less than one. Similarly, the annual hazard indices for the facility-only and cumulative scenarios do not exceed one.

9.2.2 Cancer Risks

The sum of the increased cancer risks from TAP emissions attributable to the project does not exceed 10 per million for the MIR, MIRR, MIBR, or MICR, which is the acceptable cancer risk threshold provided by Ecology in WAC 173-460-090(7).

Conclusions and Recommendation

The [Ecology] project review team concludes that the HIA [Health Impact Assessment] presents an appropriate estimate of potential increased health risks posed by McKinley's TAP [Toxic Air Pollutants] emissions. Increased formaldehyde emissions could result in an increased cancer risk of up to 0.9 per million for the MICR located east of McKinley. This risk was calculated assuming workers are exposed eight hours per day, 250 days per year for 40 years. Increased cancer risk to nearby residential and boundary receptors is lower (0.02 and 0.2, respectively). These risks fall below Ecology's threshold of maximum acceptable risk (i.e., one per one hundred thousand or 10 per million) as defined in Chapter 173-460 WAC.

Acute eye and upper respiratory tract irritation hazards are not likely to occur at any off-site location. Chronic long-term exposure to McKinley's project-related formaldehyde increased emissions is not likely to cause or appreciably contribute to adverse health effects.

In summary, McKinley's TAP emissions are unlikely to result in excessive cancer risk or in any significant adverse non-cancer health problems to people at nearby residences or commercial locations. The increased risks from the proposed project are permissible because they fall within the limits defined in WAC 173-460-090(7). Based on our analysis, the Washington State Department of Ecology finds that the applicant, McKinley, has satisfied all requirements for approval of the second tier petition. The risk manager may recommend approval of the proposed project because project-related health risks are permissible under WAC 173-460-090(7).

Last, but not least, inclusion of the Marbled Murrelet, which has federal listing: Threatened and State listing: Endangered (WA, OR, CA), was not included in the SEPA. It's two listings should trigger state and federal agency review, should it not?.

ORCAA Responses

1. What agency oversight will there be?

ORCAA conducts full compliance evaluations (FCE) of all "major sources" of air pollution annually, which includes McKinley Paper in Port Angeles. FCE's always involve an on-site inspection which is typically completed within one to three days and involves inspecting each air emissions unit, operating conditions, control devices, continuous emissions monitoring systems, fuels and on-site records. FCE's are followed by evaluating observations and data gathered during the FCE site visit and culminated by a written report of observations and findings. The facility owner is provided notice of findings.

In addition to an annual FCE, ORCAA performs the following oversight:

- Complaint response;
- Review of semiannual monitoring reports and annual compliance certifications by McKinley;
- Review and approval of stack testing protocols;
- Observes all stack emissions testing;
- Reviews and renews McKinley's Air Operating Permit renewal every five years;

ORCAA is a regulatory agency with enforcement authority. ORCAA's authority includes ability to issue Regulatory Orders and Notices of Violation subject to penalties. In worst case situations, when either violations are severe or public health and safety is in jeopardy, ORCAA may take action to shut down a source of emissions. The type of enforcement action ORCAA takes depends on circumstances and severity of a violation

and could range from a simple verbal warning to a formal Notice of Violation. In extreme cases, ORCAA has taken action to shut a facility down.

2. How will ORCAA respond to concerns regarding stack testing raised in the EPA Office of Inspector General Report (OIG), released 30 July 2019?

ORCAA intends to improve their oversight and regulation of stack testing by participating in stack testing training offered by EPA and by increasing efforts in the areas of stack testing protocol review, stack testing observation and review of stack testing reports.

It is noteworthy to point out that the OIG report found ORCAA is the top agency with respect to observing stack testing within its jurisdiction. ORCAA was present and observed 100% of the stack tests conducted within its jurisdiction over the period of time reviewed by OIG.

3. How will ORCAA know if air contaminant emissions are increased?

Through annual stack testing, continuous monitoring systems (CMS) and operating records. CMS, including Continuous Emissions Monitoring Systems (CEMS), automatically store data electronically. This data is available to ORCAA at any time upon request and gets reported to ORCAA semiannually. McKinley is also required to submit an emissions inventory annually, which is reviewed by ORCAA for accuracy.

4. Will ORCAA, or another entity, measure ambient air quality before the mill starts up and during mill operations along the trucking routes?

ORCAA operates an ambient air monitor at E. 5th Street in Port Angeles. This monitor has been in continuous operation since May 9, 2015.

5. Changes in effluent makeup from changes in source material makeup will certainly impact outputs of clarifier (changing relative ratios of combustible fiber fines to clays and inks) and when dewatered and burned this will almost certainly impact emissions from cogen boiler, but these impacts are not discussed.

ORCAA concluded the opposite. Due to elimination of bleaching, elimination of the de-inking plant and OCC pulper, and use of more efficient pulping equipment, less fiber and other solids will end up in the clarifier sludge.

6. Please detail the work practice standards and, additionally if any citizen protection is provided from the polluting emissions?

The pulping plant proposed results in less air emissions per ton of pulp produced through the following mechanisms:

- No bleaching – no sulfur compounds used in pulping process
- Elimination of de-inking plant and mechanical refiners by converting to a 100% recycle pulp plant
- Conversion to continuous pulping system

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Protection of public health and welfare with respect to air quality is required under the Washington Clean Air Act and is the mission of ORCAA. Protection is provided in the following ways:

1. ORCAA can only recommend approval of an air permit for a new facility or modification if it finds air quality is protected and the proposed project will comply with all applicable air regulations and standards. This was the conclusion for McKinley;
2. ORCAA inspects existing sources of air pollution and enforces violations;
3. ORCAA monitors pollutant loadings in all counties within its jurisdiction by compiling an annual emissions inventory; and
4. ORCAA monitors ambient air quality.

5. And please state if these are for short-term exposures (e.g. 24 hours) or over an extended time period.

Emissions and impacts which are evaluated against each applicable standard are based on the “worst case” emissions continuously over the averaging period of the standard. Actual emissions are expected to be less than the worst case rates used for compliance evaluation.

6. Given the historic data on the high levels of pollutants emanated from the former mill at this site, will there be a system to measure “actual emissions” at different points in the Park?

Emission rates and concentrations from the McKinley boiler stack are continuously monitored, which is a measure of the amount of pollution coming out of the McKinley boiler stack at an elevation of over 100 feet from sea level. Ambient air quality in Port Angeles is monitored by ORCAA. In addition to ORCAA’s ambient monitor, Olympic National Park operates an ambient monitor just outside the Park near Blyn.

7. If so, beyond the particulate size and amount, will that be broken down into type of contaminant?

No. The make-up of particulate in the Port Angeles area has already been studied. Elevated particulate concentrations in Port Angeles including ultra-fine particulate concentrations were found to be a result of either wildfires or increased wood stove use, not emissions from the Nippon now McKinley facility. For more information on ORCAA’s Ultrafine Particulate Study, go here: <https://www.orcaa.org/air-quality/air-monitoring-projects-history/ultrafine-study/>

The IMPROVE air monitoring operated by the NPS speciates the PM2.5. Information about the IMPROVE network and air quality data can be found here: <http://vista.cira.colostate.edu/Improve/>

8. The Marbled Murrelet, which has federal listing: Threatened and State listing: Endangered (WA, OR, CA), was not included in the SEPA. It’s two listings should trigger state and federal agency review, should it not?.

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Consideration of threatened or endangered species is outside the scope of requirements for review and approval of a Notice of Construction (NOC) application.

Judith Broadhurst (emailed August 1, 2019)

Psychologists say the best predictor of future behavior is past behavior. So far, McKinley, a Mexican-owned company, has not honored what they have said.

They said they would begin operations at the paper mill by April 1, 2017. Then they said 2018, and then September 2019. Now they say by December 31, 2019. And by the way: In 2017, McKinley also applied for an exemption to the wastewater pollution check, which affects fish.

According to what I've read in the PDN, they currently employ only 14 people. They said last month that they planned to immediately hire 15 of 33 positions, but even long-term, they have not said that they'll employ more than 120 people. This is a town of 20,000 people.

Now they want, and have preliminary approval from the state Ecology department, for an exception to increase air pollution. This is the state Ecology dept that has told us about every 2 years that they need 2 more years to even come up with a plan to make Rayonier finish cleaning up the toxic waste they left on the other side of our harbor 23 years ago!

Letting McKinley pollute our air even more will harm all who live and work here in 4 key ways. It will:

1. Increase risk of respiratory disease and cancer to residents – any increased risk is too much
2. Decrease success of our downtown businesses and the waterfront development plan
3. Lower property values for anyone who owns a home or business property in Port Angeles
4. Lessen the enjoyment of the outdoors and quality of life of all who live, work, and visit PA

As a psychology major in both undergraduate and grad school, I learned another theory that always holds true: Festinger's Theory of Cognitive Dissonance essentially says that you cannot hold two beliefs that contradict each other. You must drop or change one or the other.

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We already have the Rayonier fenced-off toxic waste site on one side of our waterfront. So how do you reconcile authorizing even more industrial pollution on the other side?

Increased air and water pollution are contradictory to success and all of the hope, money, and time we're investing in the waterfront and historic district downtown: the performing arts and conference center, the 4-star hotel and restaurants, and the new Marine Discovery Center.

Remember: McKinley has said they might, someday, offer up to 120 jobs. Might. Someday.

How can we believe them when they haven't honored anything they've promised so far? How can we reconcile their history of not honoring their commitments with the multiple detrimental effects that their air, water, and noise pollution will have on the success of that downtown and waterfront business investment and on the health, property values, and quality of life of 20,000 residents, not even counting the visitors who bolster our economy?

We could do a lot of great things with that property, things that would benefit our town a lot more and offer far more jobs. Haven't we learned the lesson from what Rayonier did to PA? Let's not let it happen again..

ORCAA Response

ORCAA understands your sentiment that, "any increased risk is too much." However, laws and regulations in Washington do establish acceptable levels of increased health risk from new projects. McKinley's air emissions were evaluated by the Washington Department of Ecology and found to be within these acceptable levels.

The maximum increase in cancer risk allowed is 10 in one million [per WAC 173-460-090(7)]. The maximum increased cancer risk from McKinley's proposed mill upgrades was determined to be 0.9 in one million at neighboring commercial properties. The maximum increased cancer risk to the Port Angeles community was determined to be 0.02 in one million. Both results are well below the acceptable maximum of 10 in one million.

Regarding the state of air quality in Port Angeles, the air quality in Port Angeles is "good" during most of the year. Episodes of "moderate" to "unhealthy" air quality do occur. These episodes have always been associated with either wildfire events or increased woodstove use during an air stagnation period.

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The most effective means to improve air quality in Port Angeles and reduce the health risks of air pollution is to reduce open burning and woodstove use in the region.

Marolee Smith (oral comments, August 1, 2019)

Right now we have zero air pollution coming off there and it is kinda nice since we've had this prevailing winds all summer from the west to the east. I realize that this is a different system, but I would like to know what scrubbers and precipitators are going to be added which would really cut down on the effluent in the air. I don't hear anything about that.

As well, I would really like to know what chemicals will be release, because, as you said there might be less chemicals and different chemicals, but it would be nice to know what the those are and what they'll smell like. And that is something that I keep asking and nobody seems to be able to answer. Which really bothers me, because I think that that would be something that McKinley would be raving about what a wonderful nontoxic situation they will be putting in Port Angeles.

Port Angeles needs to turn around. It's not going to turn around by having a factory. It's not going to turn around by having a mill, you know Port Angeles is trying to rediscover itself, is this really the way we want to go, I think that is the real question.

ORCAA Responses

No scrubbers or precipitators are proposed for McKinley's paper machines or pulp plant. Air pollution from these areas of the mill will be prevented through the following means:

- Eliminating bleaching – no sulfur compounds used in pulping process
- Eliminating the de-inking plant and mechanical refiners
- Converting the pulping system to a continuous, recycle pulping system, which emits less air pollution per ton of pulp produced.

McKinley's existing cogeneration plant boiler uses the following air pollution controls:

- Selective non-catalytic reduction system (SNCR) for control of NOx
- Electrostatic Precipitator (ESP) for control of particulate
- Condensing economizer for control of acid gases and particulate

Regarding the chemicals that will be released, Table 4 from the Preliminary Recommendation lists them along with annual change in emission rates due to the proposed project:

Table 4: Projected Change in Emissions (annual)

Pollutant	Units	Recycle Pulp Plant	Paper Machines
PM 2.5	tons/year	0.00E+00	2.00E+00
PM10		0.00E+00	2.90E+00
PM		0.00E+00	3.20E+00
SO2		-7.89E+01	0.00E+00
NOx		0.00E+00	0.00E+00
CO		0.00E+00	0.00E+00
VOC		-1.70E+01	4.28E+01
Lead		0.00E+00	0.00E+00
Acetaldehyde	pounds/year	-4.01E+03	-3.17E+02
Carbon Disulfide		4.41E+02	2.75E+02
Chloroform		-1.46E+03	1.06E+03
Cumene		-6.07E+02	4.30E+02
Formaldehyde		-1.05E+03	1.87E+03
Methanol		-2.22E+04	-2.24E+04
Methyl Ethyl Ketone		-2.29E+03	-5.43E+02
Methylene Chloride		-7.37E+00	7.43E+02
Naphthalene		-2.35E+03	-3.02E+02
Phenol		-6.06E+03	-8.29E+03
Toluene		2.71E+01	4.81E+03

Regarding odors, projected worst case ambient concentrations are less than odor detection thresholds for the two pollutants emitted at rates above their respective significance emission rate levels: formaldehyde and methylene chloride. ORCAA conclusion is that odors from the project will not be detectible off the property of the mill site.

Eulihia Engel (oral comments, August 1, 2019)

I just want to say, yeh I am all for updating this technology and it, it sounds really good on, you know on paper. But if this affects the air quality of downtown, if, you know, like Marolee is saying, like what is this going to smell like just, you know just because there is less chemicals are they different chemicals, you know this is going to be a huge hit to our economy.

You know, my generation, we are already struggling. I've been working a manufacturing job in Clallam County for 3 years and wages were so stagnant we had just, you know, almost 8 people walk out of the factory just this month because nobody's getting raises. So it's like you are selling us on jobs, but are they just more

low paying jobs, that you know, barely keep family off social services. And, in exchange for, you know, what? And so, you know then the other jobs are service industry jobs, that's huge downtown you know. Everyone in my generation, a lot of people are service industry workers. Tourism is a huge thing, if this effects tourism, you know, um, already from last year to this year, I've talked to a lot of people who are servers and they can look at their pay stubs and are like yeh last year was so much better, this year is like people are scared. And, you know I mean, if, if this does (unknown word) effects air quality of downtown we're making a huge mistake, we do have to start thinking for the future. My generation already has so many problems we have to clean up, that like, a lot of us have felt like giving up. And if you look around you, and you look at the, the delusion-et in like people's faces, that's where it is coming from, so you know, like I said it sounds great on paper, but let's ask some hard questions because if this affects the air quality of downtown and people can smell it, people are going to turn away and we're, we're ending up worse off. So, let's celebrate our heritage, let's celebrate this place, our history. You know, that mill, that mill sits on top of an archeological site that predates, you know, the, Jesus Christ. You know, that's something to be celebrated. That's awesome, people would come from hundreds of miles if that was, you know, a park in a nice setting and a museum, you know. Let's celebrate that, let's celebrate going into the future, not clinging to the past, let's rebuild the mills, you know we can't do that anymore, we have to work together and move forward. So I just hope everyone consider that..

ORCAA Responses

ORCAA conclusion is that odors from the project will not be detectible off the property of the mill site. This conclusion is based on a modeling analysis and predicted ambient impacts being several orders of magnitude less than odor detection threshold for formaldehyde and methylene chloride.

Betty Fraser (received via email on August 2, 2019)

I have read the proposals and recommendations from your web site. Given the positive changes being made by McKinley at the factory, and improvements in their processes, I do understand your team's recommendation. Also, as a Port Angeles resident, I understand the importance of good paying jobs in our community.

But I admit that my hesitancy is really around the wording and positioning of last night's presentation. When it states yes the plant will increase air pollution, but not to worry it within the federal standards. Ms. McNair, this rings hollow to the general public. Just to what degree will the increase be, versus our current air quality today? It's all about the context, just what and by how much makes a more concrete compelling statement of change. To state there will be odors at the plant, but not how those odors will affect the city, in feet or miles again this is an empty assurance.

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Let's all remember the people of Michigan, who were told their water met the federal standards for years, when in fact it did not.

Last night we had the opportunity to hear of your reporting & quality assurance measures. I believe those points are going to be essential in the communication to the community. It is important to know who is our watchdog (ORCAA) is this whole project. Also the processes the community should follow should there be any issues with regard to air quality, smells, water, etc. is crucial to gaining community buy-in..

ORCAA Responses

Table 4 from the Preliminary Recommendation published by ORCAA clearly states the magnitude of expected emissions increases (Table 4 is shown above). In addition to annual inspections and stack testing, ORCAA compiles an annual emissions inventory and operates an ambient monitor in Port Angeles. Through these combined efforts the good ambient air quality of Port Angeles is protected. More detail in each of these areas is available from ORCAA's website or by inquiring with ORCAA directly:

- For current air quality information throughout ORCAA's region, go here: <https://www.orcaa.org/air-quality/current-air-quality/>
- For information on McKinley's Air Operating Permit or of the program in general, go here: <https://www.orcaa.org/permit-programs/air-quality-permitting/air-operating-permit-aop-program/>
- For inspection reports, please call or email ORCAA directly.