



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 6, 2019

Mark Goodin
Olympic Region Clean Air Agency
2940 Limited Lane NW
Olympia, WA 98502

Re: Second Tier Petition by McKinley Paper Company

Dear Mark Goodin:

The Washington Department of Ecology's Air Quality Program (Ecology) has completed a review of health risks from increased formaldehyde emissions at McKinley Paper Company (McKinley) in Port Angeles, WA. Ecology concluded that the health risk is acceptable and recommends approval of the project.

McKinley proposes changes to their facility which will allow them to make heavier and stronger grades of paper and increase their gross production capacity. These changes result in an increase in estimated emissions of formaldehyde that triggered the need for a health impact assessment (i.e., second tier review).

Based on Ecology's review of the health impact assessment, increased formaldehyde emissions resulted in a maximum increase lifetime cancer risk of about 0.9 in one million. The maximum increased risk was estimated for workers at a neighboring commercial property. Risks to Port Angeles residents are much lower. McKinley's increased emissions will not likely contribute to long- or short-term health hazards in the community.

Ecology recommends approval of the project because:

- Ecology determined that the emission controls for the new and modified emission units represent best available control technology for toxics.
- The applicant demonstrated that the increase in emissions of toxic air pollutants is not likely to result in an increased cancer risk of more than one in one hundred thousand (10 in one million) which is the maximum risk allowed by a second tier review, and
- Ecology determined that the non-cancer hazard is acceptable.

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This project has satisfied all requirements of second tier review under WAC 173-460-090. Ecology recommends that you incorporate our findings as part of your ambient air impacts analysis and you may begin the public comment period when you are ready to do so.

If you would like to discuss this project further, please contact Gary Palcisko at 360-407-7338 or gary.palcisko@ecy.wa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "CH Hanlon-Meyer", is placed over a light blue rectangular background.

Chris Hanlon-Meyer
Science and Engineering Section Manager
Air Quality Program

Enclosure

cc: Lanka DeSilva, Ramboll
Fran McNair, ORCAA
Terry Nishimoto, McKinley Paper Company
Annika Wallendahl, Sound Earth Strategies, Inc.