
A Guide to Protecting Your Community from Industrial Wood Pellet Plants



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Photo credit: The Rev. Michael Malcom / People's Justice Council

What is this guidebook?

Industrial wood pellet manufacturers have recently set their sights on Washington State. These large-scale manufactures turn wood into pellets (often referred to as “biomass”), which are shipped overseas and burned for energy. Industrial wood pellet manufacturers claim that wood pellets are a “clean and green” source of power because forests can regrow—a claim that has allowed these companies to receive millions in government subsidies for clean energy projects.

But the truth is that making wood pellets on an industrial scale is harmful at global, regional, and local levels:

- burning millions of tons of wood pellets spews climate-harming greenhouse gases into our atmosphere¹;
- industrial wood pellet manufacturing can and has fueled the destruction of surrounding forests²;
- and local communities suffer from serious pollution and noise from industrial wood pellet plants.

For years, large, industrial wood pellet manufacturing plants have operated in the Southeastern part of the United States and in British Columbia, Canada. People living near these facilities have been exposed to a constant stream of wood dust and other harmful air pollutants³. These air pollutants can cause asthma and other serious health issues. Early studies also show that neighborhoods with large wood pellet manufacturing plants experience more air pollution and noise than neighborhoods without them⁴. The harm to these neighboring communities has been so significant that the United States Environmental Protection Agency (EPA) launched an investigation into the effects of wood pellet production on air, water, and community health⁵.

Industrial wood pellet manufacturers have targeted Washington because of the state’s forests and accessibility to markets in Asia through coastal ports.

This guidebook was created to help give communities the tools to recognize the warning signs of a proposed facility, understand the industry’s false “green” claims, and act early to ensure that your community is protected.

THIS GUIDE WILL HELP YOU:

- Understand what a wood pellet facility is and how it works.
- Learn how these facilities can harm public health and the environment.
- Hear directly from communities affected by wood pellet facilities.
- Know the steps a company must take before it can build a wood pellet plant.
- Learn how to stay informed and get involved if a wood pellet facility is planned in your community.

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PART ONE

Background On The Wood Pellet Industry

What are wood pellets?



Picture of wood pellets. Photo Credit / Dogwood Alliance

Wood pellets are small, cylinder shaped bits of compressed wood pieces.

To create wood pellets, wood is taken from forests, chipped into small pieces, and dried using extreme heat. Those small pieces are then pounded into fine dust. The dust is compressed into small pellets that can be burned for energy.

What is an industrial wood pellet plant?



Pictured here is the Enviva wood pellet plant operating in Ahoskie, North Carolina that produces 410,000 tons of pellets for export to Europe. Photo Credit / See Elizabeth Ouzts, In North Carolina, Wood Pellet Foes See Opportunity In Cooper's Climate Order, ENERGY NEWS NETWORK (Jan. 2, 2019), <https://energynews.us/2019/01/02/in-north-carolina-wood-pellet-foes-see-opportunity-in-coopers-climate-order/>; Enviva, Production Plant Enviva Ahoskie, <https://www.envivabiomass.com/facility/ahoskie-nc/>

A single industrial wood pellet plant typically uses hundreds of thousands of tons of wood per year to create pellets that are shipped to countries in Asia and Europe where they are burned in old coal-fired power plants to make electricity⁶. Medium and large-scale pellet mills produce between 500,000 to 1,100,000 tons of pellets per year—using up to a million or more tons of wet wood⁷. Washington has so far received two proposals to build industrial wood pellet plants in the state:

- (1) Drax, under its subsidiary Pinnacle Renewable Holdings, proposed building a plant in Longview, Washington, that would produce 471,789 metric tons of fuel pellets every year⁸;
- (2) Pacific Northwest Renewable Energy (PNWRE) proposed a plant that would produce 440,800 tons per year in Hoquiam, Washington.⁹

Industrial Wood Pellet Production Process

From Forest to Power Plant

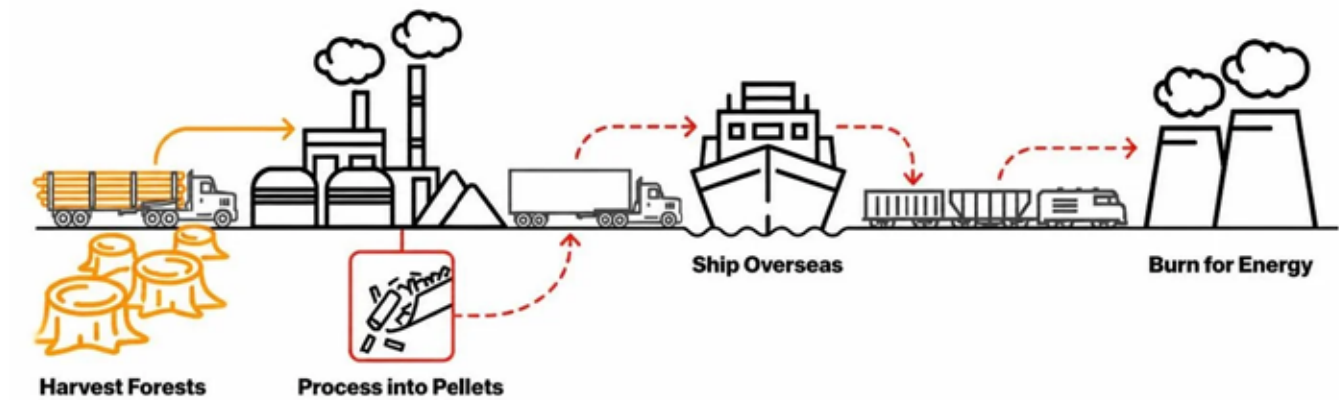


Photo Credit / Southern Environmental Law Center

- 1** Trucks carry wood from forests and sawmills to the pellet plant
- 2** Wood is chipped, dried using high heat, and crushed into fine dust using heavy machinery
- 3** Machines use high temperatures and pressure to shape the wood powder into small pellets.
- 4** The hot pellets are sent to cooling machines to bring their temperature down.
- 5** The cooled pellets are stored in large silos until they are ready to be shipped.
- 6** The pellets are shipped to countries in Asia and Europe.
- 7** The pellets are burned in power plants to make electricity.

Myths vs. facts about the wood pellet industry

Are wood pellets a “clean energy” source? NO.

Wood pellets are not a “clean” or “green” energy source.¹¹ Carbon dioxide is one of the main gases that cause climate change, and we depend on trees to reduce carbon in the atmosphere.¹² Forests are one of nature’s biggest carbon sinks.¹³ Trees absorb carbon dioxide from the air and store it in their trunks, branches, leaves, and soil.¹⁴

Manufacturing wood pellets and burning them for electricity requires the removal of millions of trees. When older, mature trees are cut down, the forest’s ability to clean the air we breathe is reduced.¹⁵ The wood pellet industry and its supporters say that wood pellets are a clean source of energy because trees can be replanted.¹⁶ But here’s the problem: it takes a newly planted tree more than 70 years to absorb as much carbon dioxide as the older tree it replaced and that is much longer than we have to stop climate change.¹⁷

Another problem is that burning wood pellets for electricity actually releases more carbon dioxide into the air than burning coal or natural gas.¹⁸

BOTTOM LINE

Wood pellets are not a clean energy source. Why? Because making wood pellets means cutting down trees, releasing large amounts of pollution into the air to create pellets from the wood, shipping them across the ocean which releases diesel pollution, and burning them to make electricity which releases more air pollutants.

Are wood pellets “carbon neutral”? NO.

Scientists agree that wood pellets are not a “carbon neutral” source of energy.¹⁹ Carbon neutral means that an activity or energy source removes just as much harmful climate-harming gas from the air as it releases. Burning wood pellets for electricity does not do this.

So why do some claim it is carbon neutral? It comes down to a math trick. When some countries and companies calculate the amount of harmful carbon biomass adds to the air, they only look at the carbon released from making the wood pellets. This calculation leaves out two very important things:

- (1) The carbon that is lost when trees are cut down and can no longer remove carbon from the air.
- (2) The amount of carbon that is released into the air when wood pellets are burned for electricity.

Leaving these two things out makes using wood pellets for energy look much cleaner than it really is.²⁰

Can making wood pellets help with forest fires? NO.

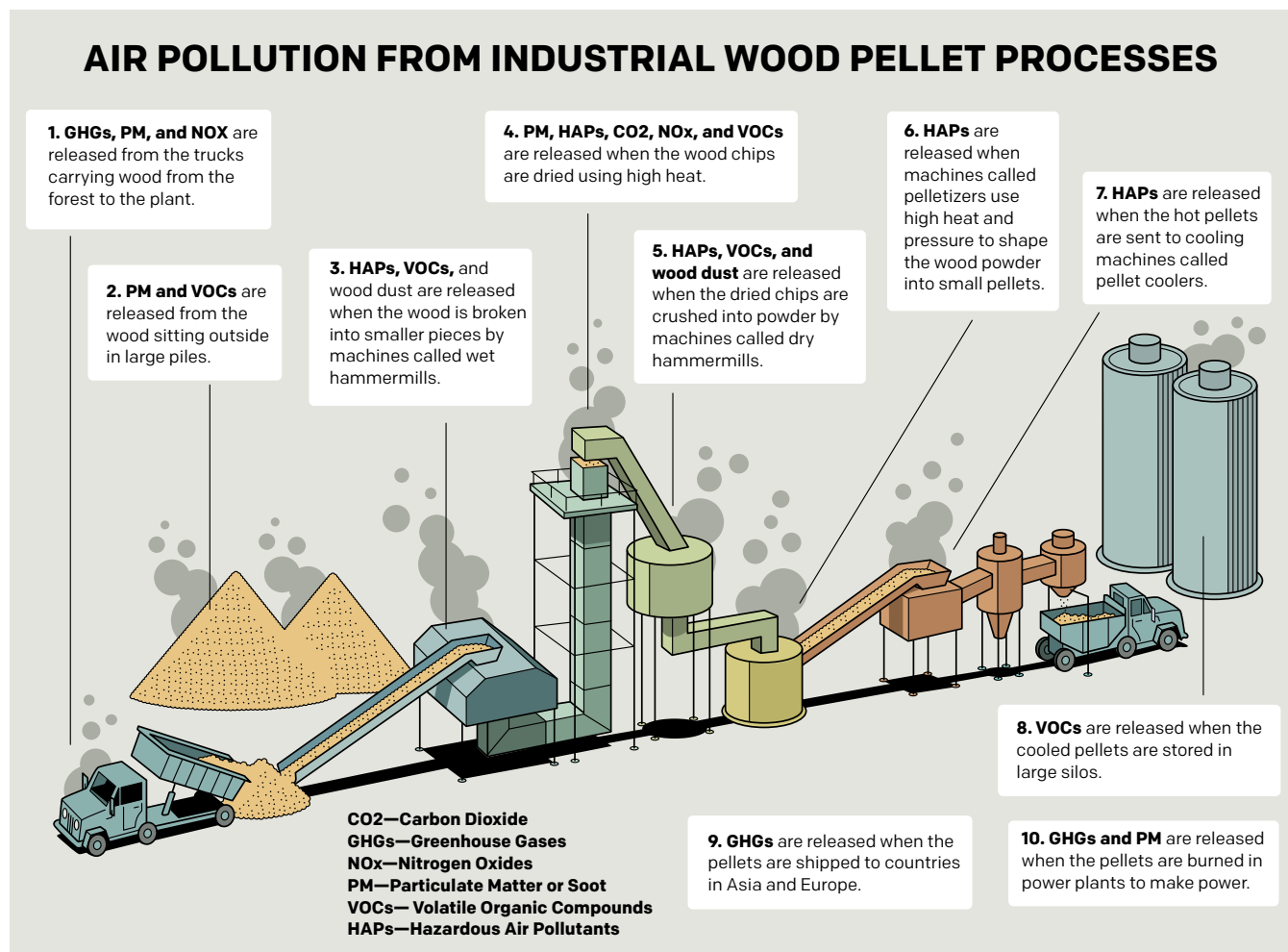
Protecting communities from wildfire risks means investing in things like home hardening, defensible space, and thoughtful forest management—not burning wood from distant forests for dirty energy.²¹ While the best way to prevent wildfires depends on the type of forest, one thing is clear: choices about forest management should be based on what the local ecosystem needs and not on what makes the most money for big businesses. Markets that rely in part on forest residuals risk skewing wildfire interventions towards the most profitable projects rather than those that will provide the best outcomes for community safety and forest health.

PART TWO

How Can An Industrial Wood Pellet Plant Harm Your Health And Your Neighborhood?

Air pollution

Wood pellet facilities release huge amounts of harmful air pollution into nearby communities affecting the daily lives of residents.



A survey developed by the Southern Environmental Law Center (SELC), in partnership with local organizations, found that more than 67 percent of people living within a half mile of pellet mills experience dust every day.²³ The Community Impact survey also found that no matter how far respondents lived from the facility, concerns about air pollution prevent them from regularly doing things outdoors.

“I’m not outside a lot. I used to walk around a lot but stopped once the mill came down. I was recently given an asthma pump for breathing problems,” a resident near Drax’s Amite plant, said.²²

And closer to home, a resident living near a Drax owned facility in British Columbia interviewed by Land and Climate Review described the area as “hav[ing] some of the worst air in the province.”²⁴

Households near pellet plants in the Southeast frequently reported experiencing eye irritation and sinus irritation.

“My eyes burn. I also have mucus in my throat every morning when I wake up,” a person living near the Enviva Sampson plant said. “Dry throat is a constant.”²⁵

What pollutants do wood pellet plants release into the air?

POLLUTANT	POTENTIAL IMPACT
Particulate Matter (PM or Wood Dust)	Wood dust can cause serious health problems including heart attacks, asthma attacks, reduced lung function, trouble breathing and, in the worst cases, early death. ²⁶ Wood dust is especially dangerous for people who already have heart disease or lung disease.
Volatile Organic Compounds (VOCs)	VOCs can create a type of air pollution called ground-level smog. Breathing this can cause wheezing, coughing, asthma attacks, a higher chance of lung infections, and other breathing problems. ²⁷
Hazardous Air Pollutants (HAPs)	HAPs can raise the risk of cancer, cause reproductive issues, and damage the body's immune system, nervous system, and lungs. ²⁸
Nitrogen Oxide (NOx)	NOx can cause damage to the lungs and lead to lung infections and asthma. ²⁹
Carbon Dioxide (CO2)	CO2 contributes to climate change, increasing the frequency and severity of extreme weather events (e.g. more severe storms and heat)



Pellet plants also frequently violate their permits, making them even more dangerous for people living nearby.³⁰

For example, a recent investigation by Land and Climate Review found that Drax owned pellet plants in British Columbia, Canada **violated air permit requirements more than 181 times.**³¹

Picture of car covered in wood dust from Amite Bioenergy Wood Pellet Facility in Gloster, Mississippi. Photo Credit / Jimmy Brown, provided to The Examination, <https://www.theexamination.org/articles/mississippi-drax-air-pollution-health-problems>

Common environmental costs from industrial wood pellet plants include:

Large Increase in Truck Traffic

Industrial wood pellet manufacturers use heavy diesel trucks to drive wood from the forest to the facility for processing. Anywhere between 100 to 200 trucks per day enter and leave these large facilities at all hours of the day, causing increased diesel exhaust, wood dust, and noise.³² Trucks carrying trees to pellet mills also cause traffic problems on the area's roads. In the Community Impact survey, 67 percent of people within a half mile of a pellet mill reported daily traffic. People also connected

truck traffic to noise, poor road conditions, and frequent roadside woody debris.³³

Water Pollution

Pellet mill sites are also associated with contamination of water sources. Pellet plants in British Columbia, for instance, were found responsible for polluting the Endako River with industrial waste. Drax is responsible for wetlands in Alberta being “completely destroyed” at one its facilities.



Overhead view of logs in Enviva Southampton. Photo Credit / Dogwood Alliance.

Noise Pollution

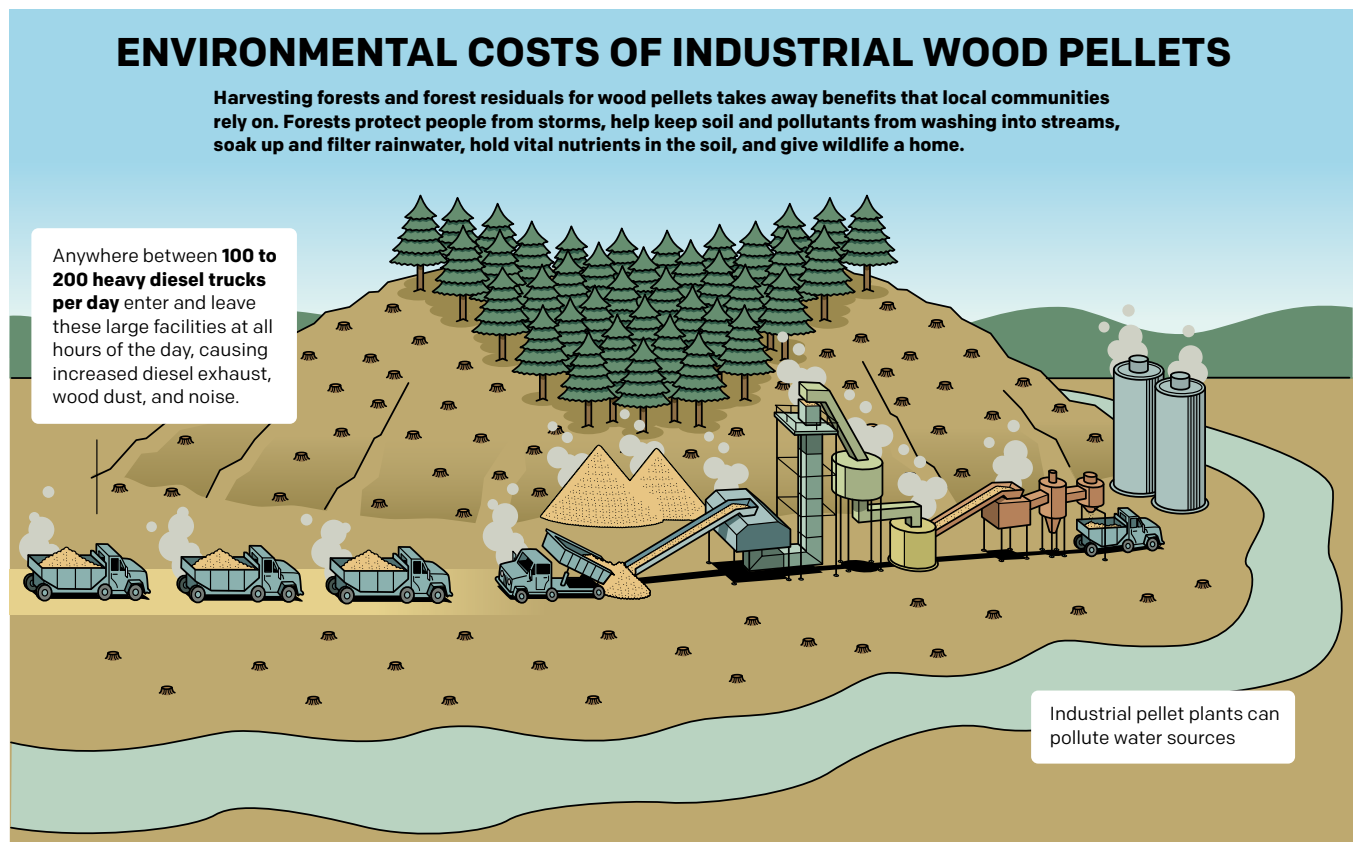
People living near pellet mills are also forced to deal with constant traffic and noise. In the Community Impact survey, nearly 80 percent of families living a half mile from wood pellet facilities reported daily noise that some described as “loud booms,” a “grinding noise,” and “banging” that “sounds like thunder.” The noise was all day long – including at night – making it difficult to sleep.³⁴

Harm to Local Ecosystems

Harvesting forest and forest residuals for wood pellet production diminishes the benefits that forests provide local communities including:

- Protection from increasingly severe storms resulting from climate change.³⁵
- Flood and stormwater control. Trees slow rainwater which prevents sediment runoff, holds soil in place, and helps soils absorb more rainfall. This reduces the load on local drainage systems and decreases the risk of flooding. Deep-rooted trees also support soil structure, reducing the chances of landslides during heavy rains.
- Loss of vital soil nutrients and wildlife habitat when trees are removed.

“I’m not able to go outside because of the dust [or] sleep because of the noise,” said a resident of Garysburg, North Carolina, who lived near Enviva’s Northampton pellet facility.³⁶



PART THREE

Community Voices—Real Stories From Impacted Communities

Longview, Washington



The Drax dome in Longview, WA. Photo Credit / Diane Dick

Community members in Longview, Washington, organized opposition to a U.K. company's proposal to build an industrial-sized wood pellet plant in their neighborhood. This company, Drax, planned to build the plant next to the Port of Longview and export over 450,000 metric tons of wood pellets a year to countries in Asia to burn in old coal plants for energy.³⁷

Drax is a major industrial wood pellet producer that has a history of repeated air emissions violations.³⁸ This history now includes Longview where community members alerted the local air agency that Drax had started construction on its proposed plant before getting its air permit. Community action led the local air agency to investigate and issue a fine against Drax for building without an air permit. In December 2025, Drax shelved its plans for the Longview wood pellet plant.³⁹

Diane Dick, a Longview resident involved in the fight against Drax, says that:

“To fight the proposed pellet plant in Longview, we focused on challenging the air discharge permit, with valuable technical expertise from the Southern Environmental Law Center, and educating and engaging the community on the environmental hazards of the industrial wood pellet industry.”⁴⁰

My home, where I’ve lived for 41 years, overlooks Longview and the industrial area where Drax proposed to build. One afternoon I happened to notice a huge white dome at the Drax site

that hadn’t been there the day before. I took photos and shared with activist peers who passed the information to the air permit regulator. The permitting authority investigated and shut down the construction activity. Our comments on the draft air discharge permit showed the deficiencies that Drax would be required to address. The draft permit was withdrawn with no further action at that time. Without an air discharge permit, Drax could not move forward with their industrial wood pellet production in Longview.”⁴¹

Advice from Diane Dick (Longview, WA):

“Find your people, those who have the same or similar goals. Team up. There may already be groups who know the challenges, with knowledge on specific issues. Reach out to national organizations which often have local chapters. Spending time with and making friends with like-minded folks is an uplifting highlight of my life!”⁴²

“Get to know your community. Learn the state and local regulations which guide project development. Ask questions. Go to governmental meetings just to learn and find out who does what and what’s happening that may never get covered in news media. Research the issues. Build your knowledge and speak out and you will become an effective influencer.”⁴³

Bulkley Valley, British Columbia



Photo Credit / Bulkley Valley Stewardship Coalition

In 2018, Northern Engineered Wood Products (NewPro), which Drax brought (via Pinnacle) in 2021, opened a pellet mill in Bulkley Vally, British Columbia. NewPro claimed that it would manufacture wood pellets using logging wastes and residues in the area, which would reduce the burning of slash piles and associated air pollution.⁴⁴

But the opposite occurred. Instead of using leftover wood for the pellet mill, NewPro/Drax obtained logged trees from the surrounding primary forests as their main source material to create its wood pellets. Meanwhile, the slash piles from logging that NewPro/Drax claimed would be used for wood

Local resident and former longtime provincial Ministry of Environment employee Len Vanderstar says NewPro tricked community members, along with the Smithers town council and provincial government officials charged with determining whether to allow the project to go forward.

Vanderstar has lived in the Bulkley Valley since 1989 and worked as a habitat protection biologist with the provincial government for 25 years before retiring in 2018. He is a director of Bulkley Valley Clean Air Now, a group opposed to slash-burning.⁴⁶

"This air quality concern presents a credible health risk for local residents and undermines the quality of life that makes Smithers and the Bulkley Valley such a desirable place to live," said Vanderstar. The community is worried about the levels of air pollution coming from the pellet mill and the slash burning, including particulate matter (PM 2.5)—a

pollutant associated with respiratory and cardiovascular diseases and cancer."⁴⁷

"One of the local doctors here said that every second kid they're seeing was coming in with asthma attacks," Vanderstar noted. "They're seeing lots of lung disease and even lung cancer in young people in their 40's with no family history and no history of smoking."⁴⁸

Gloster, Mississippi

Drax built its Amite BioEnergy Plant in Gloster, Mississippi in 2016. Since then, it has faced nearly \$3 million in fines from state regulators for repeatedly exceeding legal air pollution limits.⁴⁹ In Gloster, many families live close to the Drax pellet plant, with only a fence separating homes from the facility that pollutes the air, operating 24 hours a day, seven days a week.⁵⁰

In 2023, a health survey of families living within two miles of the Drax wood pellet plant in Gloster found that 95% of surveyed households reported health problems — 55% reported frequent coughing, 75% experienced eye irritation, 66% dealt with nasal issues, 88% suffered from recurring sinus infections, and 64% reported throat irritation.⁵¹



Krystal Martin. Photo Credit / Nico-Hopkins for SELC

Dr. Krystal Martin is a Gloster resident who started advocating against Drax and the Amite facility specifically after multiple hospital visits to treat her mom's respiratory issues.

She now runs Greater Greener Gloster, a grassroots outreach and education initiative that seeks to raise awareness of the harm caused by the Drax facility with the goal of ensuring a better quality of life for the residents of the Gloster community.

"It's disheartening to see that in a small community like mine, we have so many people experiencing health issues with no explanation," says Dr. Martin.

"And it's been hard to convey to people that their illnesses could be from air pollution since it's something you can't even see."⁵²

PART FOUR

What Steps Must Be Completed To Build An Industrial Wood Pellet Plant In Washington?

When a company wants to build an industrial sized wood pellet plant in Washington, federal and state laws require the company to go through several steps. Some of these steps can provide powerful opportunities for the public to voice their concerns and ask government officials to ensure that public health is protected.

Washington State Environmental Policy Act Process (SEPA)

SEPA requires state and local agencies to look at how the project would affect the environment. This process includes looking into:

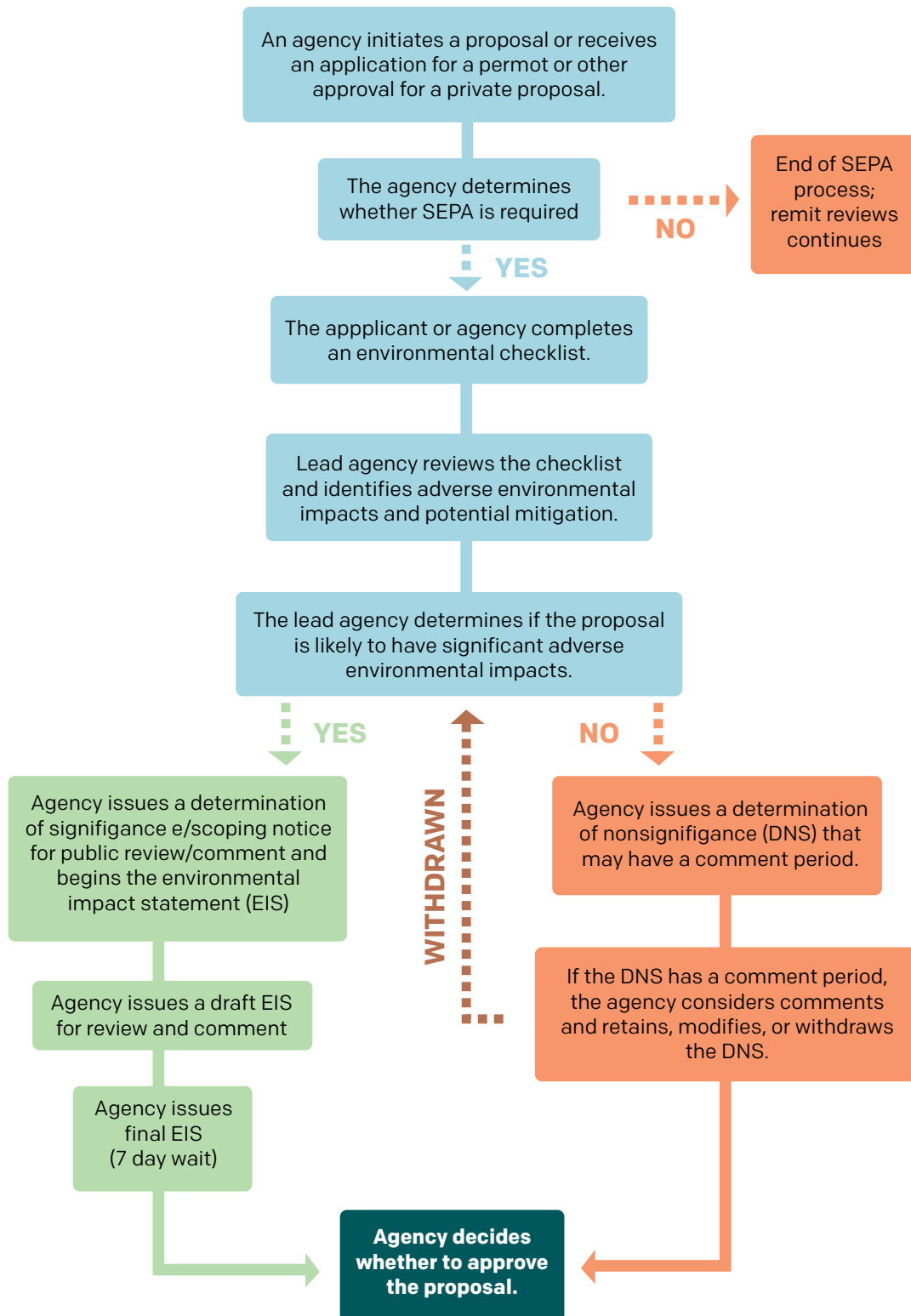
- the project's potential impacts on all elements of the environment (air, water, forests, wildlife, and public health etc.)
- potential alternatives and processes to lessen harmful impacts on the environment.

To do this, the company must submit a SEPA Checklist to the agency responsible for conducting the review. The agency will use the SEPA checklist to help decide what level of review the project requires.

The SEPA checklist review will result in one of the following actions:

ACTION	WHAT DOES THIS ACTION MEAN?
Determination of Non-Significance (DNS)	Agency finds the project will not cause major harm to the environment and the review is complete.
Mitigated Determination of Non-Significance ("MDNS")	Agency finds the project will cause major harm to the environment BUT the harm can be avoided or reduced so that it is minimal. Mitigation measures are spelled out.
Determination of Significance (DS), leading to an Environmental Impact Statement ("EIS")	Agency finds the project will cause significant harm to the environment and the harm cannot be avoided, requiring a more detailed review that looks closely at: • all the environmental impacts; • alternatives to the project; • mitigation.

SEPA review process



Air permitting process

The federal Clean Air Act established a preconstruction permitting program known as New Source Review. Under this program, a company cannot build a new facility that releases air pollution until it gets an air permit, often referred to as a preconstruction permit.⁵³ A preconstruction permit sets limits on how much pollution the facility can release and how it must operate to make sure the facility follows all federal, state, and local air quality requirements that apply.⁵⁴ These permits are issued by state, regional, or local government agencies through plans that the U.S. Environmental Protection Agency (EPA) must approve, known as state implementation plans or SIPs.⁵⁵

In Washington, a company proposing to build an industrial wood pellet plant must fill out an application, called a Notice of Construction (NOC), and submit it to the appropriate air quality agency for approval to get a preconstruction permit. Washington has eight different

air agencies that cover the state (see page 27 of the guidebook).

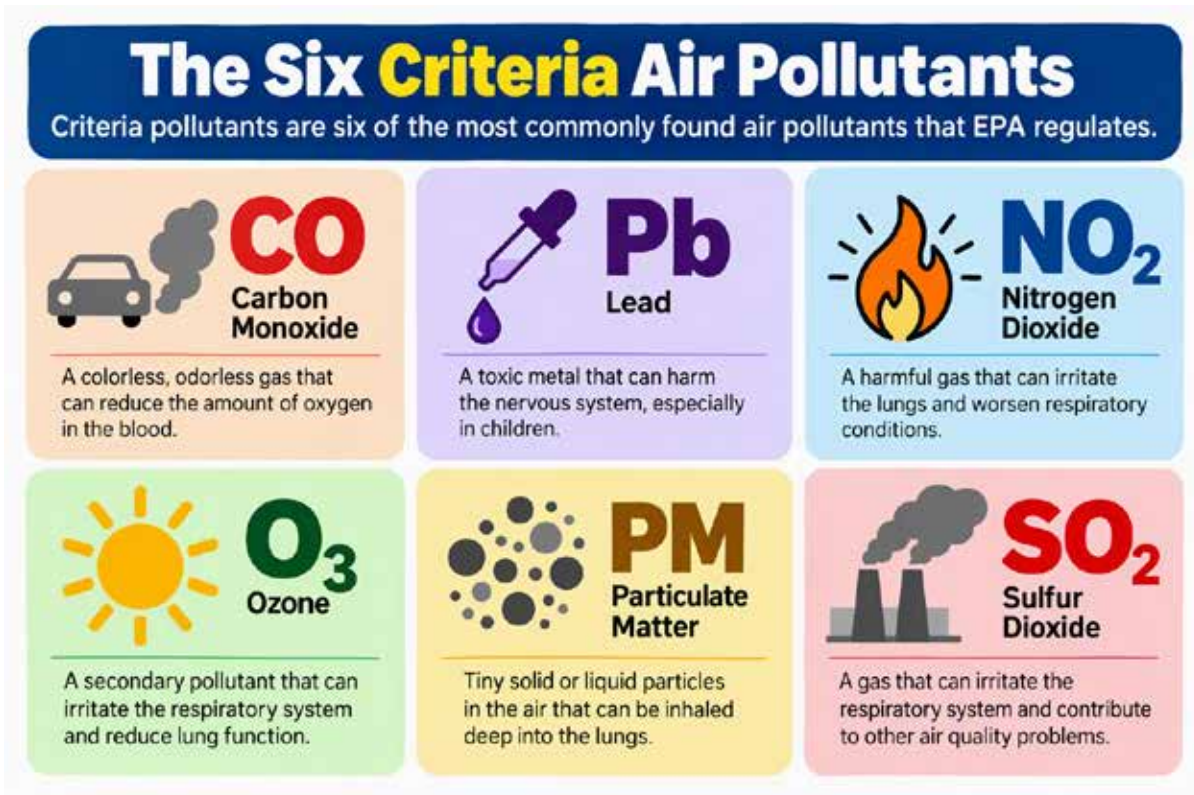
Before an agency can approve a Notice of Construction application, it must examine how much pollution the proposed new facility can release into the air and make sure it meets all clean air requirements.

Air agencies decide which requirements apply to a facility by looking at the maximum amount of each pollutant that the facility can possibly release. This is known as a facility's potential to emit. A facility's potential to emit is based on its physical design and limits on its operation.⁵⁶

As part of the permitting process, air agencies look at two categories of pollutants: criteria and hazardous air pollutants. Each of these categories of pollutants has its own requirements.



Air pollution over Seattle. Photo Credit / Aaron McCoy, Getty Images



Criteria Air Pollutants

As part of the preconstruction permitting process, air agencies must decide if a facility is a major or minor source of air pollution of any of the six criteria pollutants.⁵⁷

- If a facility could release 250 tons or more of any one of the criteria pollutants per year, it is called a “major source” of pollution.⁵⁸ Major sources must go through a stricter review process known as the federal Prevention of Significant Determination program.⁵⁹
- If a facility releases less than 250 tons of criteria pollutants, it is called a “minor source” and faces less strict requirements.⁶⁰

What Happens If a Proposed Plant is a Major Source of Criteria Pollution?

Major sources must go through the Prevention of Significant Deterioration (PSD) program, which is

designed to prevent or lessen a facility’s harm to public health and the national parks and wild areas.

Under the federal PSD permitting program, a facility must:

Prove it is using the best available control technology (BACT) to reduce pollution as much as possible considering energy, environmental, and economic impacts;

Show that its pollution will not violate certain federal requirements (e.g. National Ambient Air Quality Standards or PSD increment);

Examine how its pollution could affect soil, plants, and visibility in the area.⁶¹

A major source can avoid stricter review if the company agrees to legal limits that keep its pollution below 250 tons per year. Facilities that do this are called “synthetic minor sources.”



Washington state law requires a new source, including minor sources of pollution, to use best available control technology (“BACT”) for all air pollutants not previously emitted.⁶² The State-BACT requirements are similar to the Federal-BACT requirements for major sources.⁶³

Hazardous Air Pollutants

Because some air pollutants are particularly dangerous to human health even in very small amounts, they are given special consideration under the Clean Air Act. These pollutants are called hazardous air pollutants, or air toxics.⁶⁵ Hazardous air pollutants can cause cancer, damage the nerves, heart, lungs, liver, skin, and reproductive system, and can harm babies before they are even born.

Many of these pollutants can:

- enter the body through multiple pathways including water, soil, food, and air
- linger in the environment long after they are released
- build up in the body over time, meaning that even small amounts can become more harmful the longer a person is exposed⁶⁶

There are 188 listed hazardous air pollutants.⁶⁷ Examples of hazardous air pollutants include formaldehyde, asbestos, and benzene. Congress updated the Clean Air Act in 1990 to set stricter requirements for these toxic pollutants, directing EPA to set pollution limits based on the lowest emitting (also called best performing) plants within a source category.⁶⁸

When Is a Proposed Plant a Major Source of HAPs?

A facility is considered a major source of hazardous air pollution if it can release:

- 10 tons per year of one single HAP, or
- 25 tons per year of total HAPs combined.⁶⁹

Major sources must meet strict pollution limits. The EPA sets these limits by looking at the best-performing facilities in that source category already in operation and requiring all major sources to meet that same standard.⁷⁰ These standards are called Maximum Achievable Control Technology, or MACT standards.⁷¹

If EPA has not yet set MACT standards for a specific type of facility, the state or local air agency reviewing the facility permit, must conduct its own individual analysis to set pollution limits (known as a “case-by-case” analysis).⁷² The objective of the case-by-case analysis is to set emission limits that are at least as good as the best-performing similar type of facility already in operation.⁷³ This is known as the MACT “floor.”⁷⁴ The MACT floor ensures that all HAPs sources “at least clean up their emissions to the level that their best performing peers have shown can be achieved,” without considering how much it costs.⁷⁵

A facility that is not a major source of hazardous pollutants is considered an area or minor source, and less strict regulations apply to it.⁷⁶

WASHINGTON STATE RULES FOR TOXIC AIR POLLUTANTS

Washington law requires applicants proposing to build a new facility that releases toxic air pollutants to show that the amount of each toxic pollutant released in the area will not go above levels considered safe by the state.⁷⁷

Washington law also requires t-BACT to be installed if a proposed new source will emit any toxic air pollutants.⁷⁸

PART FIVE

How to Find Out What's Happening in Your Community

Getting information about a proposed wood pellet plant as early as possible gives you a head start on getting involved in the public process. Here's where you can find important information about the proposed project as it goes through SEPA review and air permitting processes.

SEPA REVIEW

WHERE TO FIND THE LEAD AGENCY?	WHERE TO GET INFORMATION?
SEPA review is typically done by local city or county planning and permitting offices.	Check your specific city or county government website. State Environmental Policy Act (SEPA) Register Where you can find SEPA records. https://apps.ecology.wa.gov/separ/Main/SEPA/Search.aspx SEPA Lead Agency Contacts Where you can find contact information for lead agencies. https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-lead-agency-contacts#State **see list at Appendix D.

INFORMATION AVAILABLE ON SEPA REGISTER AND LEAD AGENCY WEBSITE

DOCUMENTS	WHAT INFORMATION CAN THE DOCUMENTS PROVIDE?
SEPA Environmental Checklist	The checklist provides the company analysis on how project could affect the area.
SEPA Determination	The determination provides the lead agency's official decision about what if any parts of the project will significantly impact the area, and any mitigation measures required to avoid, minimize or reduce impacts.

AIR PERMITTING

WHERE TO GET INFORMATION?

There are seven local air agencies divided by region that handle most of the air permitting in Washington, including the Notice of Construction air permitting process. For all other parts of the state that are not managed by local air agencies or tribal governments, the Washington Department of Ecology handles air permitting.⁷⁹

On the next page is a map that the Washington Department of Ecology created showing what region each air agency covers and their contact information. This map is available online at <https://ecology.wa.gov/about-us/accountability-transparency/partnerships-committees/clean-air-agencies>.

TIP

Regional clean air agencies post applications they have received on their websites. Check their websites often.

INFORMATION AVAILABLE ON AIR PERMITTING AGENCY'S WEBSITE

DOCUMENTS	WHAT INFORMATION CAN THE DOCUMENTS PROVIDE?
Notice of Construction Permit Application	Provides information about the project and the company's analysis on how it could affect air quality in the area.
Draft Determination to Approve the Air Permit	The draft determination provides the lead agency's initial analysis about: • Estimated potential emissions of pollutants from the proposed facility • Potential air quality impacts • Legal requirements the company must meet before and after building the facility • Initial air monitoring and testing requirements • Pollution control measures

Washington clean air agencies

Benton Clean Air Agency

(Benton County)
526 South Steptoe Street
Kennewick, WA 99336
509-783-1304
www.bentoncleanair.org

Northwest Clean Air Agency

(Island, San Juan, Skagit, Whatcom Counties)
1600 South Second Street
Mount Vernon, WA 98273
360-428-1617
www.nwcleanairwa.gov

Olympic Region Clean Air Agency

(Clallam, Grays Harbor, Jefferson, Mason, Pacific, Thurston Counties)
2940 Limited Lane NW
Olympia, WA 98502
360-539-7610 or 1-800-422-5623
www.orcaa.org

Puget Sound Clean Air Agency

(King, Kitsap, Pierce, Snohomish Counties)
1904 Third Avenue, Suite 105
Seattle, WA 98101
206-343-8800 or 1-800-552-3565
www.pscleanair.gov

Southwest Clean Air Agency

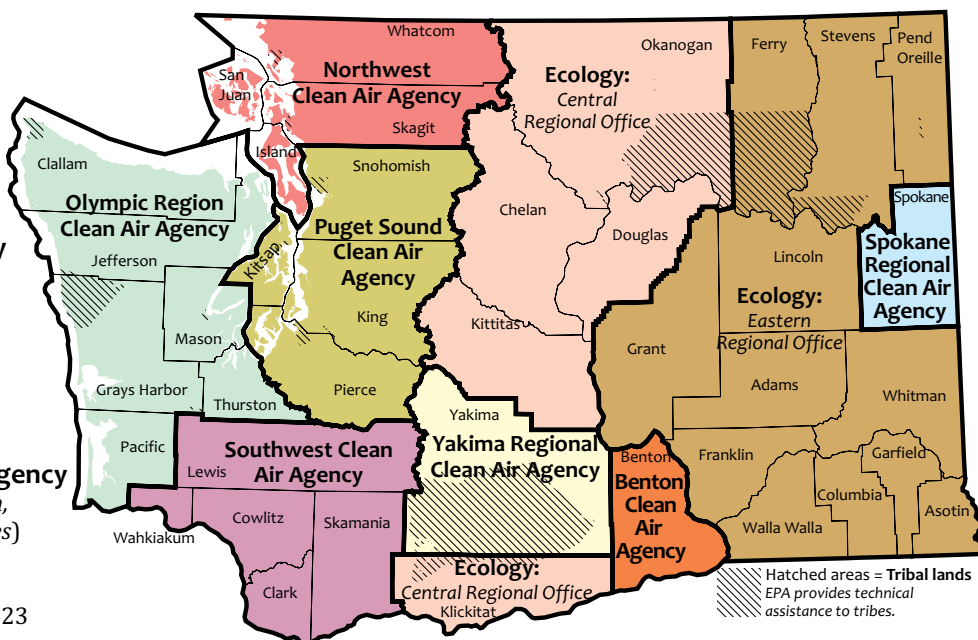
(Clark, Cowlitz, Lewis, Skamania, Wahkiakum Counties)
5101 NE 82nd Avenue, Suite 102
Vancouver, WA 98662
360-574-3058 or 1-800-633-0709
www.swcleanair.gov

Spokane Regional Clean Air Agency

(Spokane County)
1610 South Technology Blvd., Suite 101
Spokane, WA 99224
509-477-4727
www.spokanecleanair.org

Yakima Regional Clean Air Agency

(Yakima County)
186 Iron Horse Court, Suite 101
Yakima, WA 98901
509-834-2050
www.yakimacleanair.org



Ecology Central Regional Office

(Chelan, Douglas, Kittitas, Klickitat, Okanogan Counties)
1250 West Alder Street
Union Gap, WA 98903-0009
509-575-2490

Ecology Eastern Regional Office

(Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla, Whitman Counties)
4601 North Monroe Street
Spokane, WA 99205-1295
509-329-3400

Ecology Northwest Regional Office

15700 Dayton Avenue North
Shoreline, WA 98133
206-594-0000

Ecology Southwest Regional Office

P.O. Box 47775
Olympia, WA 98504-7775
360-407-6300

Ecology Air Quality Program

P.O. Box 47600
Olympia, WA 98504-7600
360-407-6800
www.ecology.wa.gov/airquality

Ecology Industrial Section

(pulp and paper mills, metal smelters)
P.O. Box 47600
Olympia, WA 98504-7600
360-407-6900

EPA Region 10

(tribal lands)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3188
206-553-1200 or 1-800-424-4372
www.epa.gov/r10-tribal

To request ADA accommodation,
call 360-407-6831 (voice),
711 (relay service), or
1-877-833-6341 (TTY).



Where Can You Find Additional Information About a Project?

Washington’s Public Records Act (RCW 42.56) gives you the right to request documents about a proposed wood pellet plant’s permits from state and local agencies. You can send these requests through the agency’s online portal, by email, by mail, or by fax. Below is a list of documents you may want to request for the SEPA and air permitting processes that may help you better understand the project and its potential impacts on the environment. There’s also an example of a record request in the appendix at page 44.

Does it cost anything to get records?

It depends. If you want physical copies of documents, agencies may charge a fee. These fees usually range from \$0.10 to \$0.50 per page. Many agencies will waive this fee if you’re requesting the information for public benefit – for example, to inform or protect your community.

SEPA REVIEW

What information can I ask the agency to give me?

DOCUMENTS	WHAT INFORMATION CAN THE DOCUMENTS PROVIDE?
All Documents Submitted with the SEPA Checklist	Documents might include details about the information the company used to explain and support their analysis on the project’s effects.
Emails Between the Agency and Company Related to the SEPA Checklist **suggest asking for emails from the month the permit application was submitted through the date you submit the records request.	Emails might provide information about questions or concerns that were raised during the SEPA review related to potential impacts of the proposed project.
All drafts of the agency’s determination (DNS, MDNS, and EIS)	Drafts might provide information about questions or concerns that were raised during the SEPA review related to proposed project’s potential environmental impact. Drafts also might provide information on how questions or concerns regarding the potential impacts from the project were addressed (i.e. were there any changes made before the determination was finalized).

AIR PERMITTING

What information can I ask the agency to give me?

DOCUMENTS	WHAT INFORMATION CAN THE DOCUMENTS PROVIDE?
Notice of Construction Permit Application With Attachments	Documents might include details about the information the company used to explain and support their analysis on the project's effects.
All Revisions to the Notice of Construction Permit Application	Emails might provide information about questions or concerns that were raised during the SEPA review related to potential impacts of the proposed project.
All Documents Submitted to Support the Notice of Construction Permit Application	Drafts might provide information about questions or concerns that were raised during the SEPA review related to proposed project's potential environmental impact. Drafts also might provide information on how questions or concerns regarding the potential impacts from the project were addressed (i.e. were there any changes made before the determination was finalized).
All Drafts of the Permit	Drafts might provide information about questions or concerns that were raised during the review. Drafts also might provide information on how questions or concerns regarding the potential air impacts from the project were addressed (i.e. were there any changes made?).
All Drafts of the Technical Support Document	Documents include the technical information the agency used in deciding to approve the permit.
Emails Between the Agency and Company TIP Ask for emails from the month the permit application was submitted through the date you submit the records request.	Emails might provide information about questions or concerns that were raised during the review of the company's air quality analysis. Emails might reveal how those questions or concerns were resolved.

PART SIX

How can you voice concerns?

STEP 1

Locate the public notice

SEPA ENVIRONMENTAL REVIEW

Washington law requires the agency leading the SEPA review of a proposed wood pellet plant to let the public know about it by providing public notice.⁸¹ Public notice includes important information about the potential impact of the proposed project, including the SEPA checklist that explains how the project might affect the environment, and the lead agency's initial determination about the project's impact (DNS, MDNS, or EIS). Most importantly, the public notice tells people how they can share their comments on the SEPA review and agency's determination.

Each local agency has its own way of giving public notice, so to keep up with what's going on in your community, it helps to contact them to learn what methods they use. These methods may include: (1) publishing in a paper of general circulation in the area where the proposed project will be located; (2) notifying public or private groups with interest in the proposal; (3) issuing a news release; or (4) publishing notice in an agency newsletter.

Additionally, all SEPA documents with a comment period must be sent to the Department of Ecology and are published in the SEPA Register online.

IMPORTANT: Pay attention to the comment deadlines because they are very strict.

AIR PERMITTING

For air permitting, Washington law requires air agencies to let the public know when they receive a NOC application from a company that wants to build a facility in their region that will release pollutants into the air.⁸² Air agencies must post the NOC application for the facility on their website for at least 15 days. This posting must include: (1) information about the application, (2) what kind of facility it is; and a note that the public can ask for a public comment period.⁸³

*** A public comment period can be requested by writing the air agency within the 15-day period.⁸⁴

Sometimes, the air agency must offer a public comment period before they can approve or deny an NOC application. This can happen if: (1) there will be an increase in emissions of any air pollutant above certain thresholds; or (2) there is significant public interest.⁸⁵

When there is a public comment period, then the agency must offer notice that includes: (1) the draft approval of the application that contains the agency's analysis of the air impacts from the facility; (2) the draft permit that explains the requirements the facility must initially operate under once it is built; and (3) the draft technical support document.⁸⁶

Public notice of the comment period may be posted in: (1) a local paper where the proposed project will be located; (2) a news release from the agency; email to interested parties; or (4) an agency newsletter.

IMPORTANT: Make sure to check with the air agency to find out how they share public notice, so you can keep up with what's going on in your community. You can usually sign up for email notifications on the agency's websites.

STEP 2

Review documents and issue spot

SEPA ENVIRONMENTAL REVIEW

When reviewing the SEPA checklist and agency determination it is important to look for:

- Inaccuracies in the environmental checklist, determination, or other SEPA documents
 - *Ex: Agency determination says that the company's checklist adequately describes air impacts BUT the checklist does not include a lifecycle analysis for GHG emissions.*

Lifecycle analysis requires looking at the impacts that are part of each stage of the product. For example, in the case of a creating wood pellets, environmental impacts must assess emissions from delivering the wood to the facility, creating the pellets, shipping the pellets, and use of the pellets (i.e. burning the pellets).

- Potential environmental impacts that were not identified;
 - *Ex: Agency determination says that the company's checklist adequately describes water impacts BUT the checklist does not discuss the impact of wood dust settling into the nearby water waterbodies.*
- Adverse environmental impacts that were not adequately addressed;
 - *Ex: Checklist does not discuss how the company will reduce wood dust from the proposed wood pellet plant.*
- Possible mitigation measures that could or should be added to the proposal;
 - *Ex: Analysis of methods to reduce impacts like GHG emissions, noise, and wood dust run-off from the proposed wood pellet plant.*
- Reasonable alternatives to the proposal;
- The need for additional study;
- The merits of the alternatives and mitigation measures considered in the document; and
 - *Ex: Agency determines the company can mitigate its GHG emissions by joining the Sustainable Biomass Program. However, the Sustainable Biomass program states it doesn't guarantee carbon saving or carbon neutrality.*
- Reasons that a determination of nonsignificance is not appropriate and that an environmental impact statement (EIS) should be prepared.
 - *Ex: The agency did not do a lifecycle analysis for GHG emissions and studies have shown that wood pellet manufacturing releases more carbon than coal. The agency did not analyze impacts from wood dust.*

AIR PERMITTING

When reviewing the NOC documents, it is important to look at:

- VOC and HAP emissions analysis
 - *Ex: The agency listed wet hammermills (or green hammermills) as not emitting any VOCs and HAPs when information from other pellet mills shows that wet hammermills emit several tons of VOCs and HAPs.*
- VOC and PM emissions from the wood storage piles.
- Methods to reduce emissions from wood storage piles.
- Pollution controls listed for emissions from wet hammermills.
- Pollution controls are listed for each piece of equipment that releases significant amounts of PM and VOCs (e.g., wet and dry hammermills, pelletizers, dryers).
- PM emissions from the project
 - *Check to see if PM 2.5 emissions from the plant push the area over the National Ambient Air Quality Standard or is very close to pushing the area over.*
 - *Annual limit is now 9.0 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).*
- Draft permit includes language that requires the facility to “take reasonable precautions” but does not identify what minimum activities meet the definition of reasonable precautions.
- Draft permit includes requirement that the facility “use best engineering practices” without specifying what those practices are.

Look at permits for similar facilities to compare, particularly facilities in the Pacific Northwest (Washington, Oregon, and Idaho) as well as British Columbia Canada.

STEP 3

Write a public comment letter

It's important to make your voice heard via the comment opportunity. In this section, we'll cover some suggested dos and don'ts for writing a strong public comment.

Remember: Check the public notice– there may be an opportunity to give a public comment in person.

DOs FOR AN EFFECTIVE PUBLIC COMMENT

- **Identify the project and/or relevant permit in the subject of your comment letter.** Clearly state the permit number (if available) and/or the public notice ID number.
- **Identify yourself and/or your organization (if applicable).** Include a brief explanation of why you have a connection to this issue (e.g., you live in the community, are a concerned citizen, etc.). If writing on behalf of an organization, provide a brief (1-2 sentence) explanation of who the organization represents and why the organization cares about this issue.
- **State your position up front.** Indicate your position on the proposed project, permit, etc., early in the comment letter and provide a brief sentence that summarizes your concerns. You can include more details about your concerns in the paragraphs that make up the body of your comment letter.
- **Be specific, address agency findings, and use supporting evidence.** Instead of saying that a project will harm the environment, explain what will be harmed (e.g., this project will have a negative impact on air quality and community health) and explain how, where, and why harm will occur. If you disagree with an agency's conclusion, explain why you think that conclusion is unsupported. Wherever possible, use evidence to support your claims such as studies, monitoring data, agency documents, maps, technical reports, or other reliable resources.
- **Mention any potential problem with the draft permit.** Include everything that you believe might be a problem in the draft permit, even if you haven't had time to develop your argument in detail.
- **Attach supporting documents, if any.** Feel free to attach supporting documents to your comments. If you want the supporting documents to be considered part of your comments, you must say so in the body of your comments.
- **Make it clear what you want the agency to do.** Make sure you tell the agency what action you think they should take, for example, denying a permit, requiring additional analysis, holding a public hearing, etc.
- **Close by thanking the agency for considering your comments.** Be sure to include your name and contact information in case the agency has follow-up questions about your comment.
- **Follow submission requirements carefully.** Submit your comments exactly as indicated in the public notice and ensure your comments are submitted ahead of the deadline. If you receive notification that your comment was submitted, be sure to maintain this for your records.

DON'TS FOR AN EFFECTIVE COMMENT LETTER

- **Don't focus on issues outside the agency's authority.** Ensure your concerns connect directly to the topics in the public notice and that the comment letter is focused on issues over which the relevant agency has authority.
- **Don't rely primarily on outrage or emotion when writing your comment.** Your concerns can be stated strongly, but factual and legally relevant arguments will generally carry more weight and influence.
- **Don't exaggerate or make unsupported claims.** Making unsupported claims can damage your credibility. If you acknowledge what the agency or applicant has done correctly while explaining what remains inadequate, it can make your criticisms more persuasive.
- **Don't keep the comment opportunity to yourself.** Share relevant comment opportunities with your community to ensure the agency knows that the public is concerned about this issue. Feel free to suggest some example language that other members of the community can use in their comments to help others get started.

Endnotes

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APPENDIX:

Appendix A—Glossary of key terms

Appendix B—Acronym List

Appendix C—Sample Records Request Letter

Appendix D—Sample Comment Letter

Appendix E—Additional Resources

Appendix F—Contact List for State and Local Agencies

APPENDIX A

Glossary of Key Terms

Best Available Control Technology (BACT) —This means the best pollution-control method a company can use, considering cost, that still lets them run their business. When a company wants to build or change a factory that will release air pollution, state law makes them use the cleanest technology available — as long as it isn't too expensive or unrealistic. A state or local air agency decides what counts as "best" case by case, looking at the pollution, the cost, and the energy needed.

Carbon-Neutral—An energy source that produces a net zero change in carbon levels.

Clean Energy—Power produced from sources that release little to no greenhouse gases or air pollutants during their lifecycle.

Green Energy—Energy source or technology that is seen as “environmentally friendly.”

Lifecycle Analysis — This means calculating the total greenhouse gases released through the “life” of a product: from greenhouse gases released creating the product to the greenhouse gases released when that product is used. For example, as part of the SEPA review, a company proposing to build a wood pellet manufacturing plant must assess emissions from delivering the wood to the facility, creating the pellets, shipping the pellets, and use of the pellets (i.e. burning the pellets for electricity).

Major Source — A facility that releases (or could release) a large amount of air pollution. For preconstruction air permitting, a facility is considered a major source of criteria air pollutants if it could release 100 tons a year of criteria air pollutants (for a list of especially polluting industries like power plants, refineries, and cement plants) or 250 tons a year for any other type of business. Because these facilities pollute more, major sources face stricter requirements and must go through the Prevention of Significant Deterioration permitting process.

Maximum Achievable Control Technology (MACT) — A strict federal pollution-control standard for facilities that are classified as a major source of hazardous air pollutants (HAPs).

A facility is a major source of air pollutants if it can emit at least 10 tons per year of a single HAP or 25 tons per year of total HAPs. Under MACT, a facility that is a major source of HAPs must apply emission reduction methods used by the best-controlled similar source operating in the real-world, regardless of costs.

Minor Source — A "minor source" is a business that releases air pollution but stays below the amount that would make it a "major source."

New Source Review (NSR) — The review process the state uses before a new factory is built, or an existing one is changed in a way that increases pollution. Before construction can begin, the business must apply for review, and the state checks whether the project will meet air quality rules. This process is what requires the "Notice of Construction Application" described below.

Notice of Construction Application — This is the official paperwork a business must file with the state or a local air agency before building a new pollution source, changing an existing one, or replacing pollution-control equipment. It describes the project and its expected pollution so regulators can review it before construction starts.

Notice of Construction Permit (NOC) — After a state or local air agency reviews a Notice of Construction Application, they issue a decision called an "order of approval" known as the Notice of Construction permit. This permit lists the conditions a company must follow, such as pollution limits and required equipment, before and after constructing a facility.

Prevention of Significant Deterioration Permit (PSD) — This is a special permit required for major new sources of pollution. Its purpose is to keep the air from getting significantly worse, even in places that currently meet air quality standards. The PSD permit requires a facility to prove that their emissions won't harm nearby air quality and take measures to ensure that it will not.

APPENDIX B

Acronym List

BACT—Best Available Control Technology

CO₂—Carbon Dioxide

DNS—Determination of Non-Significance

EIS—Environmental Impact Statement

EPA—U.S. Environmental Protection Agency

GHG—Greenhouse Gas

HAPs—Hazardous Air Pollutants

MACT—Maximum Achievable Control Technology

MDNS—Mitigated Determination of Non-Significance

NOC—Notice of Construction

NOX—Nitrogen Oxide

NSR—New Source Review

PM—Particulate Matter

PSD—Prevention of Significant Deterioration

SEPA—State Environmental Policy Act

SIP—State Implementation Plan

VOCs—Volatile Organic Compounds

Appendix C

Example Records Request Letters

1. *Example Public Records Request to Lead Agency for SEPA Review*



May 15, 2024

Brian Shay, City Administrator
Office of the City Clerk
609 8th Street
Hoquiam, WA 98550
bshay@cityofhoquiam.com

Re: Public Records Request: Pacific Northwest Renewable Energy (PNWRE)

Greetings:

This letter is a request for information under the Washington Public Records Act, RCW 42.56.070. The relevant time period for this request is January 1, 2023 through and including the date of response to this request.

We request documents in paper hard copy or electronic form (preferred), referring or relating to the following:

1. All documents and/or correspondence by and between any official or employee of the City of Hoquiam and any manager, employee, or contractor of Pacific Northwest Renewable Energy (PNWRE) regarding a proposed wood pellet plant or biomass plant at 411 Moon Island Road (Parcel 056401000400) or any other location in the city.
2. All documents reviewed and all comments and correspondence received on the PNWRE proposed project before, during, and after the SEPA review of the PNWRE proposal (SEPA 2023-02) and the Zoning Conditional Use Permit (Conditional-23-0001) process. Please exclude the Environmental Checklist dated June 19, 2023.

If electronic copies or photocopies of the above-requested documents can be provided for \$50 or less, please simply provide them via email or U.S. mail to the address shown below with an invoice for the amount due. If, in your best estimate, electronic versions or photocopies of the responsive documents will cost more than \$50, please let me know time when we may come to your office to review the requested documents.

In the event that any requested document is claimed exempt from disclosure or review, or otherwise withheld, we request an index or log of withheld documents, with the maximum possible identifying information that you can provide, including a description of the document, its date, its recipient(s), and the specific reason the document is being withheld. *See Progressive Animal Welfare Soc'y v. University of Washington*, 125 Wn.2d 243, 271, fn.18 (1994). We also request copies of any other person or organization's requests for the same or similar documents and copies of the City's response to those requests, if different than that provided to us.

NORTHWEST OFFICE 810 THIRD AVENUE, SUITE 610 SEATTLE, WA 98104

T: 206.343.7340 NWOFFICE@EARTHJUSTICE.ORG WWW.EARTHJUSTICE.ORG

May 15, 2024
Page 2

Please do not hesitate to contact me with any questions.

Sincerely,



Kristen L. Boyles
Earthjustice
810 Third Ave., Suite 610
Seattle, WA 98104
kboyles@earthjustice.org

2. Example Public Records Request to Air Agency

Source Name: Drax Longview

Documents Requested:

This records request concerns the proposed construction of the Drax wood pellet facility in Longview, Washington to be located at 175 East Mill Road, Longview, WA 98632.

Definitions for Public Records Request:

"Communications" means email and all associated attachments, letters, faxes, in-person meetings, phone calls, text messages, or any other correspondence.

"Cowlitz County" means any individual acting as an agent on its behalf.

"Drax" means any person acting as an agent on its behalf.

"Drax Plant" means the proposed wood pellet manufacturing plant to be located at 175 East Mill Road, Longview, WA 98632.

"EPA" means the Environmental Protection Agency, and any person acting as an agent on its behalf.

"SWCAA" means Southwest Clean Air Agency, and any person acting on its behalf.

"Washington State" means any state of Washington government official, entity, or agency, including the Department of Ecology, and Attorney General's Office, and any person acting as an agent on its behalf.

"Records" means, but is not limited to, telephone logs, minutes of meetings and a list of participants for those meetings, memoranda, notes, emails, notices, facsimiles, charts, tables, presentations, and other writings (handwritten, typed, electronic, or otherwise produced, reproduced, or stored), and materials that SWCAA has either created or obtained.

Description of Information Sought:

This public records request asks for:

(1) Any and all records and communications from May 15, 2025, through the date of completion of this records request, which concern the proposed construction the Drax wood pellet facility in Longview, Washington.

This includes any and all records and communications between SWCAA and Washington State; SWCAA and EPA; SWCAA and Drax representatives; SWCAA and Cowlitz County.

(2) Any new or revised notice of construction application for the proposed Drax wood pellet manufacturing plant, including any and all attachments and exhibits that Drax representatives submitted to SWCAA after May 15, 2025.

(3) Any and all records and communications from May 15, 2025, through the date of completion of this records request, which concern any new or revised notice of construction application for a proposed wood pellet manufacturing plant.

In the event that any requested record or communication is claimed, or continues to be claimed, exempt from disclosure or review or otherwise withheld, we request an index or log of documents withheld, with the maximum possible identifying information that you can provide, including a description of the document withheld, its date, its location, its recipient(s), and the specific reason(s) the document is being withheld.

Appendix D

Sample Comment Letters



January 12, 2024

Ms. Lauren Whybrew
Olympic Region Clean Air Agency (ORCAA)
2940 Limited Lane NW
Olympia, Washington 98502

Via email: lauren.whybrew@orca.org

In Re: Notice of Construction Notice #: 23NOC1606

Thank you for this opportunity to comment on the Notice of Construction for Pacific Northwest Renewable Energy, LLC wood pellet manufacturing facility in Hoquiam, Washington (Grays Harbor County) as referenced above.

FOGH is a broad-based 100% volunteer tax-exempt 501(c)(3) citizens group made up of crabbers, fishers, oyster growers and caring citizens. The mission of FOGH is to foster and promote the economic, biological, and social uniqueness of Washington's estuaries and ocean coastal environments. The goal of FOGH is to protect the natural environment, human health and safety in Grays Harbor and vicinity through science, advocacy, law, activism, and empowerment.

We incorporate by reference those comments made by Diane Dick, Peter, Riggs, Pivot Point, Grays Harbor Audubon, Natural Resources Defense Council, Wild Orca, Twin Harbors Waterkeeper, and Citizens for a Clean Harbor.

We find that this proposal is woefully inadequate in making sure that irreparable damage to the health, welfare, safety to humans and wildlife in an hemispherically important area. The proposal plans to locate its manufacturing plant adjacent to the Grays Harbor National Wildlife Refuge and within 5,000+/- feet of Emerson Elementary School, Hoquiam Middle School, and Hoquiam High School serving a population of over 1,100 students and staff.

The proximity of the PNWRE facility to schools raises serious concerns about potential dangers for attending children, both indoors and outdoors. The potential risks include, but are not limited to:

Air Pollution:

- Particulate matter (PM): Emissions from the facility, particularly PM_{2.5}, can easily travel and penetrate deep into children's lungs, leading to respiratory problems like asthma, bronchitis, and reduced lung function. One in 11 Grays Harbor citizens suffer from asthma. Children are more susceptible to the harmful effects of PM due to their developing lungs and higher breathing rates.
- Volatile organic compounds (VOCs): VOCs released from the facility can irritate airways, contribute to ozone formation (another lung irritant), and potentially impact children's neurological development.
- Hazardous air pollutants (HAPs): Even though individual HAP emissions might be stated to be below major source thresholds, exposure to even small amounts of certain HAPs can increase children's risk of cancer, developmental problems, and other health issues.

Post Office Box 1512 Westport, Washington 98595-1512 Phone (360) 648-2254
<http://fogh.org> rd@fogh.org 501(c)(3) tax-deductible

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Noise Pollution:

- Operation of the facility can generate constant noise pollution, including machinery noise, truck traffic, and emissions control equipment. This can disrupt sleep, learning, and concentration, negatively impacting children's academic performance and mental well-being.

Fire Risk:

- The possibility of fires involving large fuel storage piles presents a direct safety risk to students and staff at the schools. Additionally, smoke and harmful pollutants from a fire could significantly impact air quality in the surrounding area.

Psychological Stress and Environmental Justice:

- Knowing about the potential health risks from the facility can cause anxiety and stress among children and their families. This could impact their mental health and well-being, especially for vulnerable populations already facing environmental disadvantages.

Indoor Concerns:

- Airborne pollutants from the facility might infiltrate nearby buildings, including the schools, posing a risk to indoor air quality and impacting children's health even within classrooms.

The potential health risks and environmental concerns associated with the PNWRE facility's proximity to schools are significant and warrant careful consideration. A thorough environmental impact assessment that specifically addresses the risks to children's health is crucial before making any decisions regarding the facility's location or operation.

In addition, the location of a large wood pellet manufacturing facility adjacent to the Grays Harbor National Wildlife Refuge would likely present a significant problem for the over 500,000 shorebirds that use the area as a stopover point during their twice a year migration. The potential risks include but are not limited to:

Air quality:

Increased air pollution from PM2.5, VOCs, and NOx can:

- Directly impact the respiratory health of migrating birds, reducing their stamina and survival rates.
- Reduce visibility, making it harder for birds to navigate and find food.
- Contaminate food sources like insects and shellfish with fine particles, affecting the birds' nutritional intake.

Water quality:

Potential spills or leachate from the facility could:

- Contaminate the Grays Harbor Estuary and nearby wetlands, poisoning fish and invertebrates that serve as food for shorebirds.
- Increase turbidity, reducing the ability of birds to see prey in the water.
- Disrupt the delicate balance of the ecosystem, impacting food availability and habitat quality.

Noise and light pollution:

Operation of the facility can generate noise and light at night, potentially:

- Disrupt sleep patterns and migration behaviors of birds.
- Discourage birds from stopping at the refuge by creating an unsuitable environment.

Clogging and smothering:

- Large amounts of wood pellet manufacturing particulate matter (WPMPM) can physically clog and smother biofilm, reducing its availability to shorebirds. This is especially detrimental during low tide when food resources are limited.



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EXHIBIT A-2
Page 2 of 3

Alteration of biofilm composition:

- WPMPM can alter the composition of the biofilm community, favoring bacterial groups that are less palatable or nutritious for shorebirds. This can lead to decreased food intake and even malnutrition.

Chemical contamination:

- Wood pellets may contain trace amounts of contaminants like pesticides or heavy metals. These can be absorbed by biofilm-forming bacteria and subsequently ingested by shorebirds, potentially leading to bioaccumulation and health problems.

Reduced oxygen levels:

- When WPMPM decomposes, it can consume oxygen in the water column. This can create areas of low oxygen which can stress or even kill biofilm organisms and fish, further reducing food availability for shorebirds.

The potential for habitat destruction:

- Even if the facility itself is not directly located within the refuge boundaries, construction and operation could impact nearby habitats used by shorebirds for feeding, resting, and nesting.

Cumulative effects:

- The combined impact of the facility with other existing or planned industrial activities in the area could further exacerbate the negative consequences for birds.

The placement of a large wood pellet manufacturing facility adjacent to the Grays Harbor National Wildlife Refuge raises serious concerns about the health and well-being of the hundreds of thousands of shorebirds that depend on this critical stopover point. A thorough environmental impact assessment (EIS) that considers both air and water quality, noise, and light pollution, as well as potential habitat destruction and cumulative effects, is crucial before making any decisions regarding the facility's location.

It is essential to prioritize the protection of this important wildlife refuge and the migratory birds that rely on it. These combined factors could significantly decrease the number of shorebirds that successfully use the Grays Harbor National Wildlife Refuge as a stopover point. This could have cascading effects on the entire migratory flyway, impacting populations across continents.

The above concerns, in part, present our concerns about the location and operation of the proposed pellet plant. The potential health risks associated with a large wood pellet manufacturing facility in Hoquiam are serious and warrant careful consideration. A thorough environmental impact assessment, public input, and implementation of strict environmental regulations and controls are crucial to minimize the negative impacts on the health and well-being of Grays Harbor citizens. It's important to consider the combined effect of emissions from this facility with existing or planned industrial activities in the area. The cumulative impact could exacerbate negative consequences for air quality and public health. Robust monitoring and enforcement mechanisms are essential to ensure the facility complies with emission limits and operates in a way that minimizes environmental and health impacts.

We are also concerned about the placement and scarcity of monitoring systems and how they would capture emission from the proposed plant.

Thank you in advance for considering these comments.

Sincerely,



Arthur (RD) Grunbaum, President



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<http://fogh.org> rd@fogh.org 501(c)(3) tax-deductible

EXHIBIT A-2
Page 3 of 3

January 8, 2024

Via Electronic Mail: lauren.whymbrew@oreca.org
Lauren Whybrew
Olympic Region Clean Air Agency
2940 Limited Lane NW
Olympia, WA 98502

RE: Hazardous Air Pollutant (HAP) Deficiencies in Preliminary Determination for Pacific Northwest Renewable Energy, LLC (PNWRE)

Dear Ms. Whybrew:

In July 2023, Pacific Northwest Renewable Energy, LLC (PNWRE) submitted an air permit application for a 440,800 tpy wood pellet manufacturing facility to be located in Hoquiam, Washington. Although this industry has been operating in US South for more than a decade, this would be the first industrial-scale, export-based wood pellet plant in the US Pacific Northwest.

As attorneys with the Southern Environmental Law Center and Environmental Integrity Project, we have worked extensively on air quality issues at wood pellet plants since 2017, reviewing permits and applications for more than 35 pellet plants located in a dozen states. We have also compiled a database of more than 50 stack tests from these facilities and discovered thousands of tons of excess VOC and HAP emissions, resulting in more than \$6 million in environmental penalties and the installation of new pollution control technology at numerous plants.¹

We write now because PNWRE has vastly underestimated HAP emissions. The company claims the facility will emit only 1.3 tons of HAPs per year; this estimate is deeply flawed and based on incorrect or inappropriate emission factors—mostly AP-42 emission factors that are not specific to wood pellet plants. Recent stack tests and air permit applications that are specific to this industry show that a facility this size and with the controls proposed by PNWRE will emit 40 tons or more of total HAPs per year, including more than 20 tons of methanol and a significant amount of the particularly toxic HAP acrolein.

As just one example, the pellet manufacturer Drax, which operates 18 industrial-scale pellet plants, recently applied for an air permit for a 496,000 tpy facility in Longview, Washington. Drax estimates that its facility—which is comparable in scale, control technology, and feedstock to PNWRE—will emit 49 tons of HAPs.² This is well in line with numerous other recent

¹ See, e.g., https://www.nola.com/news/environment/british-company-agrees-to-pay-3-2-million-for-air-pollution-at-louisiana-wood-pellet/article_c451e610-4352-11ed-8a54-43df54e33ed5.html.

² Letter from Trinity Consultants, on behalf of Drax, to Danny Phipps, Air Quality Engineer, Southwest Clean Air Agency, at Attachment 2: Updated Potential Emission Calculations and Stack Test Data, Table C-2b (Mar. 29, 2023) (Attachment A). Available via Sharefile link at: <https://southernenvironment.sharefile.com/d-5a745e15d0ed64ba0bet8a6fe2ce87102>.

EXHIBIT A-4
Page 1 of 2

applications and stack tests at wood pellet plants,³ and suggests PNWRE will have the potential to emit about 43 tons of HAPs per year.

Additionally, PNWRE intends to operate wet (aka green) hammermills that will not be vented to any VOC controls and has improperly listed these units as not emitting any VOCs and HAPs. Most comparable mills vent these units to the furnace or dryer RTO for VOC and HAP control, and stack tests on uncontrolled wet hammermills⁴ show PNWRE's wet hammermills will emit up to 60 tons of VOCs and six tons of HAPs (in addition to the emission rates calculated above).

Given the foregoing, PNWRE's application is deficient and incomplete. Specifically, as a major source of HAPs, the company must submit a case-by-case Maximum Achievable Control Technology analysis. Additionally, the company's air toxics Ambient Impact Review is wholly irrelevant as it is based on inaccurate HAP emission rates. Finally, the company's BACT analysis for the wet hammermills is incomplete for failing to assess VOC controls.

These are only the most significant issues identified in PNWRE's application. We believe, however, that at minimum ORCAA must withdraw PNWRE's application from notice and comment until the company revises its application to address these issues. Finally, we are happy to share any of the resources that we have gathered concerning this industry.

Respectfully,

/s/ Patrick Anderson

Patrick J. Anderson
Southern Environmental Law Center
Ten 10th Street, NW, Suite 1050
Atlanta, Georgia 30309
404-521-9900
panderson@sclca.org

Heather Hillaker
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516-2356
919-967-1450
hillaker@sclnc.org

³ See, e.g. Enviva Pellets Waycross, Application for Title V Permit Significant Modification Without Construction, at Appendix C (Oct. 2021) (Attachment B) (Showing that at a production capacity of 920,000 tpy, the facility emits 79 tons of HAPs. This ratio equates to 38 tons of HAPs at PNWRE. Enviva, which operates 10 pellet plants, has used these same emission factors in recent applications in Alabama and Mississippi as well); see also Drax Amite BioEnergy, Title V Air Permit Application, at Appendix B (Feb. 2022) (Attachment C) (Showing 40 tons of HAPs emitted by the facility). These applications and related stack tests are available on Sharefile at:

<https://southernenvironment.sharefile.com/d-sa745e15d0ed64ba0bcb8a6fe2cc87102>.

⁴ Enviva Pellets Wiggins, LLC, Air Emission Test Report (Oct. 31, 2013) (Attachment D); Enviva Pellets Amory, LLC, Air Emission Test Report (Oct. 31, 2013) (Attachment E). Available on Sharefile at: <https://southernenvironment.sharefile.com/d-sa745e15d0ed64ba0bcb8a6fe2cc87102>.

Appendix E

Additional Resources

1. Carolyn Alkire, PhD and Spencer Phillips, PhD, *The Price of Biomass How Pellet Mills and Biomass Power Generation Affect Health and Health Costs in the South* (Mar. 2025), <https://dogwoodalliance.org/wp-content/uploads/2026/04/The-Price-of-Biomass-Report-by-Key-Log-Economics-2026.pdf>.
2. Emma Brentjens et. al., *Greenwashing: A Report on the Corporate Selling of Polluting Wood Pellet Production*, <http://rachelcarsoncouncil.org/wp-content/uploads/2023/10/greenwashing-web-2.pdf>.
3. Carolyn Alkire, PhD and Spencer Phillips, PhD, *The Price of Biomass How Pellet Mills and Biomass Power Generation Affect Health and Health Costs in the South* (Mar. 2025), <https://dogwoodalliance.org/wp-content/uploads/2026/04/The-Price-of-Biomass-Report-by-Key-Log-Economics-2026.pdf>.
4. Dogwood Alliance et. al, *Burning Billions For Biomass The Case For Cutting Subsidies, Not Forests* (2025), <https://dogwoodalliance.org/wp-content/uploads/2025/10/Burning-Billions-for-Biomass-Subsidies-Report-2025.pdf>.
5. Earthjustice, *Are Industrial Wood Pellets Renewable, Green Energy? Don't Believe It for a Second*, (Aug. 2024), <https://earthjustice.org/experts/kristen-boyles/are-industrial-wood-pellets-renewable-green-energy-dont-believe-it-for-a-second>.
6. Environmental Equity Information Institute and GridEquity, *The Environmental & Health Conditions Surrounding Drax Amite, Gloster, Mississippi* (2025), <https://dogwoodalliance.org/wp-content/uploads/2026/04/Environment-and-Health-Drax-Amite-Gloster-Report-GridEquity-2026.pdf>.
7. Environmental Integrity Project, *Dirty Deception: How the Wood Biomass Industry Skirts the Clean Air Act* (2017), <https://environmentalintegrity.org/reports/dirty-deception/>.
8. NRDC et. al, *The Sustainable Biomass Program: Smokescreen for Forest Destruction and Corporate Non-Accountability*,
9. NRDC, *A Bad Biomass Bet: Why the Leading Approach to Biomass Energy with Carbon Capture and Storage Isn't Carbon Negative* (October 12, 2021),

<https://www.nrdc.org/resources/bad-biomass-bet-why-leading-approach-biomass-energy-carbon-capture-and-storage-isnt>.

10. Rachel Carson Council, *Clear Cut: From Forests to Fumes*, <https://rachelcarsoncouncil.org/wood-pellet-campaign-2025/>.
11. Southern Environmental Law Center, *Global Markets For Biomass Energy are Devastating U.S. Forests* (2024), <https://www.selc.org/wp-content/uploads/2024/01/2026-Investigation-Booklet-Web-Version.pdf>.
12. Southern Environmental Law Center, *Burning Trees for Power: The Truth About Woody Biomass, Energy & Wildlife* (2018), https://www.selc.org/wp-content/uploads/2021/08/Biomass_Biodiversity_white_paper.pdf.
13. Alexandra Wisner et. al., *Bad Business: The Economic Case Against Woody Biomass as Renewable Energy*, (2020), <http://rachelcarsoncouncil.org/wp-content/uploads/2020/01/Bad-Business-Web.pdf>.

Appendix F

State and Local Agency Contact Lists (as of 9/16/2026)

Relevant State Agencies

Washington State agencies that can serve as SEPA lead agencies

Agency	Contact	Email	Phone
Department of Ecology	SEPA Unit	separegister@ecy.wa.gov	360-407-6922
Department of Fish and Wildlife	SEPA Regional Review Staff	(see WDFW SEPA reviewer map)	360-902-2534
Department of Natural Resources	SEPA Center	sepacenter@dnr.wa.gov	360-902-2117

County Agencies

All 39 Washington counties (planning / community development departments)

County	Contact Name	Email	Phone
Adams	Tim Unruh	timu@co.adams.wa.us	509-488-9441
Asotin	Karst Riggers	kriggers@co.asotin.wa.us	509-243-2020
Benton	Greg Wendt	greg.wendt@co.benton.wa.us	509-786-5612
Chelan	Deanna Walter	deanna.walter@co.chelan.wa.us	509-667-6225
Clallam	Bruce Emery	bruce.emery@clallamcountywa.gov	360-417-2323

County	Contact Name	Email	Phone
Clark	Land Use Review	landuse@clark.wa.gov	564-397-4489
Columbia	Dena Martin	dena_martin@co.columbia.wa.us	509-382-4676
Cowlitz	Wayne Nelsen	nelsenw@cowlitzwa.gov	360-577-3052 x1-6676
Douglas	Mark Kulaas	mkulaas@co.douglas.wa.us	509-884-7173
Ferry	William Folks	plan@co.ferry.wa.us	509-775-5225 ext. 3102
Franklin	Wes McCart	wmccart@franklincountywa.gov	509-545-3521
Garfield	Walter G. Morgan	garfeng@co.garfield.wa.us	509-843-1301
Grant	David Nelson	dnelson@co.grant.wa.us	509-754-2011 ext. 344
Grays Harbor	SEPA Review Team	psd@co.grays-harbor.wa.us	360-249-4222
Island	Hiller West	h.west@co.island.wa.us	360-678-7814
Jefferson	Greg Ballard	gballard@co.jefferson.wa.us	360-379-4454
King	Ty Peterson	ty.peterson@kingcounty.gov	206-477-0449

County	Contact Name	Email	Phone
Kitsap	Steve Heacock	sheacock@co.kitsap.wa.us	360-337-5777
Kittitas	Jamey Ayling	Jamey.Ayling@co.kittitas.wa.us	509-962-7065
Klickitat	Mo-chi Lindblad	mo-chil@klickitatcounty.org	509-773-5703
Lewis	Karen Witherspoon	karen.witherspoon@lewiscountywa.gov	360-740-2637
Lincoln	Courtney Thompson	cthompson@co.lincoln.wa.us	509-725-7911
Mason	Kell Rowen	KRowen@MasonCountyWA.gov	360-427-9670 ext. 352
Okanogan	Perry Huston	phuston@co.okanogan.wa.us	509-422-7218
Pacific	Shawn Humphreys	shumphreys@co.pacific.wa.us	360-642-9382
Pend Oreille	Greg Snow	gsnow@pendoreille.org	509-447-4821
Pierce	Sean Gaffney	sean.gaffney@piercecountywa.gov	253-798-2724
San Juan	Mark Tompkins	markt@sanjuanco.com	360-370-7517
Skagit	Brandon Black	brandonb@co.skagit.wa.us	360-416-1326
Skamania	David Waymire	davidw@co.skamania.wa.us	509-427-3906

County	Contact Name	Email	Phone
Snohomish	Michael McCrary	Michael.mccrary@snoco.org	425-388-3346
Spokane	Scott Chesney	schesney@spokanecounty.org	509-477-7212
Stevens	Erik Johansen	ejohansen@co.stevens.wa.us	509-684-2401
Thurston	Christina Chaput	christina.chaput@co.thurston.wa.us	360-786-5486
Wahkiakum	David Hicks	hicksd@co.wahkiakum.wa.us	360-795-3067
Walla Walla	Thomas E. Glover	tglover@co.walla-walla.wa.us	509-524-2621
Whatcom	Amy Keenan	akeenan@whatcomcounty.us	360-778-5943
Whitman	Alan L. Thomson	alan.thomson@co.whitman.wa.us	509-397-5211
Yakima	Lynn Deitrick	lynn.deitrick@co.yakima.wa.us	509-574-2300

City Agencies

Washington cities and towns (planning / community development departments)

City	County	Contact	Email	Phone
Aberdeen	Grays Harbor	Lisa Scott	lscott@aberndeenwa.gov	360-537-3238
Anacortes	Skagit	Don Measamer	don@cityofanacortes.org	360-299-1942

City	County	Contact	Email	Phone
Auburn	King, Pierce	Jeff Tate	jtate@auburnwa.gov	253-804-5036
Bellevue	King	Elizabeth Stead	estead@bellevuewa.gov	425-452-2725
Bellingham	Whatcom	Kurt Nabbefeld	knabbefeld@cob.org	360-778-8351
Black Diamond	King	Mona Davis	mdavis@blackdiamondwa.gov	360-851-4447
Blaine	Whatcom	Alex Wenger	awenger@cityofblaine.com	360-543-9979
Bonney Lake	Pierce	Jason Sullivan	sullivanj@cobl.us	253-447-4355
Bothell	King, Snohomish	Ashley Winchell	planning@bothellwa.gov	425-471-0103
Bremerton	Kitsap	Andrea Spencer	andrea.spencer@ci.bremerton.wa.us	360-473-5283
Burien	King	Nicole Gaudette	nicoleg@burienwa.gov	206-436-5574
Camas	Clark	Robert Maul	rmaul@cityofcamas.us	360-817-1568
Carnation	King	Jean Lin	jean.lin@carnationwa.gov	425-549-0400
Centralia	Lewis	Hillary Hoke	hhoke@cityofcentralia.com	360-330-7662
Chehalis	Lewis	Tammy Baraoni	tbaraoni@ci.chehalis.wa.us	360-345-2229

City	County	Contact	Email	Phone
Cheney	Spokane	Brett Lucas	blucas@cityofcheney.org	509-498-9240
College Place	Walla Walla	Jonathan Rickard	jrickard@cpwa.us	509-349-8524
Covington	King	Gina Estep	publiccomment@covingtonwa.gov	253-480-2400
Dayton	Columbia	Meagan Bailey	meagan_bailey@co.columbia.wa.us	509-382-3940
Des Moines	King	Susan Cezar	scezar@desmoineswa.gov	206-870-6725
East Wenatchee	Douglas	Lori Barnett	lbarnett@eastwenatcheewa.gov	509-884-5396
Edmonds	Snohomish	Robert Chave	chave@ci.edmonds.wa.us	425-771-0220
Edgewood	Pierce	Jeremy Metzler	jeremy@cityofedgewood.org	253-831-4266
Ellensburg	Kittitas	Stacey Henderson	hendersons@ci.ellensburg.wa.us	509-925-8608
Enumclaw	King	Chris Pasinetti	cpasinetti@ci.enumclaw.wa.us	360-615-5726
Ephrata	Grant	Ron Sell	rsell@ephrata.org	509-754-4601 ext. 124
Everett	Snohomish	Karen Stewart	kstewart@everettwa.gov	425-259-8731
Federal Way	King	Brian Davis	brian.davis@cityoffederalway.com	253-835-2612

City	County	Contact	Email	Phone
Forks	Clallam	William R. Fleck	rodf@forkswashington.org	360-374-5412
Gig Harbor	Pierce	Katrina Knutson	knutsonk@cityofgigharbor.net	253-853-7631
Grandview	Yakima	Anita Palacios	anitap@grandview.wa.us	509-882-9208
Granite Falls	Snohomish	Darla Reese	darla.reese@ci.granite-falls.wa.us	360-691-6441
Hoquiam	Grays Harbor	Brian Shay	bshay@cityofhoquiam.com	360-538-3983
Issaquah	King	Keith Niven	keithn@issaquahwa.gov	425-837-3100
Kalama	Cowlitz	Adam Smee	asmee@kalama.com	360-673-3265
Kelso	Cowlitz	Michael Kardas	mkardas@kelso.gov	360-432-6590 ext. 3376
Kenmore	King	Samantha Loyuk	sloyuk@kenmorewa.gov	425-398-8900
Kennewick	Benton	Gregory J. McCormick	greg.mccormick@ci.kennewick.wa.us	509-585-4463
Kent	King	Nate Schildmeyer	nschildmeyer@KentWA.gov	253-856-5439
Kirkland	King	Jon Regala	jregala@kirklandwa.gov	425-587-3255
La Center	Clark	Sarah Dollar	sdollar@ci.lacenter.wa.us	360-263-7665

City	County	Contact	Email	Phone
Lacey	Thurston	Rick Walk	rwalk@ci.lacey.wa.us	360-491-5642
Lakewood	Pierce	Courtney Brunell	cbrunell@cityoflakewood.us	253-983-7839
Longview	Cowlitz	Irene Rutikanga	Irene.Rutikanga@ci.longview.wa.us	360-442-5080
Lynnwood	Snohomish	David Kleitsch	dkleitsch@lynnwoodwa.gov	425-670-5042
Marysville	Snohomish	Angela Gemmer	gemmer@marysvillewa.gov	360-363-8240
Mercer Island	King	Jeff Thomas	jeff.thomas@mercerisland.gov	206-275-7732
Mill Creek	Snohomish	Christi Amrine	christia@cityofmillcreek.com	425-551-7254
Monroe	Snohomish	Ben Swanson	bswanson@monroewa.gov	360-863-4544
Mountlake Terrace	Snohomish	Christy Osborn	cosborn@ci.mlt.wa.us	425-744-6281
Moses Lake	Grant	Gilbert Alvarado	galvarado@cityofml.com	509-766-9235
Mount Vernon	Skagit	Stacie Pratschner	staciep@mountvernonwa.gov	360-336-6214
Mukilteo	Snohomish	Dave Osaki	dosaki@mukilteowa.gov	425-263-8000
Napavine	Lewis	Katie Williams	kwilliams@cityofnapavine.com	360-262-9344

City	County	Contact	Email	Phone
Newcastle	King	Mark Hofman	markh@newcastle.gov	425-386-4108
Normandy Park	King	Nicholas Matz	nmatz@normandypark.gov	206-248-8253
North Bonneville	Skamania	Tom Jermann	tomj@northbonneville.net	509-427-8182
Oak Harbor	San Juan	David Kuhl	dkuhl@oakharbor.org	360-279-4511
Ocean Shores	Grays Harbor	Alicia Bridges	abridges@osgov.com	360-940-7489
Olympia	Thurston	Nicole Floyd	nfloyd@ci.olympia.wa.us	360-570-3768
Pasco	Franklin	Jeff Adams	adamsj@pasco-wa.gov	509-545-3441
Port Angeles	Clallam	Shannen C. Cartmel	Scartmel@cityofpa.us	360-417-4751
Port Orchard	Kitsap	Nick Bond	planning@cityofportorchard.us	360-874-5533
Port Townsend	Jefferson	Emma Bolin	ebolin@cityofpt.us	360-390-4048
Pullman	Whitman	Kevin Gardes	kevin.gardes@pullman-wa.gov	509-338-3217
Puyallup	Pierce	Katie Baker / Jeff Wilson	kbaker@puyallupwa.gov / jwilson@puyallupwa.gov	253-435-3604 / 253-841-5502
Quincy	Grant	Tim Moore	tmoore@quincywashington.us	509-787-3523

City	County	Contact	Email	Phone
Redmond	King	Sarah Pyle	spyle@redmond.gov	425-556-2426
Renton	King	Jennifer Henning	jhenning@rentonwa.gov	425-430-7286
Richland	Benton	Mike Stevens	mstevens@ci.richland.wa.us	509-942-7596
Ritzville	Adams	Tom Reese	tom.reese@ritzville-wa.us	509-659-1930
Sammamish	King	Avril Baty	abaty@sammamish.us	425-295-0500
SeaTac	King	Jennifer Kester	jkester@seatacwa.gov	206-973-4842
Seattle	King	Stephanie Haines	stephanie.haines@seattle.gov	206-684-5014
Sedro-Woolley	Skagit	John Coleman	jcoleman@ci.sedro-woolley.wa.us	360-855-9930
Sequim	Clallam	Karla Boughton	kboughton@sequimwa.gov	360-683-4908
Shelton	Mason	Mark Ziegler	mark.ziegler@sheltonwa.gov	360-432-5194
Shoreline	King	Andrew Bauer	abauer@shorelinewa.gov	206-801-2531
Snohomish	Snohomish	Sean Curran	sean.curran@snoco.org	425-262-2965
Snoqualmie	King	Mark Hofman	mhofman@snoqualmiewa.gov	425-283-7067

City	County	Contact	Email	Phone
Spokane	Spokane	Garett Jones	gjones@spokanecity.org	509-363-5462
Spokane Valley	Spokane	John Hohman	jhohman@spokanevalley.org	509-720-5300
Stanwood	Snohomish	Ryan C. Larsen	ryan.larsen@ci.stanwood.wa.us	360-629-2181
Stevenson	Skamania	Ben Shumaker / Leana Kinley	planning@ci.stevenson.wa.us	509-427-5970
Sumner	Pierce	Ryan Windish	ryanw@sumnerwa.gov	253-299-5524
Sultan	Snohomish	Andy Galuska	andy.galuska@ci.sultan.wa.us	360-793-1311
Sunnyside	Yakima	Mike Shuttleworth	mshuttleworth@sunnyside-wa.gov	509-836-6393
Tacoma	Pierce	Lisa Spadoni	lspadoni@tacoma.gov	253-377-3310
Tumwater	Thurston	Tami Merriman	tmerriman@ci.tumwater.wa.us	360-754-4180
University Place	Pierce	David Swindale	dswindale@cityofup.com	253-460-2519
Vancouver	Clark	Greg Turner	greg.turner@cityofvancouver.us	360-487-7883
Walla Walla	Walla Walla	Preston Frederickson	pfred@wallawallawa.gov	509-524-4735
Wenatchee	Chelan	Glen DeVries	gdevries@wenatcheewa.gov	509-664-5981

City	County	Contact	Email	Phone
West Richland	Benton	Mike Stevens	mstevens@westrichland.org	509-967-5902
Winlock	Lewis	Stormy Bradley	wincomdev@toledotel.com	360-785-3811 ext. 203
Woodinville	King	Robert Grumbach	RobertG@ci.woodinville.wa.us	425-877-2271
Woodland	Clark, Cowlitz	Melissa Johnston / Travis Goddard	johnstonm@ci.woodland.wa.us / goddardt@ci.woodland.wa.us	360-225-7299
Yakima	Yakima	Joan Davenport	joan.davenport@yakimawa.gov	509-575-6183
Zillah	Yakima	Ardele Steele	asteeler@cityofzillah.us	509-829-5151

Local Clean Air Agencies

Areas not covered below are reviewed by Ecology's Air Quality Program

Agency	Jurisdiction	Contact	Email	Phone
Benton Clean Air Agency	Benton County	Robin Bresley Priddy	robin.priddy@bentoncleanair.org	509-783-1304
Northwest Clean Air Agency	Island, Skagit, and Whatcom counties	Agata McIntyre	agatam@nwcleanairwa.gov	360-428-1617 ext. 213
Olympic Region Clean Air Agency	Clallam, Grays Harbor, Jefferson, Mason, Pacific, and Thurston counties	Engineering Team	sepa@orcaa.org	360-539-7610

Agency	Jurisdiction	Contact	Email	Phone
Puget Sound Clean Air Agency	King, Kitsap, Pierce, and Snohomish counties	Engineering Manager	sepa@pscleanair.gov	206-689-4061
Southwest Clean Air Agency	Clark, Cowlitz, Lewis, Skamania, and Wahkiakum counties	Clint Lamoreaux	clint@swcleanair.gov	360-574-3058 ext. 131
Spokane Regional Clean Air Agency	Spokane County	April Westby	awestby@spokanecleanair.org	509-477-4727
Yakima Regional Clean Air Agency	Yakima County	Hasan Tahat	hasan@yrcaa.org	509-834-2050 ext. 105

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