

**To: George Davis, via Susan Curry, DEQ, and hand delivered 9/19/2013 (three pages, six enclosures with comments)**

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**Where can I send comments?**

You can submit your comments by mail, fax or email:

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Written comments are due by 5 p.m., Sept. 25th, 2013

In my manila envelope I have included the following written testimony concerning the DEQ proposed Intel Title V permit pertaining to toxic air emissions.

**1.** My letter to the editor which has been published in the following Newspapers: Hillsboro Tribune, Forest Grove Newstimes, The Oregonian Leader and the Hillsboro Argus. In that letter, I wrote: Intel's Ronler Acres facility in Hillsboro filed a report with the Office of the State Fire Marshal in September 2010 that listed 154 hazardous chemicals. Of those, 54 are listed as "acute health hazards," 21 are listed as "corrosive materials" and one — lead — is listed as a "chronic health hazard." According to Clean Water Services, the county's wastewater agency, its job is to assure that Intel does not allow corrosive materials to get into public pipes. Five of those 54 "acute health hazards" listed "proprietary organic solvent" as the active ingredient. By federal law, Intel does not have to name those ingredients. Some of those are volatile organic substances; some may be known endocrine disrupters and cancer-causing chemicals.

-- Intel's previous emission permit did not permit the release of fluorides, small particulate matter, or greenhouse gases, including CO<sub>2</sub>. With Intel's proposed permit, the company is applying to release 6.4 tons per year of fluorides, 14 tons per year of small particulate matter and 819,000 tons per year of carbon dioxide. This greenhouse gas is the primary human cause of climate warming. In addition, Intel plans to nearly double its release of volatile organic compounds from 99 to 178 tons per year. VOCs cause significant health-related problems.

**2.** I have enclosed the Office of State Fire Marshal's September 20, 2010, Public Report. The last page of that report lists how I analyzed those chemicals by category.

**3.** The United States Environmental Protection Agency Office of Criminal Enforcement, Forensics and Training National Enforcement Investigations Center June 3, 2010, Memorandum report subject: Transmittal of Final Report for "CAA Compliance Investigation, Intel Corporation, Rio Rancho, New Mexico" (VPo879).

Following is the link:

[http://media.oregonlive.com/business\\_impact/other/Intel%20Inspection%20Report%20-%20NEIC%20and%20EPA%20summary%20only.pdf](http://media.oregonlive.com/business_impact/other/Intel%20Inspection%20Report%20-%20NEIC%20and%20EPA%20summary%20only.pdf)

I have enclosed the entire report as well as a separate document, pages 27 and 28, Summary of Findings, Areas of Noncompliance and Areas of Concern.

This report was based upon a non announced, surprise, onsite investigation conducted from December 7 through 11, 2009. The onsite visit consisted of personnel interviews and plant inspections.

In my oral testimony on September 16, I read parts of the Summary of Findings, pages 26 and 27. Joe Miller also read at Hearing parts of those summaries. Between the two of us we read as testimony all of those Area of Noncompliance and Areas of Concern. Those concerns are totally applicable to the Intel Plants in Oregon. I emphasized Part D. "Intel's permits do not contain parametric monitoring requirements or operational ranges for any of the scrubbers. Without required continuous

monitoring (e.g., pH, scrubber liquor flow) and specific operational requirements, NEIC (National Enforcement Investigation Center) cannot verify that the scrubbers is continuously operating properly and can meet any specific efficiency, and part H. Intel's permits do not contain short-term (hourly, daily, monthly) emission limits for VOCs ad HAPs. Without short-term limits, Intel can have spikes in its emission profile that can lead to acute exposures of these chemicals. Further, since the permit does not require monitoring and recordkeeping of emission during upsets, NEIC could not accurately confirm Intel's minor source status.

Intel plants in Oregon should be required by DEQ and EPA to install and use Continuous Monitoring of emissions at the point of discharge, and require Intel to install equipment that would allow them to follow all of these NEIC Areas of Concern. Dale Feik

**4. Corrales New Mexico Goals.** I quoted these in my oral Hearing testimony: Q. WHAT IS CRCAW'S (CORRALES RESIDENTS FOR CLEAN AIR AND WATER) ULTIMATE GOAL?

I testified that these are also my ultimate goals: I substituted NMED for DEQ (Oregon Department of Environmental Quality) and I substituted for citizens of Corrales, citizens of the Hillsboro and Portland Metropolitan area since Intel's emissions, by DEQ, George Davis's, statements, flows toward Oregon City and NE Portland as the predominate air flow pattern.

A:

1. To require Intel to take reasonable measures to ensure the toxic chemical emissions by Intel do not threatened the health and or lives of residents and employees.
2. To require NMED to live up to their mission statement for protecting the health and lives of the citizens of Corrales, surrounding communities and ultimately the entire population of the State of New Mexico.
3. And to encourage Intel to seek out alternative methods for wafer processing which uses little to no toxic chemicals and reduces water usage.

**5.** The DVD Living Downstream documentary of Sandra Steingraber's book entitled, Living Downstream. An Ecologist's Personal Investigation of Cancer and the Environment. Steingraber as a college student got bladder cancer caused by living downstream of a lake that was contaminated by industrial waste, carcinogenic emissions. My testimony at this time does not concern water contamination, but it certainly concerns air contamination – living downstream of the source of all of those toxic, possibly cancer producing chemical emissions. In my oral testimony I said that people, the Hearing officer could Google Living Downstream and Bill Moyers to get to the sight to listen to Moyers interview Steingraber. That's how I learned about it and subsequently have purchased 19 DVDs and am giving them away. Please watch the DVD and also get on the web site and either read the transcript or listen to the interview.

**6. Chemicals and Radiation Linked to Breast Cancer article by the Breast Cancer Fund. Note the carcinogenic chemicals listed, in particular Organic Solvents, Intel's permit asking for tons of it to be emitted.**

<http://www.breastcancerfund.org/clear-science/radiation-chemicals-and-breast-cancer/>

<http://www.breastcancerfund.org/clear-science/radiation-chemicals-and-breast-cancer/organic-solvents-other-than-benzene.html>

Sincerely,

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