

October 14, 2013

To: DEQ Northwest Region Air Quality Permit Coordinator

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From: Board of Washington County Citizen Action Network (WC CAN)
Re: Permit number 34-2681

Washington County Citizen Action Network (WC CAN) is a coalition of grassroots advocates (individuals and groups) dedicated to improving quality of life in Washington County by promoting healthy and sustainable communities, social and economic justice, and open and responsive government. Incorporated in the State of Oregon as a Private Non-profit for Public Benefit, we have these overriding goals:

1. Empower people and citizen involvement.
2. Foster sustainable, health-enhancing communities.
3. Improve environmental stewardship.
4. Achieve social and economic justice.
5. Ensure open and responsive government.

In responding to the challenges presented by Intel's permit request, and the constraints under which we understand DEQ operates in modifying the permit's terms or conditions, we have joined forces with Neighbors for Clean Air and Northwest Environmental Defense Center to submit joint testimony.

In addition, though, our mission and goals guide our Board s to make the following requests of DEQ. First, two procedural requests:

1. Allow time for submission of further evidence and testimony. Citizens have expended much personal and professional time and effort to research Intel's regulatory history both here and in other locations. We appreciate the extensions granted already and the opportunity to speak at a "hearing", but were amazed to find that DEQ couldn't manage to make an accurate

and complete audio record of that hearing. Informal attempts to recreate it in personal interviews hardly constitute the sort of record on which one could confidently file an appeal or a legal challenge. Further, it has been difficult due to staff absences for people to access DEQ records they feel are relevant to consideration of this permit. We feel another extension is appropriate to assure that all relevant community concerns and evidence are brought before DEQ prior to deciding on the terms of the permit.

2. Reconsider your decision to process Intel's permit as a "minor source" polluter. Not only is the timing of their initial Expansion Permit sketchy, but the estimated maximum outputs of some Criteria and Hazardous Pollutants seem questionable, falling just barely under amounts that would trigger evaluation as a "major source". In particular we request the following:

Terms or conditions to be included in the permit:

3. Continuous or frequent measurement and online reporting to DEQ -- and accessible to the public -- of emissions at stack sources. The current practice of twice-yearly reports to DEQ of Intel's summarized or averaged calculations about emissions leaves open at least two disturbing possibilities:

- a) devastating but undetected spikes in substances harmful to humans, animals, crops, local ecosystems and economies.
- b) grossly inaccurate emission reports, in the absence of empirical measures or inspections to document actual times and amounts emitted of critical and hazardous pollutants.,

4. A system for alerting downwind and surrounding communities when accidents occur or when "downtime" for scrubbers/burners may result in dangerous spikes. It is simply unconscionable for a business to subject innocent, unwarned neighbors to sudden or prolonged blasts of harmful gases.

5. Requirements that Intel cooperate in and provide funding for community efforts to monitor downstream health impacts, such as:

- a) **Scientific studies of air dispersal patterns carrying Intel plant plumes:** these should be specific to the geography and seasonal wind patterns at each location, so we will all know where and how far out the "danger zones" for critical HAPs might extend.
- b) **Community-based monitoring of impact indicators,** such as human breast-milk testing and/or routine monitoring/reporting with downwind air sampling devices.

6. Requirements that Intel employ best practices and technology to control contaminants and clean exhausts before emitting. Washington County, like most of the Metro region, has long envisioned and planned for smarter, healthier urban areas: mixed uses and residences clustered around transit hubs and corridors; pedestrian- and bike-friendly roads, parks, shops and service centers; nearby access to rural scenery, recreation, and locally grown food. What

literally clouds this vision is lack of meaningful regulation to keep air clean and safe for all those people to breathe -- even when a big industrial plant operates nearby.

We hope DEQ can find ways to work with us and with Intel to establish these requests as legally binding requirement within the Title V permit granted to Intel.

Submitted by email October 14, 2013 by

Linda Peters WC CAN Chair, for
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