

To: WaysandMeans.NaturalResourcesSub@state.or.us

From: Dale Feik

Date: March 25, 2015

RE: DEQ Budget

I am attaching a Washington County Central Committee Intel Resolution adopted January 28, 2015. It has eight 'Whereas' statements and two 'Therefore' statements; the second 'Therefore' says:

"To require DEQ to live up to their mission statement for protecting the health and lives of local residents of the citizens of Washington County, surrounding communities and ultimately the entire population of the State of Oregon." In order to do that you need to have adequate funding and therefore I am testifying to ask for that funding.

I have been attending the Blue Ribbon Water Advisory Committee meetings and making public comment. I have attached one of my emails to Jennifer Wigal, DEQ Water Manager, and facilitator of the Blue Ribbon Committee meetings. In that email (which was also included in the minutes of the Blue Ribbon Committee) I state:

"Lobbying to get only a 2.9% increase in staffing to do this work, and then being told by Commissioner Colleen Johnson that improvements are expected while many members of the Blue Ribbon Committee openly oppose the funding as well as ways to improve permit issuance, seems very counterproductive to your mission – protecting and restoring Oregon's waters while carrying out the federal Clean Water Act. I am particularly concerned about DEQ's permitting program that protects Oregon's waters from pollution discharged by "point sources", wastewater into surface water, or onto land through a pipe or a discernible channel; following EPA "Point Source" rules is mandatory in order to protect and restore our waters."

In the last two years, I have had the opportunity to get to know many DEQ staff members at the Northwest Region offices and also at DEQ Headquarters. All have been very helpful, sincere and cordial in helping me answer my questions, in fulfilling official public records requests, getting information for me, and talking via the phone/email or in person about rules/regulations, complaint procedures, air and water advisory committees, etc. I certainly believe that we need a very strong proactive DEQ to help protect public health/safety and the environment – water, air, and land.

Sincerely

Dale (Feik –feek)

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Forest Grove, OR 97116

cell: 503-504-5972

A RESOLUTION of

The Democratic Party of Washington County

Regarding Intel's Toxic Air Emissions that Create Public Health Problems

Adopted January 28, 2015

WHEREAS, Intel's air emissions contain toxic and corrosive substances based on a September 2010 report filed with the Office of the State Fire Marshall that lists 154 hazardous chemicals as potential air emissions; and

WHEREAS, of those 154 hazardous chemicals listed in the Fire Marshalls report, 21 are listed as "corrosive materials" and one, lead, is listed as a chronic health hazard; and

WHEREAS, of the 54 listed "acute health hazards", some are listed as "proprietary organic" solvents which may include endocrine disrupters and cancer-causing agents; and

WHEREAS, 819,000 tons of greenhouse gases that Intel could release under the proposed permit is equal to 2,244 tons per day, 93.5 tons per hour, and more than 1.5 tons per minute which makes Intel the number five greenhouse gas polluter in Oregon after the following Electrical Power plants: Boardman Coyote Springs at 887,346 metric tons per year, Klamath Cogeneration Project at 891,786 tons per year, Hermiston Power Plant at 1,118,461 tons per year and Boardman at 2,510,391 tons per year; and

WHEREAS, Intel could, under the proposed permit, be allowed to release an entire year's amount of any permitted compound, no matter how toxic, in a day, or an hour, or as short a time as they wish; and

WHEREAS, Intel, on April 22, 2014, was fined \$143,000 for three major violations of DEQ Rules, but still allowed to continue building two massive manufacturing plants without a valid construction permit; and

WHEREAS, Intel would do the public a good by divulging the amount of previous fluoride emissions in Washington County since, contrary to Intel and DEQ statements, are toxic and damaging to people's health; and

WHEREAS, Intel should have applied for a tougher EPA permit requiring it to meet newly adopted Prevention of Significant Deterioration standards;

THEREFORE, BE IT RESOLVED, The Democratic Party of Washington County urges the State of Oregon:

1. To require Intel to use Best Available Abatement Technology to ensure the toxic chemical emissions by Intel do not threaten the health and or lives of residents and employees.
2. To require DEQ to live up to their mission statement for protecting the health and lives of local residents of the citizens of Washington County, surrounding communities and ultimately the entire population of the State of Oregon.

Submitted: Dale Feik, PCP, 10/29/2013 and resubmitted and approved by Resolution/Platform committee 8/12/2014, edited by Resolution and Platform Committee and then resubmitted to Gerritt Rosenthal 9/13/2014

References listed on next page.

<http://www.elgritonnm.org/2012/05/16/should-intel-study-hydrogen-fluoride-releases/> **Should Intel Study**

Hydrogen Fluoride Releases? by Jeff Radford, May 16, 2012. Intel wants to know whether Corrales, New Mexico, residents are interested in knowing how its elevated releases, or “spikes,” of highly toxic hydrogen fluoride (HF) may affect them. A different answer might be obtained by asking whether villagers want Intel to study the health effects of its HF pollution.

http://www.nlm.nih.gov/medlineplus/news/fullstory_141667.html **Air pollution a leading cause of cancer - U.N. agency** LONDON/GENEVA (Reuters) - The air we breathe is laced with cancer-causing substances and is being officially classified as carcinogenic to humans, the World Health Organization's cancer agency said on Thursday, 10/17/2013. The International Agency for Research on Cancer (IARC) cited data indicating that in 2010, 223,000 deaths from lung cancer worldwide resulted from air pollution, and said there was also convincing evidence it increases the risk of bladder cancer.

<http://www.breastcancerfund.org/clear-science/radiation-chemicals-and-breast-cancer/> **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 is asking for tons of it to be emitted.

<http://www.epa.gov/NSR/actions.html>

Final Revisions to the Implementation of the New Source Review Program for Condensable Particulate Matter

October 12, 2012 - This final clarifies that condensable particulate matter should be included as part of the emissions measurements for regulation of PM2.5 and PM10. Silica related.

<http://www.epa.gov/NSR/actions.html>

Proposed Step 3 for the GHG Tailoring Rule Continues to Focus Permitting on the Largest Emitters

February 24, 2012 - EPA is proposing to keep greenhouse gas permitting thresholds at current levels. These thresholds established under the GHG Tailoring Rule, define when permits under the New Source Review Prevention of Significant Deterioration and title V Operating Permit programs are required for new and existing industrial facilities. EPA also is proposing... [Proposed Rule \(PDF\)](#), [Fact Sheet \(PDF\)](#) development of presumptive Best Available Control Technologies (BACT) for sources of GHGs.

<http://www.epa.gov/epawaste/hazard/tsd/td/combust/> **Maximum Achievable Control Technology - MACT**

<http://pearl1.lanl.gov/external/c-cde/scf/pubs/images/la-12786.pdf>

CONCLUSION The Los Alamos Super Scrub™ machine is quite inexpensive to operate from an electrical as

well as a consumables standpoint. Figure 9 shows a dollar-per-kilowatt-hour number for measured electrical power usage at the main machine buss. As can be seen, the higher operating temperatures are more likely than higher pressures to cause higher operating costs. When adding up all the costs of operation, it is easily seen that the electrical costs would be small, compared to operating labor, maintenance, and repair.

<http://infohouse.p2ric.org/ref/01/00401.pdf> **Cleaning with Supercritical Carbon Dioxide** Los Alamos NATIONAL LABORATORY

<http://green.sba.gov/los-alamos-super-scrubtrademark-supercritical-carbon-dioxide-system-utilities-and-consumables-study> **The Los Alamos Super Scrub{trademark}: Supercritical carbon dioxide system utilities and consumables study** It is hoped that these results will prove of immediate benefit to those industries interested in but concerned about the cost of changing over to carbon dioxide cleaning on both small- and large-scale operations.

<http://pearl1.lanl.gov/external/c-cde/scf/pubs/images/la-ur-94-3136.pdf> **Precision Cleaning with Supercritical Carbon Dioxide for the Elimination of Organic Solvents and Reduction of Hazardous**

From: Dale Feik [<mailto:dfeik33@comcast.net>]
Sent: Tuesday, November 18, 2014 12:39 PM
To: DEQ Jennifer Wigal (WIGAL.Jennifer@deq.state.or.us)
Cc: Greg Aldrich (aldrich.greg@deq.state.or.us); 'KNIGHT William'
Subject: Blue Ribbon small group work session follow up, 11/17/2014

To: Jennifer Wigal, Surface Water Program Manager

From: Dale Feik, Washington County Citizen Action Network, air quality committee chair

Re: Blue Ribbon Follow up from work session, 11/17/2014

I support the permit staff's identified items to improve the permit issuance problem. I like the time line listed also. In my ranking of my priorities Nov 17, I came up with a similar priority list but not with the clarity of DEQ staff.

Lobbying to get only a 2.9% increase in staffing to do this work, and then being told by Commissioner Colleen Johnson that improvements are expected while many members of the Blue Ribbon Committee openly oppose the funding as well as ways to improve permit issuance seems very counterproductive to your mission – protecting and restoring Oregon's waters while carrying out the federal Clean Water Act. I am particularly concerned about DEQ's permitting program that protects Oregon's waters from pollution discharged by "point sources", wastewater into surface water or onto land through a pipe or a discernible channel; following EPA "Point Source" rules is mandatory in order to protect and restore our waters.

The Electronic Date Delivery (EDD) seems critical to meet deadlines and to get permits issued in a timely manner. EDD would help Integrate multiply water quality programs as well as applicable programs that focus on air and land quality; for instance, coordinating the writing of air and water permits of large industrial polluters like Intel.

Intel has an Industrial Wastewater Discharge Permit, number 133207, Ronler Acres effective Feb 7, 2013 through Dec 30, 2017. Most of the extremely hazardous/corrosive substances need a coordinated permitting effort in order to protect and improve the water and air sheds.

Ronler Acres air permit has not been written/approved and, based upon changes in quantity and kind of substances at the two three billion dollar fab plants, chances are the wastewater permit should also be reviewed, especially since the Industrial Wastewater Discharge Permit number 133018 for Aloha Campus effective July 19, 2010 through Nov. 22, 2014 will be out of compliance in 4 days. More importantly Intel has applied for only one air permit for all of the 7 Intel sites in Washington County. Would this also be true of the Wastewater permits?

At Aloha, two Point Sources are listed on the Discharge permit, one to a 24' public sanitary line, and the other to a 10" public sewer. At Ronler Acres, only one Source Point is listed (Combined Compliance Point) that leads to the Sewer/CWS. (The maps and description on the permits however do not mention Jones Farms and Hawthorne Farms, both of which have Wastewater Discharges.) Under the 'Specific

discharge Prohibitions' section it states that Heated Wastewater cannot be greater than 104 deg F at its point of entry into the Publicly Owned Treatment Works. I can understand why temperature is the number one problem for Intel and other semi-conductor manufacturing plants and other types of plants. The Aloha permit states that Ronler Acres is permitting an average of 5,740,439 gallons per day. Cooling that much water starting at 104 deg F, and also meeting EPA water temperature rules is the challenge. Maybe the 104 deg F number should be lower. Aloha's average is 790,000 gallons per day.

To summarize: I support the following staff identified items to improve Permit Issuance. Please let me know how I can read about "EPA's disapproval of temperature natural conditions provision".

<http://www.oregon.gov/deq/WQ/Documents/BlueRibbon/1409BRCWorkItems.pdf>