



Pend Oreille County

Board of Commissioners

Karen Skoog
District #1

Mike Manus
District #2

Stephen Kiss
District #3

Crystal Zieske
Clerk of the Board

Phone: 509-447-4119
FAX: 509 447-0595

PO Box 5025
625 W. 4th Street
Newport, WA 99156-5025

E-mail: commissionersoffice@pendoreille.org

October 23, 2018

Grant Pfeifer
Regional Director, Eastern Regional Office
Washington Department of Ecology
4601 N. Monroe
Spokane, WA 99205

Re: Supplement to EIS Scoping, PacWest Silicon

Dear Director Pfeifer:

Thank you again for the opportunity to supply our comments to the record. This document is meant to be a supplemental document to the Scoping/EIS comment document we provided, recognizing that some of the following issues may not directly fall in line with the EIS contents.

As you know, this project is of such a scale and magnitude that we feel some science should be employed in order to satisfy the concerns that many of our constituents are voicing. This may be a bit unorthodox, but we feel that given the circumstances, may not be unwarranted.

In reference to the initial submittal letter from PacWest, wherein they laid out the general desires and operation of their proposed facility, we feel that some scientific methods of data collection should be implemented with regard to specific onsite weather phenomena. We feel an onsite weather station should be employed in order to gather real information with regard to wind direction and atmospheric conditions. As we are currently under an air stagnation advisory, what effects might that present to the emissions emanating from the facility?

What, if any, hazards are potentially present to the City of Newport drinking water wells that are adjacent and down gradient to the proposed facility? With the total number of users numbering around 2,000 people, it may be prudent to assess groundwater impacts based on the proposed project to help minimize potential for introduction of contaminants to the water supply.

There is an enormous amount of earthwork that will be associated with the proposal, both on and off site. Given the necessary construction of an access road, the possibility of constructing a rail access, and then the site coverage of +/- 70%, temporary and permanent stormwater facilities are of extreme importance. The removal of that volume of vegetation combined with the altering of natural drainage

patterns, may present some real challenges. We must keep in mind that potentially taking that area of overland sheet flow and possibly creating numerous point load locations could present some real potential for damage. None of us want to see the hillsides scoured by concentrated run off, but we equally don't want to create ponding that might be conducive to mosquito breeding areas. As a counterpart to construction, and in conjunction with the earthwork, dust abatement measures during construction should also be employed.

With regard to the import of raw materials to the site, special consideration should be given to potential airborne particulates associated with the transfer of materials from a rail car to whatever type of receiving bin they will be moved to, as well as the motions of the machinery to accomplish those tasks.

We recognize that there will be some regulatory overlap between your function on this project and ours, but we don't have the man-power, equipment, or expertise to measure potential occurrences of fugitive dust or to monitor those events should they arise. We can certainly place numerous conditions of approval on the proposal, and will depend upon Department of Ecology for enforcement.

We would again like to thank you for the opportunity to comment. We appreciate your efforts.

Sincerely,

PEND OREILLE COUNTY
BOARD OF COMMISSIONERS



Stephen Kiss, Chair



Mike Manus, Vice-Chair



Karen Skoog, Commissioner