

350 Spokane  
3418 S. Grand Blvd  
Spokane, WA 99203

02/26/2018

Grant Pfeifer  
Washington State Department of Ecology  
4601 N. Monroe  
Spokane, WA 99205-1295

Dear Mr. Pfeifer,

HiTest Sands LLC has proposed to build a silicon metal smelter near Newport, WA. 350 Spokane, a local chapter of international climate activist organization 350.org, supports the Kalispel Tribe's concerns regarding the HiTest smelter. We find the documents submitted by HiTest to be lacking in critical localized detail and data.

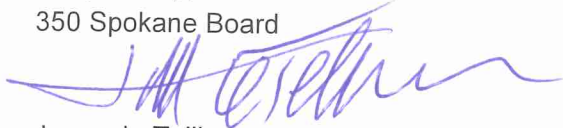
The air quality model that HiTest has provided was generated using a general criteria and data set that is not applicable to the Pend Oreille River Valley area of Newport. There are many unique localized conditions that create a micro climate scenario and a valid air quality model must be based on site specific historical data. For example, during the winter months there are often low pressure air inversions. HiTest has downplayed the air pollutants associated with this smelting process. These include Carbon Monoxide (CO), Carbon Dioxide (CO<sub>2</sub>), Ozone (O<sub>3</sub>), Sulfur Dioxide (SO<sub>2</sub>), Nitrogen Dioxide (NO<sub>2</sub>), and Inhalable Particulate Matter (PM<sub>2.5</sub> & PM<sub>10</sub>) which will combine and create a toxic soup (smog). This smog will be pushed and held at ground level during these periods of air inversion for several days or often weeks. There is substantial scientific evidence showing a myriad of illnesses attributed to breathing smog. During times of high air pressure this smog plume will be carried across North Idaho and into Western Montana where air inversions also occur frequently in the valleys.

Apart from air quality issues, the smelting process will generate waste products in the form of particulates collected in the baghouse, and ash from burning coal and wood. The HiTest documents indicate it takes 6 tons of raw materials, including 2.5 tons quartz sand, 2 tons wood chips, and 0.8 tons coal, to produce 1 ton of silicon metal. HiTest projects production of 60,000 tons of silicon metal annually which translates into 360,000 tons of raw materials annually. Burning a combined 168,000 tons of coal and wood annually will produce great quantities of ash. Disposal of the ash and baghouse particulates will be a major environmental hurdle that must be addressed.

The mission of Washington State Department of Ecology is to protect, preserve, and enhance Washington's land, air, and water for current and future generations. 350 Spokane does not feel that any sort of expedited permitting process of this complex project serves this mission. We ask for a complete and thorough evaluation of the environmental impacts on the land, air, water, and residents to determine if this smelter is suited to the geographics of this area.

350 Spokane believes anything less than this would be a breach of the public trust that Washington residents and tribal nations place in the Department of Ecology.

Respectfully,  
350 Spokane Board

A handwritten signature in blue ink, appearing to read "James LeTellier", with a long horizontal flourish extending to the right.

James LeTellier  
Board Member