

The Social Environmental and Indigenous Justice (SEIJ) prepared a press release dated December 6, 2019 regarding the Mendocino Forest Products pellet facility located in Calpella, CA.

Mendocino Forest Products found a number of comments that would benefit from additional correction, clarification or commentary which are presented on the right side of the page in green italics.

Substantial factual information on Mendocino and Humboldt Redwood forests and its practices are available at www.MendoCo.com. Wherever possible we have provided direct links to specific material on our website to help the readers have easy access.

<p>Text of Press Release <i>Text of article begins below, spaces placed to allow facts to line up with text of article.</i></p>	<p><i>Facts from Mendocino Forest Products</i></p>
<p>[BEGINNING OF PRESS RELEASE]</p> <p>Date: December 6, 2019</p> <p>For immediate and continuous release</p> <p>From: Social Environmental and Indigenous Justice (SEIJ)</p> <p>Re: Urgent need for public to be informed by the County and the Air Quality Management District as to the ongoing and uncorrected hazardous pollution being emitted from the Mendocino Forest Product's Wood Pellet Production Plant in Calpella, CA located close to two elementary schools and Indian Health clinic and the Coyote Valley reservation.</p> <p>Contact person: Polly Girvin 707 485-2604</p> <p>From the press release accompanying the opening of the Mendocino Forest Product's (MFP) wood pellet production plant in Calpella the company owners stated:</p> <p>[PRESS RELEASE CONTINUES BELOW]</p>	<p>Mendocino Forest Products (MFP) obtained an Authority To Construct permit from the local Air Quality Management District (AQMD) to construct the pellet facility. After construction, during normal tuning and testing, there were difficulties meeting the emission limits of the permit so the facility voluntarily reduced production to always remain below allowable emission limits . MFP and AQMD agreed to this while MFP invested in additional control technology and demonstrated the ability to operate consistently below allowable limits. This has been completed. Tests reveal that allowable emissions limits are now being met at full production. A Source Test Report has been submitted to AQMD with these findings. AQMD is in the process of reviewing the report but have reported they are pleased with the summary page. If AQMD agrees all emission standards are now met, they will be issuing an Operating Permit in the near future.</p>

"The plant will produce between 1.5 million and 1.75 million 40 pound bags of pellets each year (30,000 to 35,000 tons annually).

In the past year huge piles of small logs at the Mendocino Redwood Company's log deck on North State Street were chipped into sawdust and transported for use at the Mendocino Forest Product's wood pellet production plant and a huge plume of smoke has been emitted from the plant on nearly a daily basis. Since this plant is close to an elementary school and a health clinic to which tribal members from 10 tribes with compromised health issues attend, it is urgent for the public to pursue inquiries with the Air Quality Management District regarding the pollutant levels being emitted from the plant.

Polly Girvin, a SEIJ member, has spoken with the Director of the Air Quality Management District on the phone and at one office visit and found that:

The MRC plant has been found three times to be in violation of the operation permit it was issued by the Air Quality Management District due to impermissible levels of particulate matter pollution spewing from the plant's smokestack, and recently MRC was once again found to be emitting impermissible levels of pollutants. All attempts to date to sufficiently lower pollution emanating from the plant to permissible levels have failed

- The first violation of the permit was not found to be sufficiently corrected after the installation of a hammermill.
- A second violation occurred and as a mitigation measure MRC was made to install "monitoring technology" by the elementary school. Not sure if this monitoring device is by the Calpella Elementary School or the Waldorf School
- At one point the uncorrected pollution levels were so grave that the plant had to reduce its production rate in order to comply with Particulate Matter emission rate limits specified in the permit issued for the plant by the Air Quality Management District.

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All logs at the deck on North State Street are milled for lumber at the sawmill at the same location. Mill residuals such as sawdust are then shipped to the pellet facility to create pellets.

The plume that emits from the pellet facility is water vapor that has been found to be in compliance with allowable emissions limits at full production. A Source Test Report has been submitted to AQMD with these findings. AQMD is in the process of reviewing the report but have reported they are pleased with the summary page.

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The monitoring technology was installed near the Calpella Elementary School by the AQMD and is monitored by them.

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- A third violation occurred recently and the report regarding this violation was "under review" when Ms. Girvin spoke with the Air Quality Management District Director.

The Air Quality Management District Director informed Ms. Girvin that to address the third permit violation MFP is now being required to install software technology in an attempt to make more uniform the size of pellets being burned. Non uniformity of particulate matter increases pollution emission.

Research results pertaining to the toxicity of wood pellet plant emission are as follows:

Environmental Impacts

Pellet production facilities release dangerous air pollutants including particulate matter and volatile organic compounds putting surrounding communities at higher risk for health complications.

"EIP's survey reveals that these facilities emit dangerous amounts of air pollution and further finds that state agencies consistently fall well short of their duty to ensure that these facilities control their pollution to the levels required by law, frequently due to misleading information supplied by the industry.

Main source of information "is the drying process, as burning wood emits substantial amounts of fine particulate matter, carbon monoxide, nitrogen oxides and greenhouse gases".

[PRESS RELEASE CONTINUES BELOW]

ability to operate consistently below allowable limits. This has been completed.

Tests reveal emissions standards can now be met at full production. A Source Test Report has been submitted to AQMD with these findings. AQMD is in the process of reviewing the report but have reported they are pleased with the summary page. If AQMD agrees all emission standards are now met, they will be issuing an Operating Permit in the near future.

The source of the research quoted here comes from a document prepared by the Rachel Carson Council, a national environmental organization, titled "*Clear Cut: Wood Pellet Production, the Destruction of Forests, and the Case for Environmental Justice*". This paper focuses on pellet manufacturing in South Carolina. Emissions standards are significantly more stringent in California. It is important to note the forests in Mendocino County are sustainably managed for lumber production. Only the waste material from the milling process is used to create pellets.

The Environmental Integrity Project (EIP) produced a document in 2018 titled "*Dirty Deception: How the Wood Biomass Industry Skirts the Clean Air Act*", from which this language has been quoted. This document looked at a number of facilities in the US South only. Emissions standards are significantly more stringent in California. It is important to note the forests in Mendocino County are sustainably managed for lumber production. Only the waste material from the milling process is used to create pellets.

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<p>Health Impacts</p> <p>"When wood pellets are first processed or chipped in mills, they release heavy amounts of carbon dioxide and harmful pollutants."</p> <p>"The processing and burning of wood pellets creates Volatile Compounds (VOC's), particulate matter (PM), nitrogen oxide (NO) and carbon monoxide, all of which are detrimental to health".</p> <p>MOST IMPORTANTLY FOR CHILDREN ATTENDING TWO ELEMENTARY SCHOOLS VERY CLOSE TO THE PLANT</p> <p>"Risk from air-borne pollutants which can cause or worsen cardiovascular and respiratory issues and cancers. Long term exposure too many of these pollutants especially acetaldehyde and methanol can also cause chronic symptoms and harm early childhood development.</p> <p>"Multiple lines of evidence suggest that short-term exposure to elevated levels of biomass combustion products could increase the risk of respiratory health issues. PM2.5 consists of airborne particles less than 2.5 micrometers which can pass deep into a person's lungs and even into the bloodstream, causing heart attacks, decreased lung function, worsening asthma symptoms, and premature death. Many wood pellet mills frequently emit 60 to 80 tons per year of PM2.5 even after installing controls.</p> <p>Breathing ozone created by wood pellet facilities "can trigger a variety of health problems, particularly to children, the elderly and people of all ages who have lung diseases such as asthma".</p> <p>SEIJ urges the Mendocino County Community and the recently appointed Mendocino County Climate Change Advisory Council to join us in investigating Mendocino Forest Product's wood pellet plant's</p> <p>[PRESS RELEASE CONTINUES BELOW]</p>	<p>to note the forests in Mendocino County are sustainably managed for lumber production. Only the waste material from the milling process is used to create pellets. Emissions standards are significantly more stringent in California.</p> <p>The Source Test Report submitted to AQMD shows compliance with all emissions limits at full production.</p> <p>The source of the research quoted here comes from a document prepared by the Rachel Carson Council, a national environmental organization, titled "<i>Clear Cut: Wood Pellet Production, the Destruction of Forests, and the Case for Environmental Justice</i>". This paper focuses on pellet manufacturing in South Carolina. Emissions standards are significantly more stringent in California. The pellet plant does not emit acetaldehyde or methanol.</p> <p>The Environmental Integrity Project (EIP) produced a document in 2018 titled "<i>Dirty Deception: How the Wood Biomass Industry Skirts the Clean Air Act</i>", from which this language has been quoted. This document looked at a number of very large facilities in the US South only. Emissions standards are significantly more stringent in California. MFP's permit with AQMD requires a maximum PM^{2.5} emission rate of 4.8 tons per year. MFP is currently operating at 2 tons per year, compared to the 60 to 80 tons per year quoted in this document.</p> <p>Mendocino Forest Products (MFP) obtained an Authority To Construct permit from the local Air Quality Management District (AQMD) to construct the pellet facility. After construction, during normal tuning and testing, there were difficulties meeting the emission limits of the permit so the facility voluntarily reduced</p>
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particulate matter pollution levels that have to date found to be outside of the boundaries set forth in the permit issued for the facility. Of further concern, Supervisor McGowan in referencing the permit issued for the company indicated the plant is in an area zoned as industrial. This zoning designation should not allow for higher levels of pollution to be emitted from the plant given the proximity of two schools, an Indian Health Clinic and a Tribe.

Attached are scientific research papers which can be referenced for a more detailed discussion of the harmful health and environmental impacts of pollution emitted from wood pellet production plants.

[END OF PRESS RELEASE]

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