NOC Order of Approval No. 11386

Comments and Responses

Appendix A:

A.1 Introduction

A.2 Comment Responses

A.3 Comment Summary Table

NOC Order of Approval No. 11386

Appendix A.1: Introduction

Puget Sound Clean Air Agency (the Agency) would like to thank the Tribes, government agencies, business and community organizations, and individuals for taking the time to review Proposed Order of Approval No. 11386, attend the August 27, 2019 public hearing, and submit comments to the Agency on the Proposed Order of Approval. This Appendix to Order of Approval No. 11386 contains comments on the Proposed Order of Approval and Agency responses to the comments received by the Agency within the comment period.

How do I find my comment and response?
Access an electronic version on the Agency's website:
http://www.pscleanair.org/460/Current-Permitting-Projects

1. Refer to **Appendix A.1: Introduction** for an overview of the comment receipt and response procedure.
2. If you submitted a comment, use the keyboard "Search" shortcut (Ctrl-F) to locate your last name in the electronic version of **Appendix A.3: Comment Summary Table**. The lists of issues associated with your comment(s) are presented in the table.
3. Refer to **Appendix A.2: Comment Responses**, which are organized by issue to locate the responses relevant to your concerns. Due to the overlap between many issues, it may be informative to read responses to issues that are not listed by your name in Appendix A.3.
4. To view comments received by the Agency, refer to **Appendix B: Comment Database**.
5. To view petitions received by the Agency, refer to **Appendix C: Petitions**.

On July 22, 2019, the Agency issued Proposed Order of Approval No. 11386 and began a 45-day comment period, with a public hearing on August 27, 2019. Notice of the Proposed Order of Approval availability, public hearing, and comment period was published in the Daily Journal of Commerce and the Tacoma News Tribune, sent to all parties on the project list serve, and published on the Agency's website with applicable supporting materials, including the NOC Engineering Review Worksheet. Release of the Proposed Order of Approval was also featured in local news stories. Paper copies of the Proposed Order of Approval were available at the public hearing, and were available for pickup at the Agency's office for the duration of the comment period.

The comment period on Proposed Order of Approval No. 11386 closed September 9, 2019. At the conclusion of the comment period, PSCAA had received approximately 9,765 comments from the public in the form of email, paper, fax, and oral testimony. Two petitions containing approximately 4,000 electronic signatures and 950 additional comments were received in paper form. Additionally, one partially printed copy and one full electronic copy of an online petition containing 68,200+ signatures, 336 pages of comments, and 85 pages of petition updates was received. Pursuant to dates on the petition, much of it appeared to be compiled before the Proposed Order of Approval was released on July 22, 2019; however, the Agency received the petition as a comment and has reviewed and responded to it as such.

Comment Response Process

Comments received by the Agency during the comment period fell into three general categories across all mediums: Unique, Form Letters, and Petitions. All comments received in all categories were evaluated on whether the subject matter was substantive in relation to the Proposed Order of Approval and the NOC Engineering Review Worksheet. Substantive comments generally are those that relate to the accuracy, contents, methodology, or assumptions used in either document. They can also present new information relevant to either document. Substantive comments may or may not lead to changes in the Order of Approval or NOC Engineering Review Worksheet.

In accordance with Agency Regulation I, Section 6.03, substantive comments were considered and responded to as follows:

- The Agency's project team carefully reviewed the comments received and sorted the comments by submittal method, whether the comment was substantive, and the comment's relevancy to the scope of the Proposed Order of Approval and NOC Engineering Review Worksheet. Substantive comments were then grouped by shared common topic areas and responses were prepared. Some topic areas, grouped by issue, overlapped with others; for this reason, commenters are encouraged to look for responses beyond their topic area for information relevant to their concerns.
- In response to the comments, the Order of Approval and NOC Engineering Review Worksheet were then updated with new information, revised and/or new permit conditions and clarifying language as needed. Responses also identify, as appropriate, sections of the Order of Approval where revisions were made or details on where additional information is provided within the Order of Approval, or an explanation for why a comment did not warrant a change.

In summary, the comments received on Proposed Order of Approval No. 11386 have resulted in some technical edits that clarify some proposed permit conditions and/or provide new conditions. For more information on changes that were made to the Order of Approval, please see the Final NOC Engineering Review Worksheet.

The Agency received many form emails, letters, and petitions, but those comments are not presented in their entirety in Appendix B: Comment Database. Instead, a summary of issues associated with each form comment and petition is contained in Appendix A.3: Comment Summary Table, and in Response 17. Examples of each form comment are presented in Appendix B with a list of stakeholders who submitted form comment. Stakeholders that signed a petition are listed on the petitions themselves, which can be found in Appendix C. Comments submitted that were not generally form emails, letters, or petitions (unique comments), are located in Appendix B.

Appendix Content

Appendix A.2: Comment Responses

Comment responses are organized numerically by topic area, or issue. Refer to Appendix A.3 for the list of issues associated with your comment(s). The "Comment Response Process" section above contains an overview of the comment response process. Because some topic areas and

issues overlapped with others, commenters are encouraged to look at responses beyond their topic area for information relevant to their concerns.

Please note that the Agency generated a separate response for form letters and petitions, Response 17. The petitions submitted to the Agency contained many comments that appeared to be generated prior to the beginning of the public comment period for the Proposed Order of Approval on July 22, 2019, but those comments were considered under the process described above.

Appendix A.3: Comment Summary Table

The comment summary table is a list of all participants who submitted unique comments to the Agency during the public commenting process and the issues associated with each comment. The comment summary table is organized in alphabetical order by name for Tribal, Federal, State, or Organizations. For groups of individuals, comments are organized by the last name and first initial of the first commenter. For individuals, comments are organized by last name and first initial. All comments are tagged with a unique comment identification number. Commenters who submitted multiple unique letters should refer to the comment number to locate their letters in Appendix B. Additionally, a summary of issues associated with each form comment and petition can also be found at the end of Appendix A.3 and Response 17.

Appendices B and C: Comment Database and Petitions

All unique comments received by the Agency are displayed in Appendix B and are searchable by comment identification number. Comment letters are tagged with the associated issues raised in that letter. Duplicate comments may be presented only once in Appendix B. For a tabular summary of Appendix B, please see the table at Appendix A.3. Petitions are presented in their complete form in Appendix C.

NOC Order of Approval No. 11386

Appendix A.2 Comment Responses

Puget Sound Clean Air Agency thanks all commenters for comments submitted on Proposed Order of Approval No. 11386 and the worksheet supporting it.

1) Permitting Process.

Some comments asked questions about the roles of various Puget Sound Clean Air Agency ("Agency") staff and Board members as they relate to the review, analysis, and possible issuance of a Notice of Construction (NOC) Order of Approval (OOA) (also called a "permit" by the Agency.) Other comments expressed concern or disapproval of the permitting process, the requirements of the process, and opportunities for public input during the process.

The Agency is a municipal corporation pursuant to the Washington Clean Air Act (RCW 70.94 et. seq.) and the permitting authority for air contaminant sources in King, Kitsap, Snohomish and Pierce Counties, including for the proposed Puget Sound Energy (PSE) liquefied natural gas (LNG) facility located at 1001 E. Alexander Ave, Tacoma, WA 98421. Pursuant to the WA Clean Air Act and as stated in Agency Regulation I, § 3.01, the Agency's Board of Directors has appointed a Control Officer, the Agency's Executive Director, to observe and enforce the Agency's regulations, including the regulations related to the permitting of proposed new sources of air contaminants which includes the proposed PSE LNG facility. The Agency's Control Officer has delegated his authority to issue or deny permits to the Agency's Compliance Division Director and the Agency's Manager of Compliance.

The authority and basic requirements for permitting of new sources of air contaminant comes from the WA Clean Air Act. Pursuant to RCW 70.94, the Agency adopted regulations for NOC permitting in Agency Regulation I, Article 6 which also incorporates by reference parts of the Washington state permitting process found in WAC 173-400.

Agency Regulation I, Article 6 states that the Agency shall issue a permit (referred to as an Order of Approval in the rule) if a proposed source will meet all of the following criteria:

- Complies with all applicable federal, state and local air quality regulations,
- Employs Best Available Control Technology (BACT) for all pollutants, and
- Will not cause or contribute to a violation of any ambient air quality standard.

PSE was required to submit a permit application to the Agency (referred to as a Notice of Construction in the regulations) and is required to obtain a permit (referred to as an Order of

Approval) to construct and operate its proposed facility. The Agency received the application from PSE on May 22, 2017, assigned it NOC No. 11386 and posted a notice on the Agency website that the application had been received. The Agency then followed the process in Agency Regulation I, Article 6 to determine if the application was complete, meaning that it contained all the necessary information needed to show whether the proposed facility would meet the requirements to obtain a permit. As is typical in permitting processes before the Agency, additional information was needed for the application to be complete and additional information was requested from PSE on June 21, 2017. After reviewing the additional information received from PSE, the Agency subsequently determined that the application was complete.

After the application was determined to be complete, the Agency hosted two public information meetings to present information about the project and to answer questions about the PSE LNG permit application. These meetings were held on Monday, November 27, 2017 and Friday, December 1, 2017.

With oversight by the Manager of Compliance, an Agency engineer proceeded with a review of PSE's application to determine if the proposed facility would meet all of the applicable requirements to obtain a permit pursuant to Agency Regulation I, Article 6 and generally identified above.

One of the requirements to obtain a permit is that a proposal must employ BACT for all pollutants. BACT is defined in the WA Clean Air Act as:

> "*an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under this chapter emitted from or that results from any new or modified stationary source, that the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such a source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each such a pollutant. In no event shall application of "best available control technology" result in emissions of any pollutants that will exceed the emissions allowed by any applicable standard under 40 C.F.R. Part 60 and Part 61, as they exist on July 25, 1993, or their later enactments as adopted by reference by the director by rule. Emissions from any source utilizing clean fuels, or any other means, to comply with this subsection shall not be allowed to increase above levels that would have been required under the definition of BACT as it existed prior to enactment of the federal clean air act amendments of 1990.*" RCW 70.94.030 (6).

As part of the Agency's review of PSE's application, the Agency was required to and has determined the proposed facility in the application is utilizing BACT and has included appropriate approval conditions to define that determination. Those conditions include the testing, monitoring, recordkeeping and reporting to document ongoing compliance with that determination.

In addition to the permitting requirements, the Agency is also required to ensure that the requirements of the State Environmental Policy Act, ch 43.21C RCW, are met for each permit it issues. For the PSE proposal, a Final Environmental Impact Statement (FEIS) had been issued on December 9, 2015 by the City of Tacoma. After reviewing the FEIS, the Agency determined that an analysis of greenhouse gas (GHG) emissions and impacts in the FEIS included quantitative emissions for the Tacoma LNG facility site, but did not account for "upstream" GHG emissions associated with natural gas extraction and transmission. In addition, the Agency determined that the Washington State Department of Ecology guidance document for the identification and evaluation of GHGs, which the FEIS analysis relied upon, had been withdrawn for revision after completion of the FEIS. The Agency concluded that a "life-cycle" approach to characterizing GHG emissions and impacts was needed and completed a Supplemental EIS (SEIS). The SEIS' life-cycle analysis identified and quantified all GHG emissions associated with natural gas extraction and transmission, on-site LNG production and storage, and "downstream" end-uses of the LNG. The Agency provided public notice and a public comment period, including a public hearing, for the SEIS, considered and addressed all comments and issued a final SEIS on March 29, 2019.

After thorough review of the final SEIS and PSE's application, the Agency made a preliminary determination that the proposed facility would meet all applicable requirements and that a permit could be issued, subject to a set of mandatory conditions that PSE must meet.

The Agency then provided public notice and a public comment period, including a public hearing, for the preliminary determination to issue a NOC Order of Approval to PSE. A public comment period for the draft permit and accompanying worksheet ran from July 22, 2019 to September 9, 2019. The Agency received approximately 9,765 comments from the public in the form of email, paper, fax, and oral testimony. Two petitions containing approximately 4,000 electronic signatures and 950 additional comments were received in paper form. Additionally, one partially printed copy and one full electronic copy of an online petition containing 68,200+ signatures, 336 pages of comments, and 85 pages of petition updates was received. In reviewing and considering those comments, the Agency added or modified certain conditions of the approval and added additional details and/or analysis to the Agency's worksheet. The Agency considered all of the factors as required by the WA Clean Air Act in reviewing PSE's application and preparing the permit issued to PSE with this Response to Comments and in the Agency's Final NOC Engineering Review Worksheet for the permit.

See also SEIS, Appendix C.2 and Responses 2, 3 and 4 in this appendix.

2) Permitting Requirements.

The comments and responses in this category relate to the specific requirements and regulations that the Agency applies when processing a NOC application for the purpose of either issuing or denying a NOC Order of Approval (or NOC permit).

Some comments were received that questioned how or why the Agency would permit a facility that has the potential to emit pollutants as described in the Proposed Order of

Approval and/or questioned whether the best science or evidence was considered in the Agency's review of PSE's NOC application.

Some comments suggested or stated that the Agency did not have enough information about the facility and/or the design of the facility to grant a Proposed Order of Approval.

Some comments suggested or stated that additional information or studies were needed before an Order of Approval should be approved. One example of a suggested study is a Health Impact Assessment.

The Agency respectfully disagrees with the above comments. As identified in Response 1 above, the Agency considered all the information it received in its evaluation of PSE's application under the applicable requirements. In some circumstances, the Agency concluded additional information or analyses was needed and obtained it as needed. In some circumstances, the Agency determined it had sufficient information or analyses to determine whether the application met applicable requirements. At the time of this Response to Comments, the Agency has determined that the information in PSE's application, the City of Tacoma's FEIS, additional information submitted by PSE and the Agency's subsequent analysis (in the SEIS and the Agency's worksheet) demonstrated that PSE's proposal is sufficiently defined and meets all the applicable regulatory requirements to be approved and to receive a permit.

The Agency understands the concerns raised about whether it has used appropriate or current information in reviewing PSE's application (what the commenters appear to refer to generally as "best science"). The Agency believes it has thoroughly and reasonably reviewed all the information and analyses before it and appropriately applied the applicable standards to PSE's application. As stated in Response 1, the WA Clean Air Act's standard applicable to NOC permitting is whether the application meets BACT (Best Available Control Technology). BACT requires the Agency to determine whether the application provides for the "maximum degree of reduction for each air pollutant" based upon a number of considerations, as described in Agency Response 1. BACT is a stringent requirement that all sources subject to NOC review must meet. The NOC application and review process is often referred to as "Minor New Source Review" and the BACT requirement for the program is one that many states do not have. The BACT requirement is one determination that must be met to approve proposed emission increases, which is what the NOC application process is structured to do. In this case, the Agency concludes based upon the extensive information before it (as described below and in the Agency's worksheet) that PSE's application meets BACT. Please also see the SEIS, Appendix C.2 (Agency's Response to Comments).

In addition, the permit only approves what was proposed by PSE and reviewed by the Agency. The permit conditions require the facility to be built and operated according to the plans and specifications used in the permit analysis. The Agency evaluated PSE's application and as is typical in reviewing NOC permits, considered emission related design parameters and incorporated those applicable into the permit conditions. Any changes to the facility that would impact air emissions or would change the result of any analysis previously performed and relied on would require a new permit application to be submitted and additional review conducted by the Agency.

Some comments questioned or expressed concern that the Proposed Order of Approval was based on some equipment or process information that was proposed by the applicant and/or the applicant's consultant (Chicago Bridge & Iron or CB&I), but information on specific equipment was not yet available.

The Agency disagrees that it did not have sufficient information as asserted in this comment. The information used by CB&I to calculate emissions will be verified through enforceable permit conditions such as performance testing and record management after the emission units are purchased and brought on site. The Agency does not require permittees to verify equipment before it has been purchased or built. It is the responsibility of the applicant to purchase equipment that meets all permitting requirements, and then the Agency will verify that all equipment meets permitting requirements. See e.g. draft Permit Conditions 5, 7, 8, 9, 15, 16, 17, 18, 19, and 20.

Some comments stated that the area of the proposed facility has poor air quality and some related comments expressed concern about certain compounds identified as Toxic Air Pollutants (TAPs) and Hazardous Air Pollutants (HAPs).

The Puget Sound region is currently meeting all of the National Ambient Air Quality Standards (NAAQS) as established by the United States Environmental Protection Agency (EPA). NAAQS are established by the EPA as standards for the six criteria pollutants identified in the federal Clean Air Act. The compounds identified in these comments are classified by the EPA as hazardous air pollutants (HAPs) and as toxic air pollutants (TAPs) by Washington State (see *WAC 173-460 Controls for New Sources of Toxic Air Pollutants*). HAPs and TAPs do not have any ambient air quality standards established similar to the NAAQS for criteria pollutants. However, the Agency implements the provisions of WAC 173-460 as part of its NOC application review. That rule includes thresholds for review and impacts from increased emissions of new or modified sources. The compounds identified in these comments are included in that NOC review and were small with respect to the provisions of that TAP review under the rule. Most of the TAP emission estimates were below the "*Small Quantity Emission Rate (SQER)*" defined in the rule. The SQER is a threshold below which applicants are not required to submit dispersion modeling to predict impacts offsite of the project.

There were some compounds in the application review that were above the SQER thresholds. Those compounds were evaluated through dispersion modeling and the impacts were all below the "Acceptable Source Impact Level (ASIL)" defined in WAC 173-460-150. For the TAP emissions which are controlled by the flare operation, their impacts were well below the ASIL value and an increase of their emissions by an order of magnitude (10x) would not change that conclusion. Source impacts below the ASIL values are not subject to further review under the provisions of WAC 173-460. The Agency received comments asking for a Health Impact Assessment / Analysis for this proposal. This type of assessment is not required for this type of permit and was not performed for this application. However, as noted above, the Agency did perform a review of the potential emissions of air toxics as required by the applicable regulations. This analysis showed the impacts from toxic air contaminants to be acceptable under all applicable requirements.

Related to the comment above, another comment expressed concern about PM 2.5 in the area of the proposed facility. This comment stated that the area was not in attainment of NAAQS for PM 2.5 and that the proposed facility should not be allowed to operate due to the potential emissions of PM 2.5. The comment also expressed concern about the production levels of the proposed facility.

The proposed facility area was redesignated by US EPA as attainment for PM2.5 in 2012 and is currently following a maintenance plan.

The calculated potential to emit from the proposed facility was 1.2 tons per year when operating at the permitting level of 250,000 gallons per day of LNG, where the expected actual emissions are less than this amount due to the facility not operating at the maximum permit level every day. The Tacoma LNG project is not allowed to produce more than 250,000 gallons per day, and a new permit condition was added to the draft permit to further enforce this requirement.

Some comments expressed concern about the cumulative impacts of industry in the Port of Tacoma area, and asked how or if cumulative impacts are considered as part of the NOC review process.

The Agency's regulations, including the incorporated provisions of WAC 173-460, do not require consideration of the overall cumulative air pollution at a stationary facility. New legislation would be required in order for the Agency to consider overall cumulative air pollution during an application review for toxics. Cumulative impacts, to the extent identified, were considered in the City of Tacoma's FEIS and the Agency's SEIS.

Some comments questioned the efficiency of the proposed flare, and suggested that the facility be reviewed by the Agency as a major source for Title V Permitting purposes.

The comments about the flare performance appear to be speculative and not supported by engineering information or details. The NOC review concluded that the flare emission control performance would be evaluated through source testing and that was included as a draft permit condition. See more discussion about flare performance and HAPs within this response. The comment also states that the proposed plant could emit HAPs at such a rate to make it a major source. This is inaccurate as the NOC worksheet identified that the total potential HAP emissions for the facility at 740 pounds per year (0.37 tons/yr). The major source definition established by the USEPA is 10 tons/yr for any single HAP emission or 25 tons/yr for a combined HAP emission total. The proposed Tacoma LNG Project is below these thresholds. The evaluation of TAP emissions and their impacts in the community is a component of all new source review in Washington State, regardless of the project size.

Some comments questioned or expressed disapproval of the Agency's determinations regarding the applicability of 40 CFR Part 60, Subparts LLL and KKK and OOOOa.

All three of the New Source Performance Standards cited in the comments - 40 CFR 60 Subpart LLL , 40 CFR 60 Subpart KKK and 40 CFR 60 Subpart OOOOa - regulate the "Oil

and Natural Gas" sector. Within this sector they regulate natural gas processing plants as well as other parts of the natural gas sector.

The applicability of Subparts LLL and KKK is limited to facilities that began construction after January 20, 1984, and on or before August 23, 2011. The PSE LNG facility did not begin construction between these dates and is not subject to either of these rules.

In addition to being outside the date range of the applicability of Subparts LLL and KKK, the PSE LNG facility is not within the Oil and Natural Gas sector and is not a "natural gas processing plant" for the purposes of these rules. In the supporting information published in the Federal Register by EPA when they proposed NSPS KKK and LLL there are descriptions of what these terms include. Below is an excerpt from this Federal Register notice (76 FR 52737), published 8/23/2011, Titled, "Oil and Natural Gas Sector: New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants Reviews."

The oil and natural gas sector is described in the Federal Register as:

> *"The oil and natural gas operations can generally be separated into four segments: (1) Oil and natural gas production, (2) natural gas processing, (3) natural gas transmission and (4) natural gas distribution."*

Further description of the oil and natural sector is included in the technical support document (TSD) for the 2011 publication of the proposed NSPS KKK and LLL, titled "Oil and Natural Gas Sector: Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution. Background Technical Support Document for Proposed Standards" dated July 2011, EPA document number EPA-453/R-11-002. The TSD includes a chapter entitled, "Oil and Natural Gas Sector Overview" which includes the description of the sector being regulated and is summarized here (taken from pages 2-1 to 2-3 of this document):

> *"The oil and natural gas sector includes operations involved in the extraction and production of oil and natural gas, as well as the processing, transmissions and distribution of natural gas…For natural gas, the sector includes all operations from the well to the customer. The oil and natural gas operations can generally be separated into four segments: (1) oil and natural gas production, (2) natural gas processing, (3) natural gas transmission and (4) natural gas distribution…Natural gas processing consists of separating certain hydrocarbons and fluids from the natural gas to produced "pipeline quality" dry natural gas. While some of the processing can be accomplished in the production segment, the complete processing of natural gas takes place in the natural gas processing segment. The pipeline quality natural gas leaves the processing segment and enters the transmission segment. The distribution segment is the final step in delivering natural gas to customers. The natural gas enters the distribution segment from delivery points located on interstate and intrastate transmission pipelines to business and household customers…Natural gas distribution systems consist of thousands of miles of piping, including mains and service pipelines to customers."*

It is clear that the "Natural Gas Sector" extends from the natural gas wells to the distribution system, but not beyond, and "natural gas processing" as used in the rule, is the step between the production of the natural gas at the well and before it goes into the transmission line as "pipeline quality." The PSE LNG facility is receiving pipeline quality natural gas that has

already been processed and delivered to the facility through the transmission and distribution segments. The facility is outside the sector being regulated and specifically is not a natural gas processing facility for the purposes of these rules.

In relation to the federal rules discussed above, a comment further stated or suggested that 40 CFR Subpart OOOOa would apply to the PSE LNG facility and that the Agency drew an incorrect conclusion in stating that the facility was downstream of the local distribution company custody transfer station. The comment expressed concern that the Draft Order of Approval did not include requirements found in Subpart OOOOa.

NSPS OOOOa titled, "Standards Of Performance For Crude Oil And Natural Gas Facilities For Which Construction, Modification, Or Reconstruction Commenced After September 18, 2015" was most recently finalized in 2016 (81 FR 35824). The final rule regulates emissions from, "affected facilities in the crude oil and natural gas source category." [See 40 CFR 60.5360a(a)]. This source category is defined in the rule as:

> "*Crude oil and natural gas source category* means:
>
> (1) Crude oil production, which includes the well and extends to the point of custody transfer to the crude oil transmission pipeline or any other forms of transportation; and
>
> (2) Natural gas production, processing, transmission, and storage, which include the well and extend to, but do not include, the local distribution company custody transfer station."

Local distribution company custody transfer station is also defined in the rule as:

> *"Local distribution company (LDC) custody transfer station* means a metering station where the LDC receives a natural gas supply from an upstream supplier, which may be an interstate transmission pipeline or a local natural gas producer, for delivery to customers through the LDC's intrastate transmission or distribution lines."

The LDC custody transfer stations for PSE are at the points where they take custody from the high pressure transmission line (*see* Section 3.5.4.2 of the FEIS). The PSE LNG facility is located downstream of the local distribution company custody transfer station and is not included in the "natural gas source category" for the purposes of applicability of NSPS OOOOa.

Some comments questioned or expressed disapproval of the Agency's determinations regarding the applicability of 40 CFR Part 63, Subpart Y.

40 CFR 63 Subpart Y--National Emission Standards For Marine Tank Vessel Loading Operations are not applicable to the PSE LNG facility because they are not an affected source as defined in this rule.

Subpart Y has two parts, one regulating hazardous air pollutants (MACT standards) and one regulating criteria air pollutants (RACT standards). The MACT standards are applicable only to major new and existing sources of hazardous air pollutants. As determined in the Agency's analysis of the information provided by PSE in the permit application the PSE LNG facility is

not a major source of hazardous air pollutants. The RACT standards are applicable only to facilities that load gasoline or crude oil. The PSE LNG facility is not proposed to load gasoline or crude oil and the permit does not approve this activity.

Some comments stated or suggested that the Agency should have required the applicant to prepare and/or submit a risk management plan or other hazard management plans as described in 40 CFR part 68, as part of the Agency's NOC application process.

The PSE liquefied natural gas facility does not meet the definition of "stationary source" as described in 40 CFR Part 68 and is not subject to the rule. Liquefied natural gas facilities that are subject to other specific federal or state requirements are exempt from the definition of stationary source in 40 CFR Part 68 and exempt from all requirements of the rule. The PSE LNG facility is subject to 49 CFR 193 and, does not meet the definition of "stationary source" in the rule and is not subject to the rule.

The definition of stationary source in 40 CFR Part 68 is:

> "any buildings, structures, equipment, installations, or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control), and from which an accidental release may occur. *The term stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part.* A stationary source includes transportation containers used for storage not incident to transportation and transportation containers connected to equipment at a stationary source for loading or unloading. *Transportation includes, but is not limited to, transportation subject to oversight or regulation under 49 CFR parts 192, 193, or 195, or a state natural gas or hazardous liquid program for which the state has in effect a certification to DOT under 49 U.S.C. section 60105.* A stationary source does not include naturally occurring hydrocarbon reservoirs. Properties shall not be considered contiguous solely because of a railroad or pipeline right-of-way."

The preamble in the Federal Register notice finalizing this rule (see 63 FR 640) includes this:

> "The transportation exemption also applies to liquefied natural gas (LNG) facilities subject to oversight or regulation under 49 CFR parts 192, 193, or 195, or a state natural gas or hazardous liquid program for which the state has in effect a certification to DOT under 49 U.S.C. section 60105. These facilities include those used to liquefy natural or synthetic gas or used to transfer, store, or vaporize LNG in conjunction with pipeline transportation."

Some comments asked if "proprietary chemicals" would be emitted from the facility. Other similar comments provided lists of chemicals, some related to hydraulic fracturing, and asked which were expected to be present at or emitted by the facility.

It is unclear what is meant by "proprietary chemicals" in these comments. All potential air pollutants emitted by the facility were evaluated in the worksheet and are shown in the emission calculation spreadsheet as an attachment. As required under Regulation I Article 5 Section 5.05(b), the facility will be required to monitor and annually report air contaminants emitted above their respective regulatory thresholds to the Agency for review. In regards to the public knowing if they are safe amounts; all pollutants to be emitted were below regulatory thresholds found in WAC 173-400-150. All of the emissions analyzed in the worksheet are from the facility as a stationary source and do not include emissions associated with mobile sources such as ships or trucks.

Some comments stated that the project will exacerbate existing environmental injustices and that operation of the Tacoma LNG facility would expose the South Sound community to grave safety risks from explosion hazards, and toxic air pollutant emissions and should be denied on that basis.

As discussed in the NOC Engineering Review Worksheet and the Final SEIS, PSE's application for the LNG facility, as conditioned, will:

- Comply with all applicable air quality regulations for operations onsite;
- Use Best Available Control Technology for criteria pollutants and TAPS/HAPS;
- Not contribute to any exceedance of an ambient air quality standard;
- Not exceed any Acceptable Source Impact Levels (ASILs) defined for TAP impacts; and
- Result in a small reduction in GHG emissions.

Based on that, there is not expected to be any significant, disproportionate effects as suggested by these comments. Non-air impacts were addressed in the City of Tacoma's FEIS which included chapters on health and safety (including hazard risks), socio-economic impacts, and impacts to land uses and cultural resources. The FEIS was not timely appealed by any appellant and those non-air impacts are not before the Agency. Finally, while the Agency pursues policies and programs to reduce environmental injustices, the Agency does not have the authority to delay or deny a NOC application or to amend the WA Clean Air Act to add a regulatory requirement, or a basis for denial, as these comments appear to request. Some comments referred to EPA documents on environmental justice, which identified a focus on "*enforcement and compliance assurance activities*" in affected communities. This illustrates that the EPA also works on these objectives within the legal mandates associated with application-specific decisions. [See also SEIS, Appendix C.2 and Responses 1, 2 and 4 in this appendix.]

Some comments expressed concern or opposition to hydraulic fracturing and other fossil fuel extraction methods and the effects of those methods on the surrounding environment. The Agency also received several comments and questions about the proposed facility or its operations that were outside the scope of the proposed OOA including, but not limited to,

storage of hazardous materials, health effects of chemicals and processes not found in LNG, questions regarding jurisdiction and/or policies other public entities, and other questions outside the jurisdiction of the Agency.

Natural gas extraction methods are outside the scope of this permitting action since this activity is not being proposed to be conducted at the proposed facility. In addition, the effect natural gas extraction methods and/or natural gas itself would have on the environment or human health, are also not proposed in the application before the Agency and outside of the scope of the Agency's review. Finally, the Agency does not have the ability to comment on the jurisdiction or policies or other governmental entities as part of this NOC application review.

Some comments suggest that Agency permitting decisions and actions should be based on "moral responsibility" and should factor in elements of the Agency's mission and its *2014-2020 Strategic Plan*.

The Agency's mission and Strategic Plan identify goals and areas where resources may be directed for planning purposes by the Agency. However, neither the Agency's mission, nor its Strategic Plan negates or overrides the NOC permitting and SEPA requirements the Agency must follow.

See also Responses 1, 3 and 4 in this appendix.

3) Specific Permit Conditions.

The comments and responses in this category relate to the permit conditions in the Proposed Order of Approval. The Agency received comments that expressed concern or disapproval of specific permit conditions as drafted. Other comments suggested modifications to certain proposed permit conditions.

Some comments questioned the whether the Proposed Order of Approval was based on a plant capacity of 500,000 or 250,000 gallons of LNG per day.

The draft permit included the following permit condition:

Draft Permit Condition 1:

> *"Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the installation address in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency."*

This condition requires the applicant to install and operate equipment as presented in the permit application. An additional permit condition has been added that specifically limits the facility to the 250,000 gallons of LNG per day, as this was what PSE presented in its application and what the Agency evaluated in terms of emission estimates. See permit

condition 33.

Some comments suggested or stated that the proposed permit condition regulating the source of gas for the facility is not realistic, or would not be legal and enforceable.

The Agency disagrees with comments that the proposed permit condition regarding the source of the natural gas for the project is not "*legal and enforceable*" and has previously responded as such (see *FSEIS, Appendix C.2 – Response to Comments, Response Category 13*). PSE also has voluntarily agreed to the inclusion of this condition for its application. Some comments also suggest that PSE could use natural gas from sources other than Canada to replace this fuel. This is not an accurate statement regarding the application at issue and the permit conditions identified for this topic. There are no other PSE projects using natural gas that have been proposed or are before the Agency for review.

Regarding enforcement, the Agency does not specify future actions or outcomes as permit conditions. Any future enforcement action taken will depend on the specific facts, will be evaluated on a case-by-case basis, and will follow the Agency's procedures for enforcement case processing.

A comment expressed concern about the flare destruction efficiency assumption used in Proposed Order of Approval Condition #15, specifically regarding the phrase "compounds up to 3 carbons" for Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). This comment expressed further concern that the flare destruction efficiency of 99% for VOCs and HAPs is too high and/or unsupported and that the 10 ppm outlet limit concentration alternative was not specifically used to calculate all emissions of VOCs and HAPs.

The Agency agrees with the comment that emission calculations were assumed to all have 99% destruction efficiency for all VOCs and HAPs/TAPs and that emissions were not calculated at 10 ppm for all VOCs and HAPs and has therefore changed draft permit condition 15 to include all VOCs, not just those up to 3 carbons, and removed the alternative 10 ppm limit. Additionally, draft permit condition 21 requires performance testing to verify the destruction efficiency for all VOCs. In regards to the comments that expressed concern that the Proposed Order Of Approval does not require direct and continuous testing at the inlet and the outlet to determine the control efficiency, the Agency has placed a performance testing requirement in the permit which would require sampling at the inlet and outlet to determine the destruction efficiency. After performance testing, temperature is used as a continuous monitoring parameter to indicate that the control efficiency is at the same level as was shown during the performance testing.

A comment expressed concern that the phrase "good combustion practices" did not have a specific definition as it relates to Best Available Control Technology (BACT).

Good combustion practice does not need to be defined since there are corresponding BACT emission limitations that were placed in the permit. These BACT limits will be performance

tested on a periodic basis to ensure that the applicant is meeting these limits**.** See Draft Permit Conditions 5, 7, 8, 9, 15, 16, 17, 18, 19, and 20.

Comments were received that expressed concern or disapproval regarding the requirements of Leak Detection and Repair (LDAR) as stated in the Proposed Order of Approval, including concerns that frequency monitoring may be too low, LDAR may not take into account material failures, and/or logistical concerns about the number of staff persons employed at the proposed facility as it relates to the LDAR system.

In response to the concerns regarding the monitoring contents of the LDAR, the requirements of the LDAR do include component failures and fatigue. The reduced frequency for allowable leak checks is only applicable under specific requirements:

- If the overall unit equipment leak rate is 2% or greater, the facility shall monitor monthly.
- For valves only, if the leak rate is 2% or greater the facility may choose to monitor quarterly and implement an alternative monitoring plan equivalent to 40 CFR 63.175(d) or (e).
- If the overall unit equipment leak rate is < 2%, the facility may monitor quarterly.
- If the overall unit equipment leak rate < 1%, the facility may monitor semiannually
- If the overall unit equipment leak rate < 0.5%, the facility may monitor annually

The Agency believes that if there are leak rates at or below the criteria outlined above, the facility does not warrant increased monitoring.

Regarding staffing levels and compliance with LDAR, the Agency sets the requirements for LDAR and other permit conditions; however, it is up to the facility owner and operator to determine how to meet these requirements, whether they are fulfilled by onsite staff or other employees or contractors.

Regarding LDAR as described above, another comment expressed concern regarding the timeframe for repairs. A comment also requested that penalties be stipulated as part of the Order of Approval.

The LDAR provisions were largely taken from the requirements of 40 CFR 63, subpart H. This federal rule requires that the first attempt at repair for most of the components outlined in 40 CFR 63.163 through 40 CFR 63.174 be made within 5 days. For example, monitoring requirements for valves in gas/vapor service outlined in 50 CFR 63.168(f)(2) require the first attempt of leak repair be made no later than 5 days after each leak is detected. The Agency does not specify enforcement actions or outcomes as permit conditions. Any enforcement action taken will depend on the specific facts, will be evaluated on a case-by-case basis, and will follow the Agency's established procedures for enforcement case processing. For more discussion on LDAR, see Response 4 in this appendix.

Comments were received that expressed concern or disapproval of Draft Condition 41 of the Proposed Order of Approval as it relates to odors and the required actions of the facility to handle odor issues, expressing concern about the stated 12 hour timeframe.

Draft Condition 41 requires that the source take immediate action upon receipt of an odor complaint. The condition also requires that the facility take corrective action as soon as possible. The 12-hour timeframe allows the facility time to take appropriate action.

Some comments had several suggestions for specific modifications to proposed permit conditions. Below is a list of these suggestions with Agency responses, as numbered in the Proposed Order of Approval:

Proposed modification for Condition 7: Performance tests of the LNG vaporizer to verify compliance with the stated emissions standards should be conducted annually.

Agency response to proposed modification for Condition 7: The Agency respectfully disagrees with this comment. More frequent performance testing is typically required when a source is approaching a regulatory threshold such as the Title V or Major Source regulatory thresholds. Testing every 5 years is consistent with other testing permits the Agency has issued. Additionally, the vaporizer is only allowed and permitted to operate 10 days a year (240 hours total) which will reduce the total emissions from this unit.

Proposed modification for Condition 12a: A schedule is needed for monitoring of the flare pilot flame; i.e., how often is the flare pilot flame being monitored?

Agency response to proposed modification for Condition 12a: The Agency does not agree that a specific schedule is needed for flare pilot flame monitoring. Draft Permit condition 12a requires that the source continuously monitor for flame presence during normal operation. Each burner is planned to be equipped with pilot detection via thermocouple and UV flame scan monitoring. In the event of a pilot flame loss, an alarm would be triggered and the flare will divert the effluent stream while the flare cycles through a purge cycle to clear the stack and relight the standing pilots with an intermittent pilot ignition system. If the flare cannot reestablish the continuous flame, operators will proceed to shut down the flared sources and the plant will be put into shutdown mode.

Proposed modification for Condition 16: SO2 emission rate of the enclosed ground flare should be tested annually, regardless of previous testing performance.

Agency response to proposed modification for Condition 16: Tiered approach testing, such as the testing outlined in permit condition 16, is consistent with other types of sampling and monitoring requirements the Agency has placed in other permits. It is also similar to other testing EPA requires in some federal rules. The Agency also has the authority under Regulation I Article 3 Section 3.05(b) to require additional testing to demonstrate compliance with a standard at any time. Additionally, in order to ensure sulfur content does not change significantly over the 5 year period, The Agency has added an additional condition to the draft permit (Final Permit Condition 45) which will require the source to annually report sulfur content of the incoming LNG. This reporting can be used to determine if a significant change in sulfur has occurred which may warrant additional testing.

Proposed modification for Condition 21: An ongoing testing schedule is needed for compliance with the VOC minimum destruction efficiency of the flare, beyond initial startup testing.

Agency response to proposed modification for Condition 21: The destruction efficiency will be continuously monitored based on the temperature of the flare. If the flare is tested at a specific temperature and shown to meet the 99% destruction efficiency, then the tested temperature can be used as an indicator that it is meeting the standard. A requirement will be added to the final permit for repeat testing of the flare testing requirements in draft permit conditions 21, 22, 23, and 25 once every 5 years.

Proposed modification for Condition 25: An ongoing testing schedule is needed for compliance with the particulate matter standard, beyond initial startup testing.

Agency response to proposed modification for Condition 25: A repeat testing requirement of once every 5 years will be added to the permit for PM testing of the flare.

Proposed modification for Condition 27: Language should be added to clarify that performance tests of the enclosed ground flare need to *commence* within 60 days of the ground flare startup, but no later than 180 days from plant startup.

Agency response to proposed modification for Condition 27: This condition will be clarified that testing must be conducted within 180 days of the issuance of the Order of Approval.

Proposed modification for Condition 32: The Leak Detection and Repair Plan for fugitive emissions should be submitted to- *and approved*- by the Agency *prior* to facility startup, in order to ensure fugitive emissions are not left unchecked.

Agency response to proposed modification for Condition 32: The Agency respectfully disagrees with this comment. Typical Leak Detection and Repair plans that are required in many of the federal rules are not submitted for review and approval by any regulatory authority; however, the Agency did specifically require that this facility submit their prepared LDAR for review and approval. The Agency specifically lists all the requirements of the LDAR in the draft permit to ensure that the LDAR is developed correctly. The Agency's review will essentially consist of reviewing the plan for all the outlined requirements in draft permit condition 32. Implementing the plan immediately upon startup of the facility will ensure that fugitive VOC emissions are not left unchecked during the time the Agency reviews the plan. For more discussion on LDAR, see Response 4 in this appendix.

Proposed modification to Condition 40: To maintain consistency with page 8 of the worksheet, this condition needs to state, "…the sole source of natural gas supply to the facility is from British Columbia or Alberta Canada*, but entering Washington through British Columbia*." Further, how will the public be notified if this condition is not met and plant operations cease?

Agency response to proposed modification for Condition 40: The Agency believes draft condition 40(a) covers what the commenter is suggesting: LNG must enter from Canada to Washington. The Agency does not notify the public of noncompliance with permit conditions; however, the Agency regularly provides compliance data to the Environmental Protection Agency which is then posted on EPA's Enforcement and Compliance History Online (ECHO) website: https://echo.epa.gov/. Also, any member of the public may request such records from the Agency at any time.

Proposed modification to Condition 44: Records from Condition 40 need to be included in this section to ensure accountability and compliance with this very significant condition.

Agency response to proposed modification for Condition 44: Draft Condition 40 requires such records be kept for accountability and compliance. Adding additional recordkeeping requirements in draft Condition 44 would be redundant.

A comment expressed concern that certain terms within the Proposed Order of Approval were not specifically defined, for example "startup", "malfunction", "shutdown" and "flare stack combustion zone".

The following text was deleted from draft Condition 28:

> *"The flare operating temperature requirement does not apply to periods of start-ups, shutdowns and/or malfunctions provided that these events are not actively processing waste gases and do not last for more than 1-hour."*

The text in draft Condition 29(b) was also deleted since the text above in draft Condition 28 has now been deleted.

Flare stack combustion zone does not need to be defined, as it is a common term used to describe the area in the flare where gas is combusted (just after the tip of the flame).

If the term is used in reference to a corresponding federal rule, then the definition of the term in the rule shall apply. For the remaining areas where these terms are used, a specific definition is unnecessary since each event is case specific and requires subsequent Agency review.

3a) Suggested Permit Conditions.

The Agency received comments that suggested new requirements or processes for the facility beyond those in the Proposed Order of Approval. Below are responses to those comments.

Some comments expressed concern about particulate matter emissions and questioned the effects of different fuel usage in the maritime industry. Some comments also stated or suggested that proposed permit conditions be added or modified to mitigate particulate matter and other air pollutants.

Similar to other comments, these comments request mitigation; in this case for particulate matter emissions. The Agency respectfully disagrees with these comments. Particulate matter is one of the six pollutants identified by the Clean Air Act as criteria pollutants. The City of Tacoma's FEIS included criteria pollutants in its review, and the Agency's FSEIS completed a review of GHG emissions on a life-cycle basis. Neither document concluded that a specific, adverse environmental impact from the proposed project existed to support a mitigation request. Additionally, no timely appeal was filed regarding the adequacy of the FEIS. No additional mitigation will be added to the permit conditions in response to these comments. See also other responses in this appendix addressing SEPA-related comments.

The air emissions from the proposed LNG project operation are within the scope of review in the NOC application. The proposed order of approval for that NOC application was published because it met the regulatory requirements specified for approval. Those include the source meeting all applicable air quality regulations, that the proposed source will utilize BACT, and that the impacts of the air emissions from the proposal meet all of the specified emission impact thresholds (both for criteria pollutants and toxic air pollutants). The NOC program does allow for new emission units to be established if the appropriate criteria are met.

The FSEIS scope addressed only GHG emissions on a life-cycle basis, and did not review criteria pollutants. While the FEIS did evaluate criteria pollutants, it did not do so on a life-cycle basis. The life-cycle type of analysis for criteria pollutants is not reasonably needed because the impacts are defined on a localized basis and the ambient air quality standards for criteria pollutants must be met within each air shed where the emissions are released. Technically, a lifecycle analysis makes more sense for GHGs because of the global nature of the pollutant issue. That being said, there are criteria pollutant benefits (i.e. PM, SO_2, and NO_X reductions) that would be realized from a marine fuel switch from MGO to LNG. The fact that these emission reductions are achieved over the entire vessel journey (while using the alternative fuel) does not change the fact that local residents would receive some of the benefit for operations in and near the Port of Tacoma. These emission reductions are discussed in various references, including a technical article titled "*Particle- and Gaseous Emissions from an LNG Powered Ship*" by Anderson, Salo, and Fridell [*DOI: 10.1021/acs.est.5b02678, Environ. Sci. Technol. 2015, 49, 12568−12575*].

A comment referenced Table C.1 of the FSEIS and suggested that the Agency use permit language to regulate the carbon content of LNG.

This comment appears to take the carbon content information from the Final SEIS out of context and implies that the carbon content of these fuels compared in the analysis are variables that a permit could control. That is inaccurate. The statement extracted from the GHG life-cycle analysis report is accurate, and can be stated based solely on the chemistry of fuels. The carbon content of MGO may actually have more variability than natural gas, but based on other fuel property specifications, that variation for this analysis may be reduced (*see FSEIS, Appendix B, p. 116, Table C.2).* For natural gas, the primary component is methane, although there may be some other, lower concentrations of other light hydrocarbons in the pipeline gas. After the processing to produce a liquefied product (LNG), the portion of that stream is even closer to pure methane. Methane is represented by the formula CH_4, with a molecular weight (MW) of 16.

Carbon (C) has a MW of 12, and hydrogen (H) has a MW of 1, to produce the combined MW of 16 [(1x12)+(4x1) = 16]. So, each molecule of methane will be ~75% carbon by weight [(12/16) or ($C_{MW}/CH_{4\,MW}$). As long as natural gas is primarily composed on methane, this carbon content identified in the report will only change slightly based on trace levels of other compounds that are not removed in the LNG process. This is also illustrated by the minor differences between the natural gas and LNG carbon content (wt%) shown in Table C.1 (*see FSEIS, Appendix B, p. 115*). No additions to the permit conditions are needed based on this comment.

Some comments suggested additional requirements to be implemented into the Proposed Order of Approval as a way to mitigate potential impacts. Some examples of these suggestions: "Within one year of startup, PSE should be required to;

- **Catalog the sources of vented and flared methane locally and regionally.**
- **Develop an action plan for how they will capture all of these emissions.**
- **Develop a progressive work plan for how they will incorporate emerging technologies into their system so that within 10 years from startup, the Tacoma LNG facility and associated end-use applications will be run solely on local/regional sources of renewable, sustainable energy."**

The Agency respectfully disagrees with these comments. They appear to request mitigation for methane emissions from the project through a series of actions to be included in the NOC approval conditions. The SEPA regulation states "*Mitigation measures shall be related to specific, adverse environmental impacts clearly identified in an environmental document on the proposal and shall be stated in writing by the decision maker." [WAC 197-11-660(1)(b)]*. That condition does not exist in this situation because the FSEIS did not reach the conclusion that a specific, adverse environmental GHG impact is created by this proposal. So the basis for the suggested mitigation conditions is not supported by the analysis in the SEIS.

Another ambiguity in these comments is that they refer to unspecified sources of methane within the project vicinity and the region, but do not provide any information about specific sources. Then, with the proposed mitigation conditions recommended for addition to the permit, it identifies the first step to have PSE "Catalog the sources of vented and flared methane locally and regionally". Speculative methane sources are not sufficient upon which to base a reasonable or enforceable permit condition. Additionally, the last suggested condition appears to seek the revision and repurposing of the proposed LNG facility within 10-years of startup which is beyond the Agency's authority in reviewing PSE's application. Based on the above, the suggested conditions are not reasonable or necessary and will not be added to the order for this proposal.

Some comments describe "Power to X" and other emerging fuel technologies and suggest that they should be considered as part of this permitting process. One comment further suggests corresponding "interim mitigation measures" to be part of PSE's proposed permit for the LNG facility such as carbon capture and sequestration, biogas capture, and local reforestation.

These comments appear to suggest that the Agency should have considered emerging fuel technologies when evaluating PSE's private project proposal. The project that the Agency is reviewing is the proposal for the Tacoma LNG Project as submitted by the applicant PSE. The Agency is not evaluating on a non-project basis options for reducing GHG emissions from the marine transportation industry as a whole nor is the Agency readdressing the purpose and need for this project. We received comments similar to this during the SEIS review process and responded to them (see *FSEIS, Appendix C.2 – Response to Comments, Response Categories 6, 7, and 19).* Further, the Agency does not have the basis here to compel PSE, as a private project-specific applicant, to invest in new, separate projects as a condition of approval for its specific application.

The Agency also is not able to add to PSE's LNG plant operations or PSE's business model as part of its SEPA or NOC review as requested above. For example, *WAC 197-11-660(1)(b)* states "*Mitigation measures shall be related to specific, adverse environmental impacts clearly identified in an environmental document on the proposal and shall be stated in writing by the decision maker."* Using its SEPA authority, the Agency included draft Condition 40 (Final Condition 41) in the Order Of Approval. The Agency does not believe further conditions are reasonably needed or supported by the analysis before it. Moreover, SEPA does not require the Agency to consider a project proponent's business plan, including items like financing or expected profits, *see* WAC 197-11-448, and the Agency has not done so in its SEPA review for this proposal.

Some comments requested that emission data and other compliance information be posted publicly for the proposed LNG project.

The Agency does not notify the public of noncompliance with permit conditions; however, the Agency regularly provides compliance data to the Environmental Protection Agency which is then posted on EPA's Enforcement and Compliance History Online (ECHO) website: https://echo.epa.gov/. Also, any member of the public may request such records from the Agency at any time.

4) Emission estimates for non-GHG pollutants.

The comments and responses in this category relate to the emission estimates and emission factors used in the Proposed Order of Approval. The Agency received comments that questioned these emission factors, expressed concern or disapproval, or suggested other emission factors or calculation methods be used. These comments regarding emission factors and estimates are addressed below.

Some comments received expressed concern or disapproval with the emissions associated with the proposed LNG facility. Those comments are addressed in Response 2 of this appendix.

Some comments expressed concern that the emissions for the proposed facility were underestimated, and did not reflect the potential maximum capacity of the facility.

Emissions of all pollutants were calculated using the production rate presented in the NOC application and represent the maximum permitted PTE for each pollutant, and as mentioned in Response 3 above, a limit of 250,000 gallons of LNG per day was added to the permit to further limit the maximum capacity of the plant to operate. Emission factors and destruction efficiency used in preparing emission estimates will be verified with performance testing as required in draft Conditions 5, 7, 8, 9, 15, 16, 17, 18, 19, and 20. Please read Response 4 in this appendix in its entirety for more discussion on emission factors.

A comment suggested that the overall emissions were underestimated in the Proposed Order of Approval, and that, as a result, the facility may be a major source of emissions for Title V Permitting purposes as defined by the EPA.

The Agency respectfully disagrees with this comment. The major source threshold as defined by EPA for Volatile Organic Compounds (VOCs) is 100 tons per year in the Tacoma area, whereas the potential to emit for this project is 49 tons per year. This is not near or approaching the major source threshold. The potential to emit for other criteria pollutants are further below their respective major source thresholds than that of VOCs, and the facility is not a major source for any pollutant. See also Response 2 in this appendix.

A comment expressed concern or disapproval of the Agency's determination regarding the applicability of WAC 173-400-113. The comment also states that the source appears to only be meeting WAC 173-400-113 because of misleading emission factors and unsubstantiated assumptions regarding the flare's destruction efficiency.

The Agency agrees that WAC 173-400-113 applies to all facilities and the proposed NOC worksheet reflected this. As a result, the short term emission impacts were modeled with four different scenarios and using the highest emission rates from each operating scenario to yield the highest estimated concentration. The proposed facility has shown that it will meet all requirements of WAC 173-400-113. Performance testing has also been placed into the permit to verify compliance with BACT limits and the emission factors used to conduct modeling for PM, VOCs and other pollutants. [See draft Permit Conditions 5, 7, 8, 9, 15, 16, 17, 18, 19, and 20.] Please read Response 4 in this appendix for more discussion on emission factors.

Some comments expressed concern or disapproval with the meteorological data used in the emission modeling scenarios.

When sources are required to conduct modeling as part of an NOC application, the Agency does not require on-site meteorological data as part of the analysis conducted in the NOC process. Meteorological data used for modeling is comprised of the best information available to the Agency at the time of the permit review and sometimes requires additional analysis of all available information to ensure the most representative data for the facility is used. In the case of this application, modeling was conducted using the available data (wind speed and direction) from the Tideflats monitoring station since it represented the most accurate wind data for the area. Other data, including relative humidity, temperature and all other required parameters, were taken from four other representative monitoring stations: Tacoma South L Street, McChord

Airforce Base, and SeaTac Airport. These different stations provided the Agency with four different modeling scenarios to allow the use of the most conservative scenario to determine impacts. Please see the worksheet for additional discussion on the choice of meteorological data and the modeling results.

Some comments expressed concern or disapproval with the Agency's use of certain emission factors in the NOC analysis, including AP-42 emission factors which are average emission factors and sometimes have rating factors that are low. Some comments expressed concern regarding potential emissions of specific pollutants such as Particulate Matter (PM), PM 10, PM 2.5, and specific pollutants known as Hazardous Air Pollutants (HAPs).

The Agency respectfully disagrees with these comments. AP-42 is an acceptable source of emission factors for estimating potential to emit for preconstruction permitting purposes and it is standard engineering practice to use this data for this purpose by itself or in conjunction with other data. These factors are commonly used for this purpose across the country. The Agency used AP-42 factors as well as other emission factors where additional sources of information were available. AP-42 factors represent the average of all the qualified field test data that EPA had at their disposal when developing the factors. Generally field tests are performed at maximum short-term capacity which would result in short-term maximum emissions for that particular source and that particular test. Different sources vary in what their maximum emissions will be, so using an average value of all test data adequately represents the potential emissions when combined with the maximum hours of operations for the source. Lower rated emission factors represent areas where a smaller amount of test data was available to EPA. This does not necessarily mean the values would underrepresent the emissions, it solely means it was based on a smaller set of data. In regard to emission calculations of PM/PM10/PM2.5 from the enclosed ground flare, the calculation shows they are well below any regulatory threshold, and as a result, no performance testing will be required to get a more accurate emission characterization. HAP emissions from both the boiler and flare are also significantly lower than any regulatory thresholds and also did not require additional testing to verify. The vaporizer is limited to 240 hours per year of operation, which will further limits the total emissions of PM/PM10/PM2.5 and HAPs (see condition 4).

Some comments expressed concern or disapproval with the Agency's emission calculations for the proposed ground flare. A comment indicated that the flare gas composition inputs do not account for variability between flared waste gas cases.

The Agency agrees with the comment that during actual operations for each of the proposed flare waste gas cases, the gas composition for the HAPs could also vary between each case as it does for sulfur and VOC content (Liquefying Case 1, Liquefying Case 2, etc.). In order to calculate and estimate worst case emissions, the highest concentration levels were taken from among all of the flare waste gas cases and applied to all the other flare waste gas cases even though the other cases may actually be lower.

A comment expressed concern about the flare destruction efficiency assumption used in Proposed Order of Approval Condition 15, specifically regarding the phrase "compounds

up to 3 carbons" for Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). This comment expressed further concern that the flare destruction efficiency of 99% for VOCs and HAPs is too high and/or unsupported and that the 10 ppm outlet limit concentration alternative was not specifically used to calculate all emissions of VOCs and HAPs.

The Agency agrees with the comment that the flare emission calculations were assumed to all have 99% destruction efficiency for all VOCs and HAPs/TAPs and that emissions were not calculated at 10 ppm for all VOCs and HAPs and has therefore changed draft condition 15 to include all VOCs, not just those up to 3 carbons, and removed the alternative 10 ppm limit. Additionally, draft permit condition 21 requires performance testing to verify the destruction efficiency for all VOCs. In regards to the comments that expressed concern that the Proposed Order Of Approval does not require direct and continuous testing at the inlet and the outlet to determine the control efficiency, the Agency has placed a performance testing requirement in the permit which would require sampling at the inlet and outlet to determine the destruction efficiency. After performance testing, temperature can be used as a monitoring parameter to show that the control efficiency is occurring if the flare maintains the same temperature that showed compliance with the permit limit during performance testing.

Some comments expressed concern regarding or disapproval of the emission factors used by the Agency to estimate flare emissions including Nitrogen Oxides (NOx), Particulate Matter (PM2.5), Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs). There was also concern that the first tier review for TAPs was not properly performed.

Regarding NOx emissions, the flare manufacturer provided emission estimates for the flare. It is not unusual for the manufacturer of pollution emitting or pollution control equipment to provide their emission estimates for their equipment to permitting agencies. Generally this is based on the manufacturer's knowledge of the equipment and how they expect it to function for the given application. This information is generally more accurate and more specific than AP-42 or other general emission factors. For this case, the Agency does not expect there to be meaningful amounts of fuel bound nitrogen going to the flare from any of the waste gas scenarios, and the amount of thermal NOx formation will be verified as part of performance testing. Additionally, the Agency has required PSE to conduct a performance test on the flare for NOx (see condition 17) which will require them to meet the following NOx limits which will verify the emission estimates:

- -0.066 lbs/MMBtu whenever the small warm burner (Burner 3) is operating
- -0.060 lbs/MMBtu whenever the small cold burner (Burner 2) is operating, and
- -0.023 lbs/MMBtu whenever exclusively one or both of the large burners (Large Warm Burner 1 and Large Cold Burner 4) are operating.

The commenter also asserts that significant quantities of N_2O will be produced from flare gas combustion. Although the NOC application did not directly calculate N_2O emissions from the combustion of flare gas, the Agency did calculate on-site N_2O emissions as part of the SEIS analysis.

Please see Response 4 in this appendix for more information on the use of AP-42 emission factors.

Regarding the HAPs and TAPs emission calculations concern, the Agency respectfully disagrees with the concern in this comment. As discussed in the draft worksheet starting on page 34, the Agency conducted a robust search to find the most accurate and representative emission factors even when AP-42 did not list the chemicals. Information was taken from EPA's AP-42 database, WebFIRE online database (updated on 09/07/2016), California's Air Toxic Emission Factors online database (CATEF, updated in 1996), AB2588 Combustion Emissions Factors inventory (updated in 2001) and San Diego's Air Pollution Control District (SDAPCD) emissions inventory tables (updated in 2005). In some cases when multiple values were available, the maximum value was used by the Agency, resulting in the highest emissions and highest modeled ambient concentration where modeling was performed. Regarding the first tier review of TAPs, the calculated values of all TAPs were compared to the small quantity emission rates (SQERs) found in the state air toxics rule at WAC 173-460-150. Per the regulation, only the TAPs that were at or above the SQER were modeled. If the emissions were not above the SQER, modeling was not required and was not performed.

Some comments stated that the facility's estimated fugitive emissions were underestimated in the Proposed Order of Approval due to the control efficiency assumptions of the LDAR as well as the emission factors used for leaking components. Some comments expressed concern or disapproval of the Agency's assessment of the proposed facility's Leak Detection and Repair (LDAR) system, as well as concern regarding the process for monitoring fugitive emissions during operation.

The Agency respectfully disagrees with these comments. In regards to emission factors and control efficiencies used to calculate emissions from facility leaks, the referenced South Coast's terminal/depot guidance document which was used to calculate fugitive leak emissions does not contain control efficiency estimates when implementing a leak detection and repair program. EPA has a guidance document for estimating leak emission rates (EPA's protocol for Equipment Leak Emission Estimates EPA 1995b). In the EPA's guidance document, they estimate that implementation of the hazardous organic NESHAP would control emissions by 88 percent for light liquid service and 92 percent for gas service for the uncontrolled emission factors in the EPA's 1995 protocol. In order to maintain worst case scenario emission estimates, the Agency did not use the higher control efficiencies as found in the EPA guidance document; instead, Texas Commission on Environmental Quality's (TCEQs) lower control efficiencies were used - 75% for valves, pumps, compressors, and relief valves and 30% for flanges.

In regards to the number of components estimated by the applicant and used in the emission calculations, these will be monitored as part of the LDAR. If an increase in component parts occurs over time, it could require a permit application to address any emission increase not accounted for in this permit action. For more discussion on LDAR, please see Response 3 in this appendix.

Some comments expressed concern about benzene, and a comment expressed specific concern regarding impact levels of benzene and questioned why the estimated benzene

emissions changed from the applicant's previous permit application submitted to the Agency in 2017.

The original permit application which showed emissions of 56 lbs of benzene erroneously calculated emissions without the use of the control efficiency of the flare. The original calculated benzene emission factor was 1.7×10^{-4} lbs per MMbtu. When applying the 99% control efficiency from the flare, this becomes 1.7×10^{-7} lbs per MMbtu, which is what was used in the updated emission profile showing 0.66 lbs. of benzene per year. Due to the updated use of the control efficiency, the estimated emissions of Benzene were below the small quantity emission rates found in WAC 173-460-150 and no further analysis was conducted. For more detail on when modeling is required, please see Response 2 in this appendix.

Some comments expressed concern or disapproval that the Proposed Order of Approval did not consider or analyze facility emissions from accidental and/or uncontrolled events, such as fire, explosion, or other accidental releases.

The NOC review of the application does not include catastrophic events such as accidental releases or fire/explosions from the facility. These events are not part of a facility's routine operations and are therefore not a permitted activity where emissions would be calculated. Accidental releases and catastrophic failures are covered under different programs and handled by other agencies, and these authorities and programs are not delegated to the Agency. The agencies responsible for regulating these types of events can be found in the Final EIS issued by the City of Tacoma.

A comment asked about chemical holding and storage tanks and potential emissions from those tanks on the project site. Part of the comment referred to a chemical known as "MRL".

The NOC application for this facility did not include a tank containing a proprietary chemical called MRL. The tanks associated with the operation were identified in the draft worksheet in Section A:

- Propane Storage Vessel: 1,000 gallons
- Iso-Pentane Storage Vessel: 1,000 gallons
- Ethylene Storage Vessel: 2,760 gallons
- Heavies Storage Vessel: 4,650 gallons.
- LNG storage Tank: 8 million gallons

The emissions from these tanks are considered exempt under PSCAA rules and Regulation 1 Section 6.03(c)(78)(D) "Organic liquids (other than gasoline or asphalt) that also have a rated capacity <20,000 gallons" and (A) "Liquefied gases, including any tanks designed to operate in excess of 29.7 psia without emissions" and were not calculated as part of the permitting. Tanks are not typically vented except for safety or maintenance activities. Material vented from these tanks would be routed to the flare and destroyed before going to the atmosphere. As discussed earlier in this response, accidental and unplanned releases such as fires are not covered as a

permitted activity, nor are the risks associated with failures and ruptures of these tanks covered under air permitting. However, leaks associated with such equipment like valves were calculated as part of the draft worksheet and can be found on the emission calculation sheet "Attachment A PSE LNG Emissions revised" in tab "fugitives".

A comment questioned whether the LNG storage tank would be considered an emission unit. The comment additionally questioned the pressure of the LNG in the tank and the applicability of 40 CFR 60, Subpart Kb.

The draft permit contains a requirement that the LNG storage tank is cooled to at least negative 260 degrees Fahrenheit.

With respect to being an emission unit, the LNG storage tank is exempt under Agency Regulations in Regulation 1 Section 6.03(c)(78)(A) since LNG is a liquefied gas.

With respect to being an affected facility under 40 CFR 60 Subpart Kb applicability, liquefied natural gas is comprised of more than 90% methane. Methane is not considered a "volatile organic liquid" as defined in the subpart and is therefore not subject to this NSPS. For the residual components of natural gas that are considered volatile organic liquids, the rule would only apply if the vapor pressure of the stored liquid exceeds 3.5 kPa when stored at negative 260 degrees F, which is the threshold for tanks larger than 151 m^3 in volume. The vapor pressure is a physical property of the stored liquid and is below 3.5 kPa at negative 260 degrees F. (for example, propane when stored at such a low temperature is almost zero: https://webbook.nist.gov/cgi/cbook.cgi?ID=C74986&Mask=4&Type=ANTOINE&Plot=on)

Some comments expressed concern or disapproval about Canadian gas composition, and questioned the possibility of chemicals and/or metals associated with hydraulic fracturing being present in the gas as it is processed at the proposed LNG facility. Additionally, a comment was concerned that EPA emission factors or other emission factors may not be relevant to Canadian gas.

This comment regarding source of natural gas and emission data used by the Agency appears to be mixing different information about the composition of natural gas and the use of emission factors provided by EPA to support the evaluation of combustion emissions. The natural gas composition provided by the applicant reflected samples collected from the Williams Northwest Pipeline, which is sourced from Canada through B.C. This gas composition included trace compound analysis that included volatile organic compounds, sulfur compounds, other major gases (excluding hydrocarbons) and mercury. That gas composition was used in the permit application review to reflect emissions and impacts driven by either material balance calculations or control efficiencies that are applied to material balance calculations. The emission factor data from EPA's emission factor references (e.g. AP-42) was used to supplement the emission data for combustion emission units as a reasonable assumption. Those published factors included metal emissions that are unexplained for natural gas combustion, yet were included anyway. Natural gas transmission does not lead to clear pathways of metals content in the gas as most metals do not exist in a gaseous form. The gas analysis provided by PSE included mercury as an

analytical parameter, as it is a metal that exists in a semi-volatile state. None was detected in the gas samples collected. This data and emission factor information is consistent with the professional engineering judgment that the Agency regularly uses for NOC application reviews. For discussion on chemicals related to hydraulic fracturing, see response below. For more information on Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs), please see Response 2 in this appendix.

Related to the comment above regarding Canadian gas, an additional comment expressed concern that Williams Gas Pipeline data was not relevant to Canadian gas. The comment also stated that the methane content of Canadian gas was lower than that of gas from other sources, and expressed concern that radioactive materials may be present, along with other toxic byproducts.

The comment regarding the composition of Canadian natural gas having less methane than other natural gas sources was not supported by any reference and also is inconsistent with the methane and hydrocarbon content of the gas reported by PSE in comparison to normal natural gas contents. Additionally, with the methane content comment unsupported, it also does not support the supposition that it leads to more toxic byproducts in the natural gas supplied. The assumption that materials used to support natural gas fracking production techniques are collected and sent into the pipeline for distribution is not supported by any data submitted. As with metals, the chemicals that are used for natural gas production are reportedly an issue with contamination near the well site but are not routinely volatilized and transported through the pipeline. Natural gas is processed through several intermediate treatment units before it is ready for transport. The detailed analysis of samples of the Williams Pipeline natural gas reflected volatile or gaseous related materials that were present at trace concentration levels (or below detection limits). Additionally, the Agency has no information regarding any radioactive materials in the supplied gas and the commenter does not provide any references to support the idea. See Response 2 in this appendix for more discussion on Toxic Air Pollutants (TAPs), and Response 3(a) for discussion on carbon content.

A comment asked about emissions from various processes, including pumping, processing, storing, transferring, venting, flaring, shipping, barging, trucking, and burning.

All material transfer points such as pumping, processing, storage, transferring, and venting are potential sources of emissions while transporting liquid or gas. Leaks associated with such equipment like valves were calculated as part of the draft worksheet and can be found on the emission calculation sheet “Attachment A PSE LNG Emissions revised” in tab “fugitives”. Flaring was evaluated as part of the draft worksheet for potential emission releases. Shipping, barging, and trucking would all have the potential for emission leaks but are not part of the stationary source once transferred to the mobile source. As such, the emissions from mobile sources such as ships and trucks were not evaluated as part of this application.

Some comments asked if “proprietary chemicals” would be emitted from the facility. Other similar comments provided lists of chemicals, some related to hydraulic fracturing, and asked which were expected to be present at or emitted by the facility.

It is unclear what is meant by "proprietary chemicals" in these comments. All potential air pollutants to be emitted by the facility were evaluated in the worksheet and are shown in the emission calculation spreadsheet as an attachment. As required under Regulation I Article 5 Section 5.05(b), the facility will be required to monitor and annually report air contaminants emitted above their respective regulatory thresholds to the Agency for review. In regards to the public knowing if they are safe amounts; all pollutants were below regulatory thresholds found in WAC 173-400-150. All of the emissions analyzed in the worksheet are from the facility as a stationary source and do not include emissions associated with mobile sources such as ships or trucks.

5) SEPA Documents – Air Related.

The comments and responses in this category relate to elements of the Final EIS issued by the City of Tacoma in 2015, and the Final SEIS issued by the Agency in March 2019. This category is focused on comments and/or elements of these documents that were related to air or air impacts.

The Agency received comments that stated or suggested that the descriptions or scope of the proposed project have changed significantly since the FEIS was issued by the City of Tacoma in 2015, and that additional review is necessary.

Some comments questioned the air emission amounts and descriptions from the 2015 Final EIS issued by the City of Tacoma. Other comments questioned why the emission amounts changed from the 2015 EIS to the NOC application. A comment specifically questioned the VOCs in the 2015 EIS.

The Agency believed it had a sufficiently defined proposal when it conducted its NOC review, and the associated SEPA review, for PSE's application. For the purpose of reviewing PSE's NOC application, the Agency did determine that some specific additional review was necessary and issued a Supplemental EIS to conduct a lifecycle analysis of greenhouse gasses. This review was completed March 29, 2019. As stated below, no "new" information has been presented to the Agency that would meet the SEPA standard for additional review as it relates to the NOC application.

The emissions changes from the 2015 Final EIS to the draft NOC are due to a number of adjustments, such as updated emission factors, adjustments in calculation methodology, exemptions from our permitting program, and refinements in some of the original calculation equations. Changes were outlined in the SEPA section of the NOC Engineering Review Worksheet (Section D) along with the associated reference to the EIS. The flare and the LDAR are used to control air emission releases of all VOCs and TAPs.

The emissions of the proposed project were thoroughly reviewed during the NOC review process, including specific information from the permit application. Volatile organic compounds (VOCs) are defined as any compound of carbon, excluding carbon monoxide, carbon dioxide,

carbonic acid, metallic carbides or carbonates and ammonium carbonate, which participates in atmospheric photochemical reactions, except those designated by EPA as having negligible photochemical reactivity. The total amount of VOCs quantified for this project were shown in the associated calculation sheet. Each of the VOCs emitted that were either toxic air pollutants (TAPs) or Hazardous air pollutants (HAPs) were calculated specifically for the purposes of the Toxics rule and compared to the short term emission rates.

Please also see Responses 1 and 2 in this appendix.

Some comments questioned the types of fuel bunkering associated with the proposal. Some comments were based on language in the SEIS and the NOC Engineering Review Worksheet and questioned which types of vessels would be directly fueled with LNG at the site.

Some comments regarding the assumptions used in the SEIS analysis indicate that some clarification on the nomenclature that is in the NOC Engineering Review Worksheet may be helpful. The scenario described in the SEIS is accurate and valid for the project. Additional GHG analysis is not necessary because the emissions from the described bunkering operations are valid and account for the emissions related to that operational function.

The LNG that will be transferred across the marine dock at the proposed plant will either fill the LNG fuel tank on a Tote Marine vessel or be used to fill a bunker vessel that would transfer the LNG into the fuel tank of another LNG fueled vessel in the Puget Sound operational area. The NOC Engineering Review Worksheet statement *"[t]he Tacoma LNG Project will only be fueling vessels, not filling tank ships or tank barges that transport bulk LNG"* is referring to vessels that would be transporting bulk LNG for transfer to other, non-specific users. This is the type of activity that would be associated with an export terminal, which this facility is not. Another way to describe this operation would be to look at a tractor-trailer vehicle that transports diesel fuel to retail fueling stations. The diesel in the large tanks on the fuel truck that deliver fuel to the station is considered the "bulk load" or the "bulk diesel" for delivery. The diesel tank on the truck that powers the engine that drives the fuel for a fuel delivery is not considered "bulk" for this scenario. So, if a smaller fuel truck (e.g. like a home heating oil delivery truck) were delivering diesel fuel to fill the operating tank for the truck engine, that would be similar to the bunker vessel described in the FSEIS and the NOC Engineering Review Worksheet. The Agency has updated the worksheet to make this distinction more clear.

Some comments suggest or state that the FEIS and the SEIS do not reflect future requirements and planning scenarios; and that this Agency should do additional review to address the purpose and need for this project.

The Agency received comments similar to this during the SEIS review process and responded to them in that record (see *FSEIS, Appendix C.2 – Response to Comments, Response Categories 6, 7, and 19).* None of the identified "new" information meets the standards in SEPA for additional supplemental review and the analysis to date provides a reasonable discussion of air related impacts from PSE's proposal.

Some comments suggested or stated that, due to various reasons including the passage of SB 5116 in Washington State, the proposed project would only be used to provide fuel to marine and trucking customers. These comments expressed concern that, as a result of SB 5116 and/or other possible scenarios effecting the energy market, that the proposed facility would keep the shipping and transportation industries reliant on fossil fuels for a certain amount of time. These comments also expressed concern that this would necessitate a Supplemental EIS.

The Agency respectfully disagrees with these comments regarding the project changing to be solely for marine and trucking customers. Response 7 in this appendix and discussion within this response address the impacts of a 10-year peak shaving use versus a 40-year assumption. If the peak shaving need or use were reduced and that portion of LNG production were available for more marine and trucking fuel substitution, the GHG reduction potential would improve because it would increase the amount of liquid fuel (e.g. MGO and diesel) substitution. Peak shaving does not provide that GHG benefit because it would be replacing directly supplied natural gas to customers with a natural gas that has had additional processing (the LNG plant).

The Agency also disagrees with the characterization that the proposed LNG plant "*would keep the shipping and transportation industry reliant on fossil fuels for at least the next 40 years*". This is a speculative conclusion and outside the scope of the Agency's review of PSE's specific application before the Agency. Comments received on the DSEIS suggested that we could not complete the GHG life-cycle analysis because the future customers for LNG use had not all been identified. We disagreed with those comments in the SEIS too; this information is speculative and not necessary for the completion of our review on this application or for purposes of SEPA review (see *FSEIS, Appendix C.2 – Response to Comments, Response Category 19).*These comments do not represent new information or a substantial change to the project that the Agency would agree leads to the need for new environmental review.

Some comments suggest that the recent legislation adopted (SB-5116) will lead to a decrease in natural gas demand and that is an additional reason to do additional environmental review of the project.

These comments appear to relate to some confusion about the use of LNG for peak shaving for power generation that was included in the DSEIS. Comments on that document led to a clarification and revision of the final analysis to be clear that LNG was not for use as an electrical generation fuel (see *FSEIS, Appendix C.2 – Response to Comments, p. 20, discussion of "Peak Shaving").* The provisions of SB-5116 apply to the carbon profile of electrical energy supplied to Washington State. While the carbon profile of electrical energy was discussed in the GHG Life Cycle Analysis, no credit was taken for emission reductions that were speculative at the time of the analysis. The utility mix assumptions and the effect on the GHG life-cycle analysis were discussed in the final report and highlighted in the sensitivity analysis in the FSEIS *(see FSEIS, Appendix B, p. 66).* If the Tacoma Power mix was the only power mix used, the calculated GHG reductions identified in the report might have been higher. A cleaner electrical power supply for the site will only lead to greater GHG reductions in the analysis and would not be the basis for reasonably needed additional environmental review of greenhouse gases for purposes of SEPA to inform the NOC application review.

Some comments continue to link the LNG plant and the peak shaving aspect of it to PSE's operation of electrical generation resources.

This is addressed above and was also addressed in the response to comments in the FSEIS (see *FSEIS, Appendix C.2 – Response to Comments, p. 20, discussion of "Peak Shaving").*

Some comments suggested or stated that PSE has reduced the end-use of LNG for peak shaving. Some comments further stated that a new environmental review was necessary for this reason.

During preparation of the DSEIS, the 10-year assumption was initially used in the analysis based on technical information provided by PSE for use in the GHG life-cycle analysis Comments were received regarding the assumptions of a 10-year peak shaving demand versus a longer period of time for the project. This was addressed in the FSEIS (see *FSEIS, Appendix C.2 – Response to Comments, p. 20, discussion of "Peak Shaving").* A 40-year peak shaving assumption was added to the analysis and included in the sensitivity analysis in the FSEIS *(see FSEIS, Appendix B, p. 66).* The value for peak shaving used in Table 2.6 of the FSEIS relates to the same topic (10-year use versus 40-year use) and the calculation assumption about this was shown and identified, as identified by the comment(s). The sensitivity analysis added the 40-year assumption in the FSEIS in response to this comment. The actual usage of LNG for peak shaving demands could be less than projected levels based on a number of factors. However, the maximum identified uses of the LNG produced were consistent with the methodology used by the Agency to evaluate the GHG life-cycle emissions of the proposal and additional analysis is not needed for the purposes of the NOC application review and would not be the basis for reasonably needed additional environmental review for purposes of SEPA. Thus, the impact of the length of LNG peak shaving service on the GHG life-cycle analysis has been considered and additional analysis is not necessary for purposes of NOC or SEPA review.

6) Construction Status.

Some comments were received that requested more information on the Agency's enforcement process with PSE, or expressed disapproval of this process. Below is a description of the Agency's enforcement process to date, which has been consistent with other similar enforcement actions.

Beginning in 2014, the Agency and PSE had discussions regarding the upcoming project in anticipation of an NOC application submittal. These efforts also included tracking the SEPA review process on the project in anticipation of that eventual NOC application. The Agency received asbestos project notifications in late 2016 for work on the site planned through the spring of 2017. Agency staff visited the site to evaluate compliance with our asbestos regulations. While there, the Agency made further inquiries about the project activities.

After reviewing the information found onsite and additional materials PSE provided in response to our inspectors' request, on April 12, 2017, the Agency issued a Notice of Violation (NOV)

for Regulation I, Section 6.03 (i.e. failure to obtain a Notice of Construction approval prior to construction, installation, establishment or modification of a source). The NOV identified two Corrective Action Orders: (1) Respond within 10 days to identify corrective actions taken to achieve compliance; and (2) Within 30 days, submit a complete NOC application with appropriate fees.

PSE responded in a letter contending that they have not violated the Agency's NOC requirement, identifying why they hold that view, and requesting that the Agency withdraw the NOV. They also indicated that even though they disagree with the NOV, they would proceed to submit the NOC application by the date identified in the corrective action order. On May 9, 2017 PSE requested an extension on the application submittal date to allow for the application to be sent in two submittals (May 22, 2017 and June 22, 2017). The Agency granted that extension for the application submittals.

The actions described above summarize our work to date and are consistent with our regulations and normal enforcement practices. With respect to the comments received, we provide the following:

- The Agency investigated the activities onsite and issued an NOV to PSE with a corrective action order.

- The NOV the Agency issued was to PSE because they are the owner of the project and will be the operator of the air emission equipment, if approved. The requirement to comply with our regulations is their responsibility and there is nothing in the information we have that would indicate otherwise.

- The NOV was the first step in the enforcement process and the goal of any Agency enforcement effort is for a source, either planned or operating, to reach compliance with our air quality regulations. Regulation I, Section 3.09(a) states that an NOV "*may include an order directing that necessary corrective action be taken within a reasonable time.*" The requirements in the corrective action order in the NOV issued to PSE were intended to clearly identify what was needed to address the issue. As a result, NOC application materials were submitted by PSE, were determined complete by the Agency and subsequently reviewed by the Agency, including some additional work by the Agency to supplement the information received from PSE. A Draft NOC Order of Approval was released in July 2019 and comments on the draft have been reviewed by the Agency.

- The circumstances of this case have not supported pursuit of an order by the Agency to stop construction. If PSE had already built something that was clearly not approvable through an air permit, that would be a factor the Agency would consider. If PSE were operating a source without a required air permit approval and were showing no intention to remedy that noncompliant situation, that would also be a factor the Agency would consider. Throughout this process, our enforcement case has focused on correcting the noncompliance cited and PSE has worked to resolve the issue. We continue to monitor PSE's progress on the case and when the noncompliance is resolved, the Agency will complete its formal enforcement process through consideration of any civil penalties which may be recommended, as identified in Regulation I, Section 3.11 – Civil Penalties. Any work done by PSE was at their own risk. The review of the NOC application may have led to recommendations of

proposed permit conditions which could have necessitated design/site revisions.

7) FSEIS Factors, Methods, and Conclusions.

The comments and responses in this category relate to the factors, methods, and conclusions of the SEIS issued by the Agency in March 2019.

Some comments stated or suggested that the Draft Order of Approval was flawed or should not have been issued because the factors, methods, and/or conclusions of the Final SEIS were flawed, inaccurate, or did not adequately respond to comments on the Draft SEIS.

The Agency respectfully disagrees that the Final SEIS issued on March 29, 2019 did not adequately respond to comments submitted to the Agency on the Draft SEIS. The comments received during the public involvement process for review of the Draft SEIS were carefully considered and addressed in the Final SEIS, which included technical updates to the final analysis (see Final SEIS document, including *Appendix B – PSE Tacoma LNG Project GHG Analysis Final Report*) and the responses to the comments received (see FSEIS Document, *Appendix C – Draft SEIS Comments and Responses*).

The Agency also respectfully disagrees with the general characterization that the SEIS GHG analysis was flawed or inaccurate. The reference cited by a comment ("*The New Gas Boom*") was published after the FSEIS was published, but does not provide significant new information that changes the analysis and conclusions provided in the FSEIS because, for example, the article is focused on LNG as an export commodity. Some comments suggest or state that most gas consumed in North America is produced by fracking techniques. That appears to be accurate, regardless of whether or not the Tacoma LNG Project is completed and operating. The cited report also identifies that a large part of the natural gas industry efforts are currently focused on LNG export markets. The Tacoma LNG Project is not an export terminal (see *FSEIS, Appendix C.2 – Response to Comments, Response Category 6, pp. 5-6).* The cited reference ("*The New Gas Boom*") executive summary also stated that "*Due to falling costs of renewable alternatives, the expansion of LNG infrastructure faces questions of long-term financial viability and stranded asset risk."* That observation illustrates there are many factors which affect the demand and use of natural gas, most of these factors are beyond the scope of this review of PSE's NOC application.

The Agency understands that research and information regarding methane emissions associated with natural gas production and use is continuing to be developed and published. As an example, a paper titled "*Long-Term Measurements Show Little Evidence for Large Increases in Total U.S. Methane Emissions Over the Past Decade*" was published in May 2019 representing research completed by the University of Colorado, National Oceanic & Atmospheric Administration, and Lawrence Berkeley National Laboratory [see Lan, X., Tans, P., Sweeney, C., Andrews, A., Dlugokencky, E., Schwietzke, S., et al. (2019). *Geophysical Research Letters, 46*, 4991–4999. https://doi.org/10.1029/2018GL081731]. The paper

summary made the following points:

> "*In the past decade, natural gas production in the United States has increased by ~46%. Methane emissions associated with oil and natural gas productions have raised concerns since methane is a potent greenhouse gas with the second largest influence on global warming. Recent studies show conflicting results regarding whether methane emissions from oil and gas operations have been increased in the United States. Based on long-term and well-calibrated measurements, we find that (i) there is no large increase of total methane emissions in the United States in the past decade; (ii) there is a modest increase in oil and gas methane emissions, but this increase is much lower than some previous studies suggest; and (iii) the assumption of a time-constant relationship between methane and ethane emissions has resulted in major overestimation of an oil and gas emissions trend in some previous studies.*"

The research and position papers published since the FSEIS was released that the Agency is aware of have not changed the work and conclusions reached previously.

The Agency is also aware of ongoing work by the International Maritime Organization to develop background information for possible GHG reductions in the shipping industry. That information will be important when the IMO reaches a conclusion and agreement on GHG emission requirements for the industry. It is not relevant to the review of the NOC application before this Agency at this time.

Some comments questioned the preference for gas from British Columbia stated in the SEIS and/or expressed concern or disapproval of the proposed permit condition related to the source of gas. Some of these comments also expressed concern about the methane leakage rates used in the SEIS.

The Agency received comments on the assumed natural gas leakage rate for Canadian gas and responded to these comments in the FSEIS (see *FSEIS, Appendix C.2 – Response to Comments, Response Categories 11, 12, and 14*). Additionally, the range of upstream natural gas leakage rates were also evaluated for the effect on the GHG life-cycle analysis, were discussed in the final report (*see FSEIS, Appendix B – PSE Tacoma LNG Project GHG Analysis Final Report, pp. 95-102*), and were highlighted in the sensitivity analysis in the FSEIS *(see FSEIS, Appendix B, p. 66).* Some of the discussion on this topic in the FSEIS included information about the expanding regulations in Canada to address methane leakage emissions. Since the FSEIS was published, additional news with respect to the USEPA response to this issue was published on August 29, 2019 (see *"EPA Aims To Roll Back Limits On Methane Emissions From Oil And Gas Industry", NPR News at https://www.npr.org/2019/08/29/755394353/epa-aims-to-roll-back-limits-on-methane-emissions-from-oil-and-gas-industry*). This further contrasts the two nations' approaches to natural gas production in North America.

The Agency also disagrees with comments that the proposed permit condition regarding the source of the natural gas for the project is not "*legal and enforceable*" and has previously

responded to it (see *FSEIS, Appendix C.2 – Response to Comments, Response Category 13*). PSE also has voluntarily agreed to the inclusion of this condition for its application. Some comments also suggest that PSE could use natural gas from sources other than Canada to replace this fuel. This is not an accurate statement regarding the application at issue and the permit conditions identified for this topic. There are no other PSE projects using natural gas that have been proposed or are before the Agency for review.

The Agency believes that draft Condition 40 (Final Condition 41) is reasonable and appropriate as written.

Some commenters expressed concern that the GHG lifecycle analysis made a faulty assumption that LNG would replace marine diesel at a one-to-one ratio. Commenters further stated that the no-action alternative should consider new or future technologies, such as electric, hydrogen, ammonia, or biofuel-powered ships.

The Agency disagrees with the characterization that the No Action Alternative assumption of continued MGO use in the absence of LNG availability is faulty. Comments regarding the baseline assumptions were addressed previously (see *FSEIS, Appendix C.2 – Response to Comments, Response Category 8)* and the characterization of marine fuel as "dirty" ignores the other pathways for compliance in the marine transportation sector that were included in the FSEIS (see *FSEIS, Appendix C.2 – Response to Comments, Response Category 6).* The comment(s) also suggest that the baseline considered by the Agency should be based on future or theoretical targets; the Agency disagrees that it is reasonable for this SEPA review to consider future or theoretical targets as a baseline for environmental review.

Some comments also suggest that the Agency should have considered "*real world*" options in future scenario analysis, but then identify technologies that are presently emerging. The project that the Agency is reviewing is PSE's proposal; the Agency is not evaluating options for reducing GHG emissions in the future from the marine transportation industry. The Agency also is not readdressing the purpose and need for PSE's project. We have received comments similar to this during the SEIS review process and responded to them in that record (see *FSEIS, Appendix C.2 – Response to Comments, Response Categories 6, 7, and 19).* For more discussion on suggested alternatives to the project, please see Response 10 in this appendix.

Some comments questioned or expressed disapproval of the use of specific Global Warming Potential (GWP) metrics, as defined by the International Panel on Climate Change (IPCC), such as the 100 year timeline, or AR4 assessment, in the GHG lifecycle analysis as part of the SEIS. Some comments suggested using different metrics.

The Agency received similar comments regarding Global Warming Potential or GWP values and evaluation timeline on the DSEIS and addressed them in the final document (see *FSEIS, Appendix C.2 – Response to Comments, Response Categories 9 and 12).* The Agency provided additional analysis to evaluate the effects of different GWPs (e.g. AR4 vs. AR5) and summarized that information in the sensitivity analysis in the FSEIS *(see FSEIS, Appendix B, p. 66).* The SEIS response to the comments on the 100-year timeline for the evaluation remains valid today and remains consistent with the GHG reporting methodologies followed by the

USEPA and the State of Washington. It is also consistent with the California Air Resources Board (CARB) programs for inventory and "cap and trade" regulation (see ww2.arb.ca.gov/ghg-inventory-data).

A comment stated that the Agency looked at benefits, but not adverse impacts of fuel bunkering on ships. This comment was based on language in the NOC Engineering Review Worksheet regarding the types of vessels that will be directly fueled with LNG at the site.

This comment regarding the assumptions used in the SEIS analysis indicates that some clarification on the nomenclature that is in the NOC Engineering Review Worksheet may be helpful. The scenario described in the SEIS is accurate and valid for the project. Additional GHG analysis is not necessary because the emissions from the described bunkering operations are valid and account for the emissions related to that operational function.

The LNG that will be transferred across the marine dock at the proposed plant will either fill the LNG fuel tank on a Tote Marine vessel or be used to fill a bunker vessel that would transfer the LNG into the fuel tank of another LNG fueled vessel in the Puget Sound operational area. The NOC Engineering Review Worksheet statement *"[t]he Tacoma LNG Project will only be fueling vessels, not filling tank ships or tank barges that transport bulk LNG"* is referring to vessels that would be transporting bulk LNG for transfer to other, non-specific users. This is the type of activity that would be associated with an export terminal, which this facility is not. Another way to describe this operation would be to look at a tractor-trailer vehicle that transports diesel fuel to retail fueling stations. The diesel in the large tanks on the fuel truck that deliver fuel to the station is considered the "bulk load" or the "bulk diesel" for delivery. The diesel tank on the truck that powers the engine that drives the fuel for a fuel delivery is not considered "bulk" for this scenario. So, if a smaller fuel truck (e.g. like a home heating oil delivery truck) were delivering diesel fuel to fill the operating tank for the truck engine, that would be similar to the bunker vessel described in the FSEIS and the NOC Engineering Review Worksheet. The Agency has updated the worksheet to make this distinction more clear.

Some comments questioned the usage of certain methane leakage rates for maritime vessels in the SEIS. One comment specifically referenced a study done by Puget Sound Energy that was subsequently peer reviewed.

This comment regarding the leakage rate from maritime vessels is accurate in terms of the referencing a peer review comment provided to PSE on their own GHG life-cycle analysis. However, what this comment omits is the PSE response to that peer review comment. That response stated:

> *"PSE Response: PSE does not believe that it would be appropriate to adjust methane emission factors upwards as suggested in this EERA comment. The best available knowledge about emissions from LNG engines is found in the 2017 SINTEF Ocean AS Report (SINTEF Report). EERA is correct that Table 7.2 of the SINTEF Report shows manufacturer testbed estimates of 7.6 gCH4/kWh. However, we do not agree with EERA's suggestion of "adding this 7.6 gCH4/kWh value as a high estimate of the potential emissions from methane slip" based on*

> *EERA's suggestion that "This change would adopt the upper estimates from the SINTEF report that align with established best practices from the IMO report." None of engines considered in the IMO report referenced by EERA incorporated the best practices/slip improvements that are being planned for the TOTE engine retrofits. The SINTEF Report states that if an engine is retrofitted using a suite of best practices/slip improvements consistent with those being implemented by TOTE, methane slip can be reduced to a level of 3.0 to 4.0 gCH4/kWh.1 In choosing to use the 5.3 gCH4/kWh from the SINTEF Report (which reflects actual measurements from low pressure dual fuel engines not benefitting from the full suite of best practices/slip improvements) we were choosing to use the more conservative measured number. This value is not expected to give full credit for the array of methane slip improvements being incorporated as part of the TOTE engine retrofit. Therefore, we stand by the conclusion that the 5.3 gCH4/kWh emission factor is conservative."*

The background information provided by PSE was considered in the preparation of the GHG life-cycle analysis and the original assumption used in for the DSEIS was a methane slip factor of 5.3 g/kWh. Comments were received on the DSEIS regarding this assumption and additional analysis was provided to identify the effect of using an assumption of 6.9 g/kWh. Those results were summarized in the sensitivity analysis in the FSEIS *(see FSEIS, Appendix B, p. 66).* These assumptions regarding methane slippage rate were also discussed in the SEIS comment responses (see *FSEIS, Appendix C.2 – Response to Comments, Response Category 14)*. No further GHG analysis is necessary in response to this comment.

Some comments implied or stated that the SEIS is flawed because it minimized or dismissed impacts to global climate. Other comments stated or suggested that, due to the relatively small percentage of GHG reduction cited in the SEIS, and/or due to the possibility of a GHG increase by a relatively small percentage, that the GHG life-cycle analysis in the SEIS should be redone. Some comments appear to take the position that pursuant to SEPA a significant impact in this situation is "any energy project that does not substantially reduce greenhouse gas emissions."

The Agency disagrees with these comments and believes they set forth an inaccurate description of "significance" under SEPA and do not set forth a lawful basis for concluding that the SEIS analysis of GHGs is flawed or that PSE's application could be denied pursuant to SEPA. "Significant" in SEPA means a reasonable likelihood of more than a moderate adverse impact on environmental quality. See WAC 197-11-794(1). In determining significance, two factors are considered: relative impact compared to existing circumstances and absolute quantitative impact. Here, based upon analyses included in the draft SEIS and the final SEIS, the calculated GHGs for the PSE application would be a reduction of GHGs (based primarily upon existing fuel use displacement), with additional analysis showing a small increase of GHGs based upon the variables considered. *See* e.g. SEIS at 4-13 to 4-14. The SEIS concluded that given the total life-cycle of GHGs even a small increase would not be significant; thus, the Agency reasonably concluded that neither scenario meets SEPA's significance standard. The SEIS does not support denial of PSE's application based upon GHGs emissions as calculated. Moreover, while the Agency pursues policies and programs to reduce GHG emissions and

their impacts in its four-county region, a lawful application of SEPA does not support a conclusion that significance in this case means only a proposal that "substantially reduce[s] greenhouse gas emissions."

The Agency maintains the conclusions identified in the Major Conclusions of the SEIS (*see e.g. Executive Summary ES.4, p. 4*) are valid and support this NOC review and proposed approval. *See also* responses regarding the SEIS' analyses elsewhere in this Response.

A comment stated that the Agency should use its substantive SEPA authority to deny the Order of Approval based on GHGs.

With respect to comments requesting the Agency to exercise its "substantive SEPA authority", please see the above answer and also Response 9 below. Some comments also suggest that Agency permitting decisions and actions should be based on "moral responsibility" and should factor in elements of the Agency's mission and its *2014-2020 Strategic Plan*. Those documents identify goals and areas where resources may be directed for planning purposes by the Agency. However, neither the Agency's mission nor its Strategic Plan negates or overrides the NOC permitting and SEPA requirements the Agency must follow. For more discussion on these requirements please see Responses 1 and 2 in this appendix.

Some comments suggested or stated that PSE has reduced the end-use of LNG for peak shaving. Some comments further stated that a new environmental review was necessary for this reason.

During preparation of the DSEIS, the 10-year assumption was initially used in the analysis based on technical information provided by PSE for use in the GHG life-cycle analysis Comments were received regarding the assumptions of a 10-year peak shaving demand versus a longer period of time for the project. This was addressed in the FSEIS (see *FSEIS, Appendix C.2 – Response to Comments, p. 20, discussion of "Peak Shaving").* A 40-year peak shaving assumption was added to the analysis and included in the sensitivity analysis in the FSEIS *(see FSEIS, Appendix B, p. 66).* The value for peak shaving used in Table 2.6 of the FSEIS relates to the same topic (10-year use versus 40-year use) and the calculation assumption about this was shown and identified, as identified by the comment(s). The sensitivity analysis added the 40-year assumption in the FSEIS in response to this comment. The actual usage of LNG for peak shaving demands could be less than projected levels based on a number of factors. However, the maximum identified uses of the LNG produced were consistent with the methodology chosen by the Agency to evaluate the GHG life-cycle emissions of the proposal and additional analysis is not needed for the purposes of the NOC application review and would not be the basis for reasonably needed additional environmental review for purposes of SEPA.

The impact of the length of LNG peak shaving service on the GHG life-cycle analysis has been considered and additional analysis is not necessary for purposes of NOC or SEPA review.

A comment suggested that the use of natural gas to generate electricity during peak demand times was unnecessary and inflated the GHG emissions in the "no-action alternative".

This comment appears to retain some of the confusion about "peak shaving" and its relationship to electrical power generation. One comment referenced pages in the Draft SEIS (App. B, at 36 and 60) as part of the discussion on peak shaving. In response to comments received on the DSEIS, the analysis on this topic was corrected in the FSEIS (see discussion further down in this response). Additionally, the FSEIS used an aggregate power mix (see discussion further down in this response for information related to the utility mix assumptions). The comparison of the project proposal to the No Action Alternative is focused on fuel substitution and the utility mix assumptions are discussed in detail for the future LNG scenarios in the FSEIS. The GHG analysis includes power generation in both the MGO and the LNG "production to product" calculations. Based on the above, this comment does not support the need for additional supplemental review and the analysis to date provides a reasonable discussion of air related impacts from PSE's proposal.

Some comments suggest that the recent legislation adopted (SB-5116) will lead to a decrease in natural gas demand and that is an additional reason to do additional environmental review of the project.

These comments appear to relate to some confusion about the use of LNG for peak shaving for power generation that was included in the DSEIS. Comments on that document led to a clarification and revision of the final analysis to be clear that LNG was not for use as an electrical generation fuel (see *FSEIS, Appendix C.2 – Response to Comments, p. 20, discussion of "Peak Shaving").* The provisions of SB-5116 apply to the carbon profile of electrical energy supplied to Washington State. While the carbon profile of electrical energy was discussed in the GHG Life Cycle Analysis, no credit was taken for emission reductions that were speculative at the time of the analysis. The utility mix assumptions and the effect on the GHG life-cycle analysis were discussed in the final report and highlighted in the sensitivity analysis in the FSEIS *(see FSEIS, Appendix B, p. 66).* If the Tacoma Power mix was the only power mix used, the calculated GHG reductions identified in the report might have been higher. A cleaner electrical power supply for the site will only lead to greater GHG reductions in the analysis and would not be the basis for reasonably needed additional environmental review of greenhouse gases for purposes of SEPA to inform the NOC application review.

Some comments continue to link the LNG plant and the peak shaving aspect of it to PSE's operation of electrical generation resources.

These comments are addressed above and was also addressed in the response to comments in the FSEIS (see *FSEIS, Appendix C.2 – Response to Comments, p. 20, discussion of "Peak Shaving").*

Some comments suggest or state that the FEIS and the SEIS records do not reflect future requirements and planning scenarios; and that this Agency should do additional review to address the purpose and need for this project.

The Agency received comments similar to this during the SEIS review process and responded to them in that record (see *FSEIS, Appendix C.2 – Response to Comments, Response Categories 6, 7, and 19).* None of the identified "new" information meets the standards in

SEPA for additional supplemental review and the analysis to date provides a reasonable discussion of air related impacts from PSE's proposal.

Some comments expressed concern or opposition to hydraulic fracturing and other fossil fuel extraction methods and the effects of those methods on the surrounding environment.

Natural gas extraction methods are outside the scope of this permitting action since this activity is not being conducted at the proposed PSE facility, as is the effect natural gas extraction methods and/or natural gas itself would have on the environment.

For other concerns regarding the Final Supplemental EIS, please see *FSEIS, Appendix C.2 – Response to Comments* available on the Agency's website: https://pscleanair.gov/460/Current-Permitting-Projects (click the SEIS tab).

8) End Use - Concerns regarding financial impact on ratepayers.

The Agency received comments expressing concern or disapproval about the proposed uses of the project as they relate to project financing and contribution and use by Puget Sound Energy ratepayers.

Project financing or potential financial impacts on ratepayers are not issues before the Agency in review of PSE's NOC application. See also *FSEIS, Appendix C.2 – Response to Comments, p. 2, discussion of "economics"*.

9) FEIS - Non Air Related.

The Agency received comments expressing concern or disapproval of the Final Environmental Impact Statement (FEIS) issued by the City of Tacoma in November 2015, the public process associated with the FEIS, or elements, studies, or conclusions in the FEIS. The Agency also received comments requesting the Agency to deny PSE's NOC application pursuant to the City's FEIS.

As discussed above in Response 7, the information before the Agency does not support a discretionary decision by the Agency to deny PSE's application. The Agency is using its substantive authority pursuant to SEPA to include draft Condition 40 (Final Condition 41) in the Order of Approval *See* Worksheet at 8-9. PSE also has voluntarily agreed to draft Condition 40 (Final Condition 41).

Concerns were raised about the adequacy of the analysis in the City of Tacoma's FEIS (issued Nov. 9, 2015) for PSE's proposal that do not relate to air, such as impacts to fisheries, cultural and tribal resources, water quality, transportation (including rail traffic, surface transportation, emergency and safety response, maritime traffic),

tsunami, volcanic and lahar hazard areas; impacts from fire or explosive events, barging, risks in the event of an earthquake, rail traffic and noise and vibration; and procedural errors related to the FEIS. These non-air related concerns are outside of the scope of the Agency's decision on PSE's NOC application and the SEIS the Agency prepared as part of its review of the NOC application. The Agency did not prepare the FEIS but reviewed and used the FEIS for purposes of its evaluation of air impacts (including cumulative air impacts) for PSE's proposal. Based on this review, the Agency concluded that a SEIS on greenhouse gas impacts was needed. Because the other elements of the environment and concerns identified above are outside of the Agency's authority under the WA Clean Air Act; because the City of Tacoma, and others, are the permitting entities for the subjects raised above and have issued applicable permit decisions or approvals on those items; and because the adequacy of the FEIS was not substantively and/or successfully appealed by any appellant, the concerns and/or comments above challenging the adequacy of City of Tacoma's FEIS are not properly before the Agency at this time and cannot provide the basis for the Agency's decision on PSE's NOC application.

Some comments suggest or state that the FEIS and the SEIS records do not reflect future requirements and planning scenarios; and that this Agency should do additional review to address the purpose and need for this project.

The Agency received comments similar to this during the SEIS review process and responded to them in that record (see *FSEIS, Appendix C.2 – Response to Comments, Response Categories 6, 7, and 19).* None of the identified "new" information meets the standards in SEPA for additional supplemental review and the analysis to date provides a reasonable discussion of air related impacts from PSE's proposal.

10) Alternatives to The Project.

Some comments expressed disapproval of fossil fuel use, or projects related to fossil fuel use. The Agency also received comments expressing support or encouragement for project ideas that describe the use of alternative fuels in the maritime industry, and many other industries and/or suggest that the Agency should have considered "*real world*" options in future scenario analysis, but then identified technologies that are presently emerging.

The project that the Agency is reviewing is PSE's proposal for the Tacoma LNG Project. The Agency is not evaluating other projects or options for reducing GHG emissions from the marine transportation industry as a whole or other industries. The Agency also is not readdressing the purpose and need for PSE's project. See also Responses 3a and 7 and *SEIS, Appendix C.2 – Response to Comments, Response Categories 6, 7, and 19).*

Some comments suggest or state that the FEIS and the SEIS records do not reflect future requirements and planning scenarios; and that this Agency should do additional review

to address the purpose and need for this project.

The Agency received comments similar to this during the SEIS review process and responded to them in that record (see *FSEIS, Appendix C.2 – Response to Comments, Response Categories 6, 7, and 19 and Response 7.* None of the identified "new" information meets the standards in SEPA for additional supplemental review and the analysis to date provides a reasonable discussion of air related impacts from PSE's proposal.

11) Opinions of Other Public Officials.

The Agency received comments that referenced previous comments or statements by public officials expressing disapproval of the proposed LNG application, or portions of studies previously done.

The Agency has considered all comments and statements submitted to the Agency during the NOC and SEPA comment periods. In addition, to the extent that any opinions by officials stated outside of the Agency's processes were similar to comments submitted to the Agency on the SEIS or the draft OOA or accompanying worksheet, please see SEIS Appendix C.2 (Response to Comments) and Responses 1-10 and 12-17 in this appendix.

12) Tribal Consultation.

The Puyallup Tribe of Indians (Tribe) and others comment that the Agency has failed to meet its obligation to consult with the Tribe regarding PSE's NOC application.

The Agency respectfully disagrees that it has failed to meet a legally required obligation to consult as alleged. The Agency is a municipal corporation authorized by the WA Clean Air Act, ch. 70.94 ("Act"); and is not a state Agency or part of the Washington State Department of Ecology. The Tribe has pointed to no specific legal authority in the Act that requires the consultation requested by the Tribe and the Agency cannot add a requirement to the process to review a NOC application after a specific application has been filed with the Agency. Notwithstanding the above, the Agency has communicated with the Tribe about PSE's proposal since 2015, including but not limited to also meeting in person with the Tribal leadership and Tribal staff in 2017 and providing records and information to the Tribe as requested in 2017, 2018 and 2019. *See also* Response 5 of the FSEIS in Appendix C.2. The Tribe has provided comments to the Agency on the draft SEIS and the draft NOC OOA and worksheet and the Agency has carefully considered all information provided to it by the Tribe.

See also Response 13 in this appendix.

13) Tribal Lands.

Comments asserted that the proposed LNG Plant and its associated pipelines are within and adjacent to the 1873 Survey Boundary for the Puyallup Tribe's Reservation and the proposed tank sits on man-made fill, which covers the lands which the Puyallup Tribe used for hunting, fishing, and ceremonial practices.

The Agency requested PSE to address the above comments and confirm that PSE's proposed LNG Plant is not located on existing or future Tribal or Reservation lands (including not located within the 1873 Survey Boundary) and that it has permission from the lands owner(s) to proceed with its proposal. In response, PSE stated:

> *"As specified in the FEIS, the Tacoma LNG facility will be located on land leased from the Port of Tacoma. A copy of this lease can be found at the Port of Tacoma's web page (https://www.portoftacoma.com/puget-sound-energy-lng-facility) and the relevant provisions and site map are attached to this response. This property is outside the 1873 Survey Boundary as is shown on the attached Puyallup Tribe map, found on the website for the Tribe's economic development arm (Marine View Ventures) (https://www.marineviewventures.com/real-estate/). As can be readily seen, this map shows the Tacoma LNG site to be outside the 1873 Survey Boundary. The Puyallup Tribe of Indians Settlement Act of 1989, an Act of Congress, relinquished the Puyallup Tribe's ownership claims over the Tacoma LNG site. The Puyallup Tribe relinquished these claims in return for other property and a large cash settlement. A copy of that Act can be found at https://www.congress.gov/bill/101st-congress/house-bill/932/text."*

Some comments have asserted general impacts to tribal or treaty rights from PSE's application. Based on the information before it and the specific NOC application before it, the Agency is not aware of tribal or treaty rights – separate from the assertions related to tribal consultation or lands discussed above -- that are to be impacted that have not been identified or evaluated by the City of Tacoma's FEIS. See also Responses 3, 9 in this appendix. Finally, the Agency does not have jurisdiction over any approvals related to the pipelines associated with PSE's proposal; the regulatory review for any associated pipelines was performed by other agencies. *See also* Final SEIS, Appendix C.2, 4-5.

See also Response 12 in this appendix.

14) General Opposition.

The Agency received comments expressing general opposition to PSE's proposal.

Following a careful review of all comments submitted on Proposed Order of Approval No. 11386, the Agency believes that Final Order of Approval No. 11386 includes and/or relies upon

reasonable assumptions, data, information and analyses to adequately evaluate and condition the emissions from the applicant's NOC application. This decision is consistent with applicable legal authorities.

15) General Support.

The Agency received comments expressing general support for PSE's proposal.

Following a careful review of all comments submitted on Proposed Order of Approval No. 11386, the Agency believes that Final Order of Approval No. 11386 includes and/or relies upon reasonable assumptions, data, information and analyses to adequately evaluate and condition the emissions from the applicant's NOC application. This decision is consistent with applicable legal authorities.

16) Other State or Federal Laws Not Discussed in Permit.

Comments were received that stated or suggested the Agency did not consider all applicable laws when issuing the Proposed Order of Approval. These suggestions included, but were not limited to, the Washington State Growth Management Act and critical areas ordinances, Washington State laws governing the pilotage of vessels, and various federal and state regulations related to fire and safety.

The Agency reviewed and evaluated these comments. The laws and/or regulations mentioned are outside the Agency's jurisdiction. For more discussion on laws and/or regulations within the Agency's jurisdiction that are discussed in the permit, please see Response 1 and 2 in this appendix and the NOC Engineering Review Worksheet.

For discussion on SB-5116, please see Responses 5 and 7 in this appendix.

17) Form Letters and Petitions.

During the comment period, the Agency received three petitions and several thousand form emails expressing various concerns about the proposed project as well as general opposition to the project. Samples of the form letters are addressed as comments and can be found in Table A.3-1 and the comment database. Some commenters added statements or concerns to the form letters, and two of the three petitions provided room for signers / commenters to write in additional statements or concerns. Many of these statements overlapped between these mediums. The Agency has read and evaluated all of these statements and concerns and a general list of topics included in these comments is found below. In response, please see Responses 1 through 16 above. Please also see Appendix C.2 of the Final SEIS issued by the Agency on March 29, 2019. These petitions can be viewed in their entirety in Appendix C.

General topics included in form letters and petitions:

- Support for alternative and/or renewable energy
- Concerns about water quality and impacts on aquatic ecosystems and wildlife
- Concerns about climate change and its effects
- Concerns about Tribal rights, land and cultural resources and tribal consultation
- Opposition to the extraction and use of fossil fuels
- Opposition to hydraulic fracturing
- Concerns about safety in and around the proposed project
- Concerns about air pollution, either cumulative or related to the proposed project
- Concerns about non-air related pollution
- Concerns about the health effects of pollution
- Concerns about the status of permits during construction
- Concerns about possible violations of non-air related regulations or laws
- Concerns about fossil fuel spills in the Puget Sound
- Concerns about earthquakes in and around the Puget Sound
- Concerns about the Supplemental EIS published by the Agency
- Concerns about the FEIS published by the City of Tacoma
- Concerns about the funding structure of the facility and the impact on PSE ratepayers
- Support for efforts and laws aimed at deterring or slowing climate change
- General support for a healthy environment
- General opposition to the proposed project

In addition, related to the comments above, some concerns expressed were inaccurate as they pertain to the PSE proposal or as they described PSE's proposal. For example, some commenters expressed opposition to hydraulic fracturing and/or fossil fuel exploration in the Puget Sound, opposition to the export of LNG, and opposition to plastic production. None of those activities are included in the NOC application.

Puget Sound Clean Air Agency thanks all commenters for comments submitted on Proposed Order of Approval No. 11386 and the worksheet supporting it.

NOC Order of Approval No. 11386

Appendix A.3: Comment Summary Table

This comment summary table is a list of all participants who submitted unique comments to the Agency during the public commenting process and the issues associated with each comment. The comment summary table is organized in alphabetical order by name for Tribal, Federal, Local, or Organizations. For groups of individuals, comments are organized by the last name and first initial of the first commenter. For individuals, comments are organized by last name and first initial. All comments are tagged with a unique comment identification number. Commenters who submitted multiple unique letters should refer to the comment number to locate their letters in Appendix B. A summary of issues associated with each form comment can be found at the end of this comment summary table. Additional issues found in petitions and form comments are discussed in Response 17.

To view unique comments, form letters/emails, and petitions, refer to Appendices B and C, which can be found online at http://www.pscleanair.org/460/Current-Permitting-Projects.

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Tribal	
_0891 Puyallup Tribe of Indians	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 1. Permitting Process 2. Permitting Requirements 3. Permit Conditions 4. Emission Estimates for non-GHG Pollutants 5. SEPA Documents - Air Related 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Paddock, R_0841 Region 10 EPA Tribal Consortium (RTOC)	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 9. FEIS - Non-Air Related
Ward, E_0831 Sauk-Suiattle Indian Tribe	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related
Federal	
Familiare, C_0830 U.S. Environmental Protection Agency, Region 10	3(a). Suggested Permit Conditions
Local	
Petrich, C_0063 Port of Tacoma	15. General Support
Organizations	
_0890 EarthJustice	10. Alternatives to the Project 12. Tribal Consultation 13. Tribal Lands 14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	1. Permitting Process 2. Permitting Requirements 3. Permit Conditions 4. Emission Estimates for non-GHG Pollutants 5. SEPA Documents - Air Related 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 8. End Use 9. FEIS - Non-Air Related
Beres, L_0020 Earth Ministry	12. Tribal Consultation 14. General Opposition
Dobson, D_0065 Renton Chamber of Commerce	15. General Support
Griffith, E_0059 New Progressive Alliance	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Hillman, S_0509 Power Past Fracked Gas Coalition	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Johnson , K_0006 Association of Washington Business	15. General Support
Kendall, B_0021 Economic Development Board	15. General Support
Kenny, R_0499 Clean Energy	15. General Support
Landfried, K_0050 McDermott International, Inc.	15. General Support
Likkel, R_0489 Western Refinery Services, Inc.	15. General Support
Malott, M_0889 Citizens for a Healthy Bay	10. Alternatives to the Project 12. Tribal Consultation 13. Tribal Lands 14. General Opposition 2. Permitting Requirements 3(a). Suggested Permit Conditions 3. Permit Conditions 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Mayer, A_0389 Mount Vernon Chamber of Commerce	15. General Support
Milton, A_0466 Ferndale Chamber of Commerce	15. General Support
Myers, T_0388 Washington Policy Center	15. General Support
Myers, T_0856 Washington Policy Center	14. General Opposition 6. Construction Status
Neal, M_0506 Tacoma - Pierce County Chamber	15. General Support
O'Donnel, T_0039 IBEW Local 76	15. General Support
Occhiogrosso, G_0498 Bellingham Regional Chamber of Commerce	15. General Support
Pierce, P_0392 Economic Alliance of Snohomish County	15. General Support

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Reay, A_0480 Seattle Southside Chamber	15. General Support
Riker, M_0078 Washington State Building and Construction Trades Council	15. General Support
Rushton, M_0483 Bethel School District	15. General Support
Schaffert, D_0075 Thurston County Chamber	15. General Support
Schrappen, P_0469	15. General Support
Washington Maritime Federation	15. General Support
Smith, L_0044 Lakewood Chamber of Commerce	15. General Support
Stokes, C_0491 Alliance of Western Energy Consumers	15. General Support
Individuals	
Anonymous_0182	14. General Opposition
Anonymous_0232	12. Tribal Consultation 14. General Opposition
Anonymous_0381	14. General Opposition
Anonymous_0497	15. General Support
Bee_0721	14. General Opposition
Chante_0101	14. General Opposition
Dads_0146	14. General Opposition
Donna_0159	14. General Opposition
Jane_0132	14. General Opposition
Meg_0221	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
NerfMC_0205	14. General Opposition
NVenture_0180	14. General Opposition
Oryx_0163	12. Tribal Consultation 14. General Opposition 8. End Use 9. FEIS - Non-Air Related
Roberta_0275	14. General Opposition
Sherlynn_0216	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Stephanie_0195	14. General Opposition
Tvsulliv_0116	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Willa_0120	14. General Opposition
Anonymous_0004	1. Permitting Process 14. General Opposition
Abel, M_0445	15. General Support
Abramczyk, M_0284	12. Tribal Consultation 14. General Opposition
Adams, M_0802	14. General Opposition
Adkins, J_0001	14. General Opposition 2. Permitting Requirements
Adrien, J_0472	15. General Support
Agnello, E_0298	14. General Opposition
Akermanis, T_0151	14. General Opposition
Akins, J_0575	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Albert, D_0610	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Aldrich, A_0200	14. General Opposition
Alessio, J_0342	14. General Opposition
Aliabadi, G_0455	15. General Support
Allred, C_0346	14. General Opposition
Allyn, J_0359	12. Tribal Consultation 14. General Opposition
Alterio, J_0307	14. General Opposition
Ambrose, C_0252	14. General Opposition
Ambrose, C_0257	12. Tribal Consultation 14. General Opposition
Amiad, E_0277	14. General Opposition
Anderson, D_0281	14. General Opposition
Anderson, E_0549	14. General Opposition
Anderson, G_0310	12. Tribal Consultation 14. General Opposition
Anderson, G_0848	12. Tribal Consultation 14. General Opposition 2. Permitting Requirements 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Anderson, J_0462	15. General Support

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Anderson, N_0692	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Anderson, S_0552	12. Tribal Consultation 14. General Opposition 2. Permitting Requirements 7. FSEIS Factors, Methods, and Conclusions
Andreeva, M_0002	14. General Opposition
Andrezejewski, J_0003 Indivisible Tacoma	13. Tribal Lands 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Andrzejewski, J_0803	14. General Opposition 9. FEIS - Non-Air Related
Ang, K_0820	14. General Opposition
Angell, T_0415	15. General Support
Antush, T_0104	14. General Opposition
Arenson, B_0781	1. Permitting Process 14. General Opposition
Arent, S_0676	14. General Opposition
Arnold, O_0787	14. General Opposition
Arvizu, J_0597	1. Permitting Process 11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 6. Construction Status
Ashlie-Vinke, E_0418	15. General Support
Atly, E_0213	12. Tribal Consultation 14. General Opposition
Aufrecht, M_0644	12. Tribal Consultation 14. General Opposition
Avery, J_0005	12. Tribal Consultation 14. General Opposition
Avni, A_0579	1. Permitting Process 12. Tribal Consultation 13. Tribal Lands 14. General Opposition 8. End Use 9. FEIS - Non-Air Related
Babbitt, D_0432	15. General Support
Bachman, G_0451	15. General Support
Backer, B_0473	15. General Support
Bailey, J_0413	15. General Support
Baird-Joshi, S_0591	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	7. FSEIS Factors, Methods, and Conclusions
Baker, M_0411	15. General Support
Ball, J_0103	14. General Opposition
Barbee, S_0568	1. Permitting Process 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Barbee, S_0792	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Barde-MacNamara, D_0122	14. General Opposition
Bartels, A_0487	15. General Support
Beal, L_0097	1. Permitting Process 13. Tribal Lands 14. General Opposition 8. End Use 9. FEIS - Non-Air Related
Beal, P_0008	12. Tribal Consultation 14. General Opposition 8. End Use 9. FEIS - Non-Air Related
Bean, A_0699	12. Tribal Consultation 14. General Opposition
Bean, D_0741	14. General Opposition 8. End Use
Benner, R_0447	15. General Support
Bennett, B_0399	15. General Support
Bennett, R_0755	14. General Opposition
Bennett, W_0355	14. General Opposition
Bentler, J_0386	15. General Support
Bentley, D_0478	15. General Support
Berg, S_0426	15. General Support
Berkholtz, R_0648	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 2. Permitting Requirements 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Bernthal, J_0885	12. Tribal Consultation 14. General Opposition 16. Other State or Federal Laws Not Discussedin Permit 7. FSEIS Factors, Methods, and Conclusions
Betz-Zall, J_0688	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Bickel, A_0545	12. Tribal Consultation 14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	6. Construction Status 9. FEIS - Non-Air Related
Bickenbach, D_0467	15. General Support
Bingham, B_0169	14. General Opposition
Bishop, M_0358	14. General Opposition
Blackbird, M_0760	13. Tribal Lands 14. General Opposition 9. FEIS - Non-Air Related
Blackson-Martinez, J_0230	14. General Opposition
Blanchard, P_0379	14. General Opposition
Bloom, L_0323	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Bluhm, D_0826	14. General Opposition
Board, K_0430	15. General Support
Boehm, L_0282	14. General Opposition
Bolin, A_0259	14. General Opposition
Bond, P_0742	14. General Opposition
Booker, N_0235	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Bourscheidt, B_0162	14. General Opposition
Bower, J_0456	15. General Support
Bowers, G_0767	15. General Support
Boyd, M_0633	1. Permitting Process
Boyd, M_0665	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Braaten, C_0539	1. Permitting Process 10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 16. Other State or Federal Laws Not Discussed in Permit 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Braaten, C_0608	1. Permitting Process 14. General Opposition 9. FEIS - Non-Air Related
Braaten, C_0609	12. Tribal Consultation 13. Tribal Lands 14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Braaten, C_0715	1. Permitting Process 14. General Opposition 9. FEIS - Non-Air Related
Braciulyte, L_0762	14. General Opposition
Bramson, R_0416	15. General Support
Branch, H_0270	14. General Opposition
Braun, B_0347	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Brenno, D_0217	12. Tribal Consultation 14. General Opposition
Brewer, H_0009	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Brewer, H_0268	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition
Brewer, H_0329	14. General Opposition
Brewer, H_0348	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 9. FEIS - Non-Air Related
Bridgeford, C_0703	14. General Opposition 6. Construction Status 9. FEIS - Non-Air Related
Briggs, R_0600	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Briggs, R_0601	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Briggs, R_0602	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Briggs, R_0603	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 8. End Use 10. Alternatives to the Project
Briggs, R_0604	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Briggs, R_0605	1. Permitting Process 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Bright, K_0402	15. General Support
Brockway, A_0737	1. Permitting Process 12. Tribal Consultation 14. General Opposition 6. Construction Status
Brokaw, D_0408	15. General Support
Bronoske Sr, B_0470	15. General Support
Bronson, L_0746	15. General Support

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Brown, C_0191	14. General Opposition
Brown, R_0010	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Brumett, C_0671	14. General Opposition
Bryan, A_0704	12. Tribal Consultation 14. General Opposition 3(a). Suggested Permit Conditions
Bryson, C_0011	15. General Support
Bulling, J_0541	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Burcell, S_0364	12. Tribal Consultation 14. General Opposition
Burke, S_0362	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Burns, K_0816	14. General Opposition
Burta, C_0007	14. General Opposition
Burton, E_0853	1. Permitting Process 14. General Opposition 2. Permitting Requirements
Burton, E_0854	1. Permitting Process 15. General Support
Campbell, C_0738	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 6. Construction Status 9. FEIS - Non-Air Related
Canny, M_0012	14. General Opposition
Carawan, H_0325	13. Tribal Lands 14. General Opposition
Carleton, J_0201	14. General Opposition
Carlton, J_0836	13. Tribal Lands 14. General Opposition 4. Emission Estimates for non-GHG Pollutants 7. FSEIS Factors, Methods, and Conclusions
Carpenter, J_0087	14. General Opposition
Carruthers, C_0698	14. General Opposition 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Case, D_0727	12. Tribal Consultation 13. Tribal Lands 14. General Opposition
Caskey, G_0507	13. Tribal Lands

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	14. General Opposition 9. FEIS - Non-Air Related
Catsi, M_0013	15. General Support
Catsi, M_0492	15. General Support
Ceravolo, T_0294	12. Tribal Consultation 14. General Opposition
Chaffin, A_0407	15. General Support
Chandler, M_0014	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 4. Emission Estimates for non-GHG Pollutants
Chapman, B_0296	14. General Opposition
Christensen, G_0425	15. General Support
Christie, B_0288	14. General Opposition
Christie, G_0799	14. General Opposition
Chudy, C_0696	12. Tribal Consultation 14. General Opposition 2. Permitting Requirements 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Church, B_0662	12. Tribal Consultation 14. General Opposition 3(a). Suggested Permit Conditions 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Church, B_0733	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Ciolek, C_0503	15. General Support
Claus McGahan, D_0576	10. Alternatives to the Project 14. General Opposition
Coachaveli, T_0305	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Coerver, M_0297	14. General Opposition
Cohen, J_0245	14. General Opposition
Cole, P_0817	12. Tribal Consultation 14. General Opposition
Conway, L_0719	14. General Opposition
Cook, S_0225	14. General Opposition
Corbett, A_0157	14. General Opposition
Cornett, S_0706	12. Tribal Consultation

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	14. General Opposition 2. Permitting Requirements
Cornwell, L_0570	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Corr, J_0015	10. Alternatives to the Project 14. General Opposition
Corvair, C_0137	14. General Opposition
Courtemanche, W_0595	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Covarribias, M_0783	13. Tribal Lands 14. General Opposition
Covarrubias, M_0141	14. General Opposition
Covarrubias, M_0193	12. Tribal Consultation 14. General Opposition
Cox, C_0112	14. General Opposition
Craighead, T_0341	14. General Opposition
Craighead, T_0352	14. General Opposition
Craven, K_0385	15. General Support
Cruz, D_0525	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Currah, N_0672	12. Tribal Consultation 14. General Opposition 2. Permitting Requirements 7. FSEIS Factors, Methods, and Conclusions
Curry, C_0267	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Curtis, K_0479	15. General Support
Curtiss, C_0262	14. General Opposition
Cutting, M_0749	14. General Opposition
D, M_0189	14. General Opposition
Dambergs, L_0606	14. General Opposition
Damon, B_0384	13. Tribal Lands 14. General Opposition
Daniels, K_0098	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Dao, P_0436	15. General Support
Darneille, J_0709	1. Permitting Process 12. Tribal Consultation 14. General Opposition 2. Permitting Requirements 6. Construction Status
Davern, N_0449	15. General Support
Davern, N_0460	15. General Support
Davis, V_0357	14. General Opposition 9. FEIS - Non-Air Related
Dawn, S_0331	12. Tribal Consultation 14. General Opposition
Day, A_0626	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Day, D_0147	14. General Opposition
de Beeck, N_0016	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
De Souza, R_0589	10. Alternatives to the Project 14. General Opposition
Deluzlewis, D_0124	14. General Opposition
Dempsey, B_0771	15. General Support
Denny, G_0167	14. General Opposition
deSmet, C_0338	12. Tribal Consultation 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions
Desouza, R_0538	13. Tribal Lands 14. General Opposition 9. FEIS - Non-Air Related
Detzer, G_0886	12. Tribal Consultation 13. Tribal Lands 14. General Opposition
Diaz, S_0237	14. General Opposition
Dilworth, E_0650	1. Permitting Process
Dilworth, E_0807	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
DiNino, L_0017	14. General Opposition 6. Construction Status
Doremusi, J_0481	15. General Support
Dorsey, J_0143	14. General Opposition
Doty, A_0693	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	8. End Use 10. Alternatives to the Project
Douglass, D_0519	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Desiree Douglass_0870	1. Permitting Process 2. Permitting Requirements 12. Tribal Consultation 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Douglass, D_0536	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 6. Construction Status
Douglass, D_0578	14. General Opposition
Douglass, D_0724	10. Alternatives to the Project 11. Opinions of Other Public Officials 14. General Opposition 6. Construction Status
Drake, J_0851	12. Tribal Consultation 14. General Opposition 2. Permitting Requirements 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Dran, T_0115	14. General Opposition
Drllevich, J_0446	15. General Support
Dubois, C_0535	14. General Opposition 16. Other State or Federal Laws Not Discussedin Permit 7. FSEIS Factors, Methods, and Conclusions
Duerr, L_0136	14. General Opposition
Dulfer, A_0018	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Dunbar, M_0019	11. Opinions of Other Public Officials 14. General Opposition 9. FEIS - Non-Air Related
Duncan, A_0290	10. Alternatives to the Project 13. Tribal Lands 14. General Opposition
Durr, R_0846	14. General Opposition 9. FEIS - Non-Air Related
Earl, C_0778	14. General Opposition
Edlund, E_0628	1. Permitting Process 12. Tribal Consultation 14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	7. FSEIS Factors, Methods, and Conclusions
Edmark, S_0022	10. Alternatives to the Project 12. Tribal Consultation 13. Tribal Lands 14. General Opposition 2. Permitting Requirements 3. Permit Conditions 4. Emission Estimates for non-GHG Pollutants 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 8. End Use 9. FEIS - Non-Air Related
Elliott, G_0833	12. Tribal Consultation 14. General Opposition
Ellis, E_0246	14. General Opposition
Ellis, P_0452	15. General Support
Elstrom, G_0387	15. General Support
F, L_0177	14. General Opposition
F, W_0125	14. General Opposition
Faas, S_0227	14. General Opposition
Fairhurst, R_0782	10. Alternatives to the Project 14. General Opposition
Farrell, N_0679	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Feist, C_0828	14. General Opposition 9. FEIS - Non-Air Related
Ferguson, J_0664	14. General Opposition 2. Permitting Requirements 5. SEPA Documents - Air Related 9. FEIS - Non-Air Related
Ferrari, L_0531	14. General Opposition 9. FEIS - Non-Air Related
Fielding Lopez, E_0375	14. General Opposition
Figueroa, J_0758	15. General Support
Firethunder, T_0743	14. General Opposition 9. FEIS - Non-Air Related
Flood, M_0219	14. General Opposition
Forest, A_0197	14. General Opposition
Fort-Johnson, A_0419	15. General Support
Fosness, T_0428	15. General Support
Foster, M_0772	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Freeman, L_0581	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Freiberg, P_0023	14. General Opposition
Freiberg, P_0784	14. General Opposition
French, A_0239	14. General Opposition
Fuller, J_0422	15. General Support
Gaines, D_0429	15. General Support
Gale, B_0815	14. General Opposition
Gale, J_0825	14. General Opposition 9. FEIS - Non-Air Related
ganMoryn, C_0372	12. Tribal Consultation 14. General Opposition
Garcia, J_0421	15. General Support
Gault, A_0212	14. General Opposition
Gee, J_0468	15. General Support
Gee, J_0504	15. General Support
Genco, A_0024	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Gentry, T_0175	14. General Opposition
Gentry, T_0255	14. General Opposition
Gering, D_0814	15. General Support
Ghitis, E_0598	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 6. Construction Status 9. FEIS - Non-Air Related
Giannini, C_0553	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 2. Permitting Requirements 8. End Use 9. FEIS - Non-Air Related
Giannini, C_0694	14. General Opposition 9. FEIS - Non-Air Related
Gibson, L_0105	14. General Opposition
Gibson, M_0584	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 2. Permitting Requirements

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Giddings, R_0025	14. General Opposition 9. FEIS - Non-Air Related
Giddings, R_0809	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Giles, J_0302	14. General Opposition
Glass, L_0615	1. Permitting Process 12. Tribal Consultation 13. Tribal Lands 14. General Opposition 2. Permitting Requirements
Glatt, D_0505	15. General Support
Gleysteen, M_0172	12. Tribal Consultation 14. General Opposition
Glover, J_0343	12. Tribal Consultation 14. General Opposition
Godby, O_0695	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Goldberg, J_0593	12. Tribal Consultation 14. General Opposition 8. End Use 9. FEIS - Non-Air Related
Golding, K_0272	14. General Opposition
Golding, W_0732	1. Permitting Process 12. Tribal Consultation 14. General Opposition 2. Permitting Requirements
Gonzales, M_0658	12. Tribal Consultation 14. General Opposition 8. End Use
Gordon, T_0629	13. Tribal Lands 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Gordon, T_0599	14. General Opposition
Graham, H_0319	14. General Opposition
Granquist, J_0486	15. General Support
Grape, S_0168	14. General Opposition
Graser-Lindsey, E_0096	14. General Opposition
Greenberg, S_0242	14. General Opposition
Greenberg, S_0808	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Greene, G_0796	15. General Support
Gridley, J_0026	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Griffen, C_0393	15. General Support
Griffin, S_0485	15. General Support
Griffiths, E_0730	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Grossman, Z_0027	12. Tribal Consultation
Gudgell, J_0630	1. Permitting Process 13. Tribal Lands 14. General Opposition 9. FEIS - Non-Air Related
Habib, D_0295	14. General Opposition
Hackett, M_0306	12. Tribal Consultation 14. General Opposition
Hackman, C_0131	14. General Opposition
Haigh, B_0028	14. General Opposition
Haines, M_0029	15. General Support
Haines, M_0471	15. General Support
Halinen, J_0031	14. General Opposition 9. FEIS - Non-Air Related
Halinen, J_0030	10. Alternatives to the Project 14. General Opposition
Hall, K_0032	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 9. FEIS - Non-Air Related
Hallman, H_0376	14. General Opposition
Hansen, D_0102	14. General Opposition
Harris, C_0414	15. General Support
Harris, E_0494	15. General Support
Harris, M_0254	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Harrison, A_0236	14. General Opposition
Harrison, H_0736	12. Tribal Consultation 14. General Opposition 6. Construction Status
Harvey, H_0459	15. General Support
Hashemi, S_0156	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Hastings, C_0211	14. General Opposition
Haug, A_0639	14. General Opposition 6. Construction Status
Haverstein, B_0845	14. General Opposition
Hawes, C_0279	14. General Opposition
Hawkins, G_0129	14. General Opposition
Haxtema, R_0725	12. Tribal Consultation 14. General Opposition 6. Construction Status
Hayes, B_0292	14. General Opposition
Heart, D_0544	12. Tribal Consultation 14. General Opposition 6. Construction Status
Hedgepath, J_0805	14. General Opposition
Hendershot, J_0261	14. General Opposition
Henderson, S_0714	10. Alternatives to the Project 14. General Opposition
Hendrix, A_0144	14. General Opposition
Herbert, D_0033	14. General Opposition
Herbert, J_0847	14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Herbert, P_0335	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Herbert, RN BSN, J_0285	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 6. Construction Status
Herde, E_0369	14. General Opposition
Herold, K_0271	14. General Opposition
Hersey, R_0441	15. General Support
Hewitson, N_0152	14. General Opposition
Hewitt, K_0309	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Hickey, C_0266	14. General Opposition
Higley, R_0540	1. Permitting Process 10. Alternatives to the Project 13. Tribal Lands

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	14. General Opposition 4. Emission Estimates for non-GHG Pollutants 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Hildreth, J_0349	14. General Opposition
Hill, D_0034	14. General Opposition 9. FEIS - Non-Air Related
Hill, D_0035	14. General Opposition
Hill, M_0457	15. General Support
Hitchens, B_0139	14. General Opposition
Hodgin, R_0582	14. General Opposition
Holland, M_0218	14. General Opposition
Holloway, K_0036	14. General Opposition 6. Construction Status 9. FEIS - Non-Air Related
Holm, P_0322	14. General Opposition
Holman-Anderson, L_0340	14. General Opposition
Holtz, J_0668	1. Permitting Process 14. General Opposition
Holtz, R_0520	14. General Opposition 16. Other State or Federal Laws Not Discussedin Permit 7. FSEIS Factors, Methods, and Conclusions
Holtz, R_0731	12. Tribal Consultation 14. General Opposition
Holtz, R_0873	11. Opinions of Other Public Officials 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Hope, H_0273	14. General Opposition
Hope, H_0344	14. General Opposition
Horst, L_0038	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Hoshiko, D_0356	13. Tribal Lands 14. General Opposition
Houskeeper, B_0454	15. General Support
Hower, K_0220	13. Tribal Lands 14. General Opposition
Huffine, S_0256	14. General Opposition
Hulse, K_0461	15. General Support
Huntley, J_0153	14. General Opposition
Hutchinson, M_0037 GeoEngineers Inc	15. General Support

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Idzerda, R_0542	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Imad, T_0406	15. General Support
Imamura, M_0763	15. General Support
Isaac, C_0040	14. General Opposition
Isaac, C_0631	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Ivey, T_0685	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
J., B_0594	14. General Opposition
Jacky, S_0041	10. Alternatives to the Project 12. Tribal Consultation 13. Tribal Lands 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Jerome, C_0394	15. General Support
Jester, C_0586	1. Permitting Process 11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 6. Construction Status
Jeter, G_0258	14. General Opposition
Johanson, S_0042	10. Alternatives to the Project 14. General Opposition 8. End Use
Johnson, B_0231	14. General Opposition
Johnson, B_0822	14. General Opposition
Johnson, J_0824	14. General Opposition
Johnson, K_0291	14. General Opposition
Johnson, K_0770	15. General Support
Johnston, T_0241	14. General Opposition
Johson, J_0043	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Jolibois, K_0779	14. General Opposition
Jones, C_0823	14. General Opposition
Jones, K_0620	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 8. End Use

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Jones, K_0689	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Kaviar, S_0260	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Kay, L_0108	14. General Opposition
Kay, S_0228	14. General Opposition
Keefe, G_0334	12. Tribal Consultation 14. General Opposition 8. End Use
Keller, K_0198	14. General Opposition
Kellogg, D_0844	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions
Kelly, D_0493	15. General Support
Kelsey, S_0528	12. Tribal Consultation 14. General Opposition
Kendall, B_0465	15. General Support
Kendall, B_0795	15. General Support
Kimmerling, M_0686	14. General Opposition 4. Emission Estimates for non-GHG Pollutants 7. FSEIS Factors, Methods, and Conclusions
King, S_0176	14. General Opposition
Kingfisher, R_0821	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Kinney, J_0178	14. General Opposition
Kirby, R_0551	12. Tribal Consultation 14. General Opposition 8. End Use 9. FEIS - Non-Air Related
Kirkpatrick, D_0832	14. General Opposition 3. Permit Conditions 4. Emission Estimates for non-GHG Pollutants 6. Construction Status
Kirschenbaum, M_0458	15. General Support
Kitchell, M_0723	12. Tribal Consultation 14. General Opposition
Kitson, J_0166	14. General Opposition
Kittredge Quilcene, K_0366	14. General Opposition
Klapperich, M_0412	15. General Support

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Klein, H_0118	12. Tribal Consultation 13. Tribal Lands 14. General Opposition
Klein, K_0117	12. Tribal Consultation 13. Tribal Lands 14. General Opposition
Knapp, A_0317	14. General Opposition
Knapp, R_0632	1. Permitting Process 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Knoll, C_0653	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Knott, M_0127	14. General Opposition
Kocher, T_0354	12. Tribal Consultation 14. General Opposition
Koehler, M_0339	12. Tribal Consultation 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions
Kohler, M_0249	14. General Opposition
Kong, A_0337	14. General Opposition
Kopec, C_0612	1. Permitting Process 10. Alternatives to the Project 14. General Opposition
Kroeker, A_0533	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 16. Other State or Federal Laws Not Discussedin Permit 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Kupinse, W_0712	1. Permitting Process 14. General Opposition
L, O_0060	12. Tribal Consultation 14. General Opposition
Lamb, C_0596	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions
Lambert, D_0095	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition
Lambert, D_0812	14. General Opposition
Lambert, R_0409	15. General Support
Landry-Livshetz, M_0233	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Lane, T_0240	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions
Lapointe, C_0202	14. General Opposition
Lau, B_0643	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Lawhon, K_0537	14. General Opposition 9. FEIS - Non-Air Related
Lawhon, K_0800	14. General Opposition 9. FEIS - Non-Air Related
Lawrence, G_0849	12. Tribal Consultation 14. General Opposition 2. Permitting Requirements 5. SEPA Documents - Air Related
Leistman, V_0711	1. Permitting Process 14. General Opposition
Lem, MD CCFP FCFP, M_0244	14. General Opposition
Leonard, J_0585	12. Tribal Consultation 14. General Opposition
Leonard, L_0045	10. Alternatives to the Project 13. Tribal Lands 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Lesinski, D_0437	15. General Support
Levine, R_0550	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Lindberg, L_0238	12. Tribal Consultation 14. General Opposition
Lindley, J_0320	14. General Opposition
Lindley, J_0590	14. General Opposition 16. Other State or Federal Laws Not Discussedin Permit 7. FSEIS Factors, Methods, and Conclusions
Linville, T_0397	15. General Support
Lioy, R_0046	12. Tribal Consultation 13. Tribal Lands 14. General Opposition
Livingston, T_0311	12. Tribal Consultation 14. General Opposition
Llewyllson, S_0353	14. General Opposition
Locsin, A_0675	14. General Opposition
Lohr, V_0521	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Lohr, V_0534	14. General Opposition
Lohr, V_0611	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Lohr, V_0646	7. FSEIS Factors, Methods, and Conclusions
Lohr, V_0674	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Lohr, V_0761	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Lombardo, D_0047	14. General Opposition
Loucky, J_0280	14. General Opposition
Loyd, T_0109	14. General Opposition
Lucas, K_0647	1. Permitting Process 11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 6. Construction Status
Lundgaard, B_0190	14. General Opposition
Lynn, J_0842	12. Tribal Consultation 14. General Opposition 4. Emission Estimates for non-GHG Pollutants 7. FSEIS Factors, Methods, and Conclusions
M, T_0324	14. General Opposition
Mackey, M_0048	12. Tribal Consultation 14. General Opposition
MacLaurin, R_0874	12. Tribal Consultation 14. General Opposition 6. Construction Status
Magin, N_0145	14. General Opposition
Mahaulu-Stephens, P_0126	14. General Opposition
Malone, C_0174	12. Tribal Consultation 14. General Opposition 8. End Use
Mangan, R_0383	14. General Opposition
Mangan Kindt, C_0088	12. Tribal Consultation 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Mangan Kindt, C_0089	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Mangan Kindt, C_0327	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	7. FSEIS Factors, Methods, and Conclusions
Mangan Kindt, C_0328	1. Permitting Process 11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Mannetti, J_0410	15. General Support
Manor, T_0278	10. Alternatives to the Project 14. General Opposition 9. FEIS - Non-Air Related
Manthey, B_0768	15. General Support
Markos, K_0424	15. General Support
Marsden, P_0373	14. General Opposition
Marshall, J_0229	14. General Opposition
Martin, C_0206	14. General Opposition
Martin, R_0522	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Martinson, J_0645	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 16. Other State or Federal Laws Not Discussedin Permit 6. Construction Status 9. FEIS - Non-Air Related
Masco, M_0558	14. General Opposition 3(a). Suggested Permit Conditions
Masco, M_0561	14. General Opposition 3. Permit Conditions
Masco, M_0651	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Masco, M_0680	14. General Opposition 2. Permitting Requirements 4. Emission Estimates for non-GHG Pollutants
Masco, M_0827	14. General Opposition 4. Emission Estimates for non-GHG Pollutants
Massie, D_0490	15. General Support
Mathews, H_0607	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related
Matz, E_0546	14. General Opposition 9. FEIS - Non-Air Related
Maust, J_0248	14. General Opposition
Maxwell, N_0855	1. Permitting Process 12. Tribal Consultation 14. General Opposition 6. Construction Status

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Mayers, M_0293	14. General Opposition
McArthur, M_0496	15. General Support
McClain, K_0110	13. Tribal Lands 14. General Opposition
McClay, S_0360	14. General Opposition
McCloud, D_0049	12. Tribal Consultation 13. Tribal Lands 14. General Opposition
McCluskey, S_0208	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
McCollough, T_0482	15. General Support
McFarlane, B_0051	10. Alternatives to the Project 14. General Opposition
McGee, D_0299	14. General Opposition
McGrath, A_0134	14. General Opposition
McGrath, J_0111	14. General Opposition
McInturff, D_0350	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
McKinlay, B_0251	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
McKnight, H_0313	14. General Opposition
McKole, L_0052	14. General Opposition
McMahon, J_0788	14. General Opposition
McPherson, W_0368	14. General Opposition
McVaugh, S_0378	14. General Opposition
Medicine, E_0053	14. General Opposition
Medicine, E_0729	12. Tribal Consultation 14. General Opposition
Meechan, A_0405	15. General Support
Megrath, J_0439	15. General Support
Mehas, P_0099	12. Tribal Consultation 14. General Opposition
Merritt, J_0819	14. General Opposition
Metzger, P_0330	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Meziere, Y_0207	13. Tribal Lands 14. General Opposition 9. FEIS - Non-Air Related
Michel, M_0677	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition
Mickelson, M_0179	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions
Miles, J_0165	14. General Opposition
Miller, B_0382	13. Tribal Lands 14. General Opposition 9. FEIS - Non-Air Related
Miller, G_0121	14. General Opposition
Mills, D_0753	15. General Support
Milton, M_0400	15. General Support
Minnow, J_0722	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Mitchell, A_0114	14. General Opposition
Mitchell, G_0887	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 9. FEIS - Non-Air Related
Monma, M_0587	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions
Moore, B_0752	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Moore, D_0728	14. General Opposition
Moore, K_0326	12. Tribal Consultation 14. General Opposition
Moore, R_0488	15. General Support
Mora-Villalpondo, M_0717	14. General Opposition 6. Construction Status 9. FEIS - Non-Air Related
Morelli, P_0390	15. General Support
Morelli, P_0391	15. General Support
Morelli, P_0453	15. General Support
Morris PhD, A_0659	13. Tribal Lands 14. General Opposition 8. End Use
Morrison, R_0797	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	9. FEIS - Non-Air Related
Morrison, R_0054	11. Opinions of Other Public Officials 4. Emission Estimates for non-GHG Pollutants 6. Construction Status 8. End Use 9. FEIS - Non-Air Related
Muir, G_0055	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Mullen, O_0669	1. Permitting Process 10. Alternatives to the Project 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Mullin, B_0056	15. General Support
Murphy, A_0222	14. General Opposition
Murphy, C_0835	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 8. End Use
Murray, M_0057	14. General Opposition
Myers, T_0667	7. FSEIS Factors, Methods, and Conclusions
Nagy, M_0398	15. General Support
Naidus, B_0321	14. General Opposition
Naidus, B_0794	14. General Opposition
Narloch, D_0444	15. General Support
Neal, M_0766	15. General Support
Nebel, V_0857	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 9. FEIS - Non-Air Related
Nelson, J_0523	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 8. End Use 9. FEIS - Non-Air Related
Nelson, J_0090	14. General Opposition
Nelson-Zagar, T_0210	14. General Opposition
Nesh, N_0287	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition
Newton, E_0681	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Ng, P_0716	10. Alternatives to the Project 14. General Opposition
Nicholson, J_0184	14. General Opposition
Nielsen, R_0058	14. General Opposition 8. End Use 9. FEIS - Non-Air Related
Nielsen, R_0683	14. General Opposition 9. FEIS - Non-Air Related
Noel, J_0183	14. General Opposition
Norman, P_0300	14. General Opposition
Norris, W_0495	15. General Support
O'Connor, A_0192	14. General Opposition
Oaks, L_0793	14. General Opposition
Olin, G_0119	14. General Opposition
Olivier, C_0332	14. General Opposition
Olsen, J_0708	14. General Opposition 2. Permitting Requirements
Olson, K_0185	14. General Opposition
Oseen-Senda, K_0312	14. General Opposition 9. FEIS - Non-Air Related
Palmer, I_0164	14. General Opposition
Parelda, S_0801	14. General Opposition
Parks, S_0209	14. General Opposition
Pehoguin, J_0061	12. Tribal Consultation 14. General Opposition
Perkins, L_0475	15. General Support
Perkins, S_0616	1. Permitting Process 10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 8. End Use 9. FEIS - Non-Air Related
Petoud, D_0798	14. General Opposition 2. Permitting Requirements
Petrich, C_0751	15. General Support
Petrocci, A_0777	14. General Opposition 9. FEIS - Non-Air Related
Phillips, A_0062	14. General Opposition 2. Permitting Requirements

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Pielemeier, J_0433	15. General Support
Pierson, T_0810	15. General Support
Porter, S_0215	12. Tribal Consultation 13. Tribal Lands 14. General Opposition
Powell, L_0187	14. General Opposition
Pravitz, K_0434	15. General Support
Prescott, D_0123	14. General Opposition
Presutti, M_0316	14. General Opposition
Price, H_0697	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Price, L_0194	14. General Opposition
Pritchard, M_0526	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Pritchard, R_0128	14. General Opposition
Puzon, P_0404	15. General Support
Quick, C_0186	14. General Opposition
Radtke, J_0274	14. General Opposition
Rakowsky, T_0395	15. General Support
Ramel, A_0769	14. General Opposition
Ramirez, A_0548	12. Tribal Consultation 14. General Opposition
Ramirez, N_0785	14. General Opposition
Ramirez, N_0872	11. Opinions of Other Public Officials 12. Tribal Consultation 9. FEIS - Non-Air Related
Ranes, E_0764	14. General Opposition
Rassum, F_0888	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 9. FEIS - Non-Air Related
Ravard-Andresen, Y_0138	14. General Opposition
Ray, M_0204	14. General Opposition
Reetz, N_0705	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Reines, E_0158	12. Tribal Consultation

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	14. General Opposition
Reines, L_0154	14. General Opposition
Reinhart, R_0064	14. General Opposition 9. FEIS - Non-Air Related
Remagen, D_0314	12. Tribal Consultation 14. General Opposition
Rempe, D_0423	15. General Support
Retallick, M_0438	15. General Support
Retallick, M_0448	15. General Support
Rexroat, K_0181	14. General Opposition
Reyna, F_0401	15. General Support
Reynon, T_0718	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 6. Construction Status
Rideout, J_0734	12. Tribal Consultation 14. General Opposition 2. Permitting Requirements
Riedener, C_0678	14. General Opposition 6. Construction Status
Riedener, C_0837	14. General Opposition 2. Permitting Requirements 4. Emission Estimates for non-GHG Pollutants
Riedener, C_0838	14. General Opposition 4. Emission Estimates for non-GHG Pollutants
Riedener, C_0839	1. Permitting Process 14. General Opposition 3. Permit Conditions 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Riedener, C_0840	1. Permitting Process 14. General Opposition 3. Permit Conditions 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Riedner, C_0566	14. General Opposition
Riedner, C_0621	12. Tribal Consultation 14. General Opposition 2. Permitting Requirements
Riedner, C_0622	14. General Opposition 2. Permitting Requirements
Riedner, C_0623	1. Permitting Process 12. Tribal Consultation 14. General Opposition 2. Permitting Requirements 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions
Riedner, C_0624	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	2. Permitting Requirements
Riley, B_0618	14. General Opposition
Rixon, J_0336	14. General Opposition
Robertson, L_0555	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Robinson, B_0066	10. Alternatives to the Project 14. General Opposition 9. FEIS - Non-Air Related
Rolf, M_0527	14. General Opposition
Rollosson Halbhuber, A_0226	14. General Opposition
Romano, A_0304	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Roselander, N_0370	14. General Opposition 9. FEIS - Non-Air Related
Rowe, P_0661	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Royce, K_0148	14. General Opposition
Royce, K_0149	14. General Opposition
Rubicz, S_0735	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Rudnick, D_0619	1. Permitting Process 12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Rupert, M_0583	1. Permitting Process 11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 6. Construction Status
Ruthven, S_0130	14. General Opposition
Ruud, J_0726	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition
Ryan, S_0627	14. General Opposition
Rye, C_0748	15. General Support
Sachs, S_0529	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 2. Permitting Requirements

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Sagen, C_0196	14. General Opposition
Saluskin, D_0720	14. General Opposition
Sanders, H_0818	12. Tribal Consultation 14. General Opposition
Saunders, B_0501	15. General Support
Savishinsky, M_0773	14. General Opposition
Schaefer, R_0150	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Schiaffino, A_0263	14. General Opposition
Schofield, A_0361	14. General Opposition
Schorr, C_0269	14. General Opposition
Schrappen, P_0750	15. General Support
Schuster, L_0547	14. General Opposition
Sciortino, C_0067	12. Tribal Consultation 13. Tribal Lands 14. General Opposition
Sciortino, C_0069	13. Tribal Lands 14. General Opposition
Scitern, J_0234	14. General Opposition
Sears, S_0094	14. General Opposition
Sell, D_0464	15. General Support
Serres, D_0690	14. General Opposition
Seward, M_0641	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related
Shaughnessy, D_0786	14. General Opposition
Shinabarger, R_0649	12. Tribal Consultation 14. General Opposition 6. Construction Status 9. FEIS - Non-Air Related
Shoemake, G_0318	12. Tribal Consultation 14. General Opposition
Shureb, L_0640	14. General Opposition
Sinclair, R_0135	14. General Opposition
Slind, T_0265	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Small, T_0363	12. Tribal Consultation 14. General Opposition
Smethers, K_0289	14. General Opposition
Smith, C_0161	14. General Opposition
Smith, J_0203	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Smith, J_0776	14. General Opposition
Smith, J_0834	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related
Smith, M_0791	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Smith, M_0858	14. General Opposition
Smith (CRED), M_0140	14. General Opposition
Snow, M_0502	15. General Support
Snyder, D_0403	15. General Support
Sommers, L_0476	15. General Support
Sonoquie, M_0107	14. General Opposition
Sosin, M_0091	14. General Opposition
Sosin, M_0510	11. Opinions of Other Public Officials 12. Tribal Consultation 14. General Opposition 6. Construction Status
Spadoni, J_0435	15. General Support
Spivey, B_0093	14. General Opposition 9. FEIS - Non-Air Related
Sposato, K_0532	10. Alternatives to the Project 14. General Opposition 16. Other State or Federal Laws Not Discussedin Permit
Square, C_0571	12. Tribal Consultation 14. General Opposition
Stampfer, R_0092	14. General Opposition
Stanton, C_0160	14. General Opposition
Staples-Stumvoll, M_0113	14. General Opposition
Starbuck, B_0250	11. Opinions of Other Public Officials

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	12. Tribal Consultation 14. General Opposition
Steckler, B_0380	14. General Opposition
Steele, A_0315	14. General Opposition
Steffen, M_0070 Steffen Construction, Inc.	15. General Support
Steffen, M_0477	15. General Support
Steinke, A_0684	14. General Opposition
Steinke, D_0071	10. Alternatives to the Project 14. General Opposition 16. Other State or Federal Laws Not Discussed in Permit 2. Permitting Requirements 9. FEIS - Non-Air Related
Steinke, D_0508	14. General Opposition 9. FEIS - Non-Air Related
Steinke, D_0556	14. General Opposition 2. Permitting Requirements
Steinke, D_0573	14. General Opposition 8. End Use
Steinke, D_0652	14. General Opposition 9. FEIS - Non-Air Related
Steinke, D_0655	14. General Opposition 8. End Use
Steinke, D_0656	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 16. Other State or Federal Laws Not Discussed in Permit 8. End Use 9. FEIS - Non-Air Related
Steinke, D_0660	12. Tribal Consultation 14. General Opposition
Steinke, D_0673	14. General Opposition 9. FEIS - Non-Air Related
Steinke, D_0789	14. General Opposition
Steinke, D_0871	1. Permitting Process 10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 16. Other State or Federal Laws Not Discussed in Permit 2. Permitting Requirements 9. FEIS - Non-Air Related
Stern, H_0670	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Stern, H_0691	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Sterud, B_0744	14. General Opposition 9. FEIS - Non-Air Related
Stewart, J_0283	1. Permitting Process 14. General Opposition 5. SEPA Documents - Air Related

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Stocker, K_0351	12. Tribal Consultation 14. General Opposition
Stocks, J_0199	14. General Opposition
Stoker-Graham, C_0580	12. Tribal Consultation 14. General Opposition
Stone, J_0666	14. General Opposition
Stonington, L_0554	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Storms, S_0511	10. Alternatives to the Project 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Storms, S_0512	11. Opinions of Other Public Officials 14. General Opposition 16. Other State or Federal Laws Not Discussedin Permit 7. FSEIS Factors, Methods, and Conclusions
Storms, S_0513	1. Permitting Process 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Storms, S_0514	14. General Opposition 6. Construction Status
Storms, S_0515	1. Permitting Process 14. General Opposition 5. SEPA Documents - Air Related
Storms, S_0516	12. Tribal Consultation 13. Tribal Lands 14. General Opposition
Storms, S_0517	14. General Opposition 8. End Use
Storms, S_0518	1. Permitting Process 14. General Opposition 5. SEPA Documents - Air Related
Storms, S_0634	14. General Opposition 4. Emission Estimates for non-GHG Pollutants
Storms, S_0635	1. Permitting Process 14. General Opposition
Storms, S_0636	10. Alternatives to the Project 14. General Opposition
Storms, S_0687	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Strauss, S_0654	13. Tribal Lands 14. General Opposition
Strider, D_0754	12. Tribal Consultation 14. General Opposition
Stril, P_0442	15. General Support
Strivens, K_0371	14. General Opposition 9. FEIS - Non-Air Related
Strobel, A_0072	14. General Opposition
Studley, L_0657	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	7. FSEIS Factors, Methods, and Conclusions
Sullivan, T_0345	14. General Opposition
Sutton, M_0170	14. General Opposition
Swenson, S_0707	15. General Support
Syfers, M_0530	1. Permitting Process 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Syfers, M_0765	14. General Opposition
Syverson, L_0562	14. General Opposition 6. Construction Status 9. FEIS - Non-Air Related
T, L_0243	15. General Support
Takutan, T_0592	14. General Opposition
Taruc, M_0543	12. Tribal Consultation 14. General Opposition 2. Permitting Requirements 7. FSEIS Factors, Methods, and Conclusions
Taylor, M_0710	10. Alternatives to the Project 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Taylor, S_0286	12. Tribal Consultation 14. General Opposition 8. End Use
Thain, D_0500	15. General Support
Thain, L_0474	15. General Support
Thompson, B_0638	14. General Opposition 8. End Use 5. SEPA Documents - Air Related
Thompson, B_0811	14. General Opposition
Thompson, J_0073	12. Tribal Consultation 14. General Opposition 6. Construction Status
Thompson, S_0074	14. General Opposition
Thorne, R_0484	15. General Support
Tompkins, J_0682	14. General Opposition 9. FEIS - Non-Air Related
Tornow, J_0308	1. Permitting Process 12. Tribal Consultation 13. Tribal Lands 14. General Opposition
Trecha, M_0843	14. General Opposition 4. Emission Estimates for non-GHG Pollutants
Trejo, C_0850	12. Tribal Consultation 13. Tribal Lands

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	14. General Opposition 2. Permitting Requirements 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions
Tripoli, V_0374	12. Tribal Consultation 14. General Opposition
Troeh, L_0443	15. General Support
Tschop, C_0264	14. General Opposition
Tucker, L_0642	12. Tribal Consultation 14. General Opposition 6. Construction Status
Turner, F_0524	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 4. Emission Estimates for non-GHG Pollutants 8. End Use 9. FEIS - Non-Air Related
Turner, MD, A_0663	12. Tribal Consultation 14. General Opposition 4. Emission Estimates for non-GHG Pollutants 7. FSEIS Factors, Methods, and Conclusions
Twidt, B_0440	15. General Support
Twyman, M_0076	12. Tribal Consultation 13. Tribal Lands 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 8. End Use 9. FEIS - Non-Air Related
Umbehocker, C_0276	14. General Opposition 9. FEIS - Non-Air Related
Urbaite, D_0253	1. Permitting Process
Utigard, C_0077	14. General Opposition
Utigard, C_0745	14. General Opposition
Valdez, C_0780	12. Tribal Consultation 14. General Opposition
Valenzuela, K_0301	12. Tribal Consultation 14. General Opposition 8. End Use
Van Biene, M_0303	14. General Opposition
Vann, D_0142	14. General Opposition
Vaughan, K_0365	12. Tribal Consultation 14. General Opposition
Voget, R_0702	14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions
Voie, K_0884	15. General Support

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
von Christierson, P_0557	14. General Opposition
Vossler, M_0247	13. Tribal Lands 14. General Opposition
Wagner, P_0757	14. General Opposition
Walker, B_0100	14. General Opposition
Walker, I_0223	1. Permitting Process 12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 9. FEIS - Non-Air Related
Walker, J_0396	15. General Support
Walkup, D_0756	10. Alternatives to the Project 14. General Opposition
Wallace, C_0431	15. General Support
Wallach, J_0079	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Wallach, J_0813	14. General Opposition
Walters, M_0463	15. General Support
Walters, N_0377	12. Tribal Consultation
Walters, N_0774	14. General Opposition 6. Construction Status 9. FEIS - Non-Air Related
Ward, M_0080	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Ward, M_0565	1. Permitting Process
Warren, A_0081	14. General Opposition 8. End Use 9. FEIS - Non-Air Related
Warren, A_0574	14. General Opposition
Wasserman, L_0082	14. General Opposition
Watson, A_0417	15. General Support
Way, J_0083	12. Tribal Consultation 14. General Opposition
Way, S_0701	12. Tribal Consultation 14. General Opposition
Webb, J_0224	14. General Opposition
Weiker, W_0450	15. General Support
Wells, M_0747	15. General Support
Wend, D_0214	14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
Westerfield, S_0106	14. General Opposition
Wetzel, D_0367	10. Alternatives to the Project 12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Whisman, M_0775	15. General Support
White, J_0577	14. General Opposition
White, R_0637	12. Tribal Consultation 14. General Opposition
Wichar, D_0084	14. General Opposition
Widner, B_0588	12. Tribal Consultation 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions
Wiegand, P_0427	15. General Support
Wiegman, T_0614	10. Alternatives to the Project 13. Tribal Lands 14. General Opposition
Wiegman, T_0804	14. General Opposition
Williams, I_0759	14. General Opposition
Williams, J_0569	14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Williams, J_0806	14. General Opposition
Williams, M_0713	12. Tribal Consultation 14. General Opposition 16. Other State or Federal Laws Not Discussedin Permit 8. End Use 9. FEIS - Non-Air Related
Williams, R_0085	14. General Opposition
Williamson, B_0625	1. Permitting Process 12. Tribal Consultation 13. Tribal Lands 14. General Opposition 2. Permitting Requirements 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions
Wilson, T_0155	14. General Opposition
Wiseman-Kuhlman, T_0613	14. General Opposition 2. Permitting Requirements 3(a). Suggested Permit Conditions
Wood, K_0700	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions
Wood, M_0171	12. Tribal Consultation

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	13. Tribal Lands 14. General Opposition 8. End Use
Woodruff, L_0333	14. General Opposition
Wooters, D_0133	14. General Opposition
Wright, D_0173	12. Tribal Consultation 14. General Opposition
Wright Owner, J_0617	12. Tribal Consultation 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions
Wyckoff, K_0572	14. General Opposition
Zane, L_0188	14. General Opposition
Zeller, G_0420	15. General Support
Zender, K_0086	15. General Support
Zimmerle, J_0790	12. Tribal Consultation 14. General Opposition 9. FEIS - Non-Air Related
Form Email 1_0868	12. Tribal Consultation 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions
Form Email 2_0869	12. Tribal Consultation 14. General Opposition 2. Permitting Requirements 7. FSEIS Factors, Methods, and Conclusions
Form Email 3_0860	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Form Email 4_0861	1. Permitting Process 12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Form Email 5_0862	1. Permitting Process 12. Tribal Consultation 14. General Opposition
Form Email 6_0863	12. Tribal Consultation 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Form Email 7_0864	12. Tribal Consultation 14. General Opposition 5. SEPA Documents - Air Related 7. FSEIS Factors, Methods, and Conclusions
Form Email 8_0865	14. General Opposition 3(a). Suggested Permit Conditions
Form Email 9_0866	12. Tribal Consultation 14. General Opposition

Table A.3-1 Comment Summary Table

Commenter/Number	Response Code/Title
	7. FSEIS Factors, Methods, and Conclusions 8. End Use
Form Email 10_0867	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 8. End Use
Form Letter 1_0875	1. Permitting Process 12. Tribal Consultation 13. Tribal Lands 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 8. End Use 9. FEIS - Non-Air Related
Form Letter 2_0876	15. General Support
Form Letter 3_0877	1. Permitting Process 12. Tribal Consultation 14. General Opposition 6. Construction Status 7. FSEIS Factors, Methods, and Conclusions 8. End Use 9. FEIS - Non-Air Related
Form Letter 4_0878	15. General Support
Form Letter 5_0879	14. General Opposition
Form Letter 6_0880	15. General Support
Form Letter 8_0881	15. General Support
Form Letter 9_0882	12. Tribal Consultation 14. General Opposition 7. FSEIS Factors, Methods, and Conclusions 8. End Use 9. FEIS - Non-Air Related
Form Letter 10_0883	15. General Support
Petition 1 – Sierra Club	Responses 1 - 17
Petition 2 – Sierra Club	Responses 1 - 17
Petition 3 – Redefine Tacoma	Responses 1 - 17