



December 17, 2021

Nancy Swofford, Permit Coordinator
Oregon Dept. of Environmental Quality
Eastern Region
475 NE Bellevue Dr., Suite 110
Bend, OR 97701

Submitted via email to: swofford.nancy@deq.state.or.us

Re: Public Comments on Proposed Air Contaminant Discharge Permit No. 25-0016-ST-02 for Portland General Electric’s Carty Generating Station

Dear Ms. Swofford,

On behalf of 15 environmental and community-based organizations from across the region, we are writing to urge you to reject PGE's request for a permit modification to increase harmful emissions at the Carty Generating Plant, located in the Columbia River Gorge National Scenic Area near Boardman, Oregon.

We are deeply concerned by the proposed permit modification. The Carty Plant is the source of a number of harmful, toxic pollutants, including nitrogen oxide, sulfur dioxide, formaldehyde, toluene, and particulate matter, among others. Of serious concern for this permit modification request from PGE are carbon monoxide (CO) (300% proposed increase) and volatile organic compounds (VOCs) (800% proposed increase)—both of which have serious health and environmental impacts. The proposed pollution increases would affect air quality in the Columbia River Gorge National Scenic Area, which already experiences haze and other air quality problems.

VOCs are a precursor to low-level ozone formation (smog). VOCs combine with NOx and sunlight to produce low-level ozone. PGE proposes to increase pollution in an area where DEQ frequently issues air stagnation advisories and alerts.¹ Low-level ozone is a powerful respiratory irritant.² When ozone spikes on hot summer days, emergency room visits and hospital admissions also rise for respiratory issues including asthma exacerbation and increased severity of chronic obstructive pulmonary disease (COPD) symptoms.³ Ozone events could be triggered by the release of large amounts of VOCs during a period when sunlight is strong. The addition of a major VOC source will make these impacts more likely.

This is not the first time communities have expressed concern about the specific impacts of this proposed permit modification or the impacts of Carty generally. When this permit modification was first proposed in 2018, numerous environmental and community-based organizations submitted detailed comments to DEQ addressing our concerns about PGE's proposed emissions increases as well as PGE's BACT determinations. Tribal governments, including the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), also expressed significant concerns over the proposed permit modification. Despite the considerable effort these groups spent preparing those comments, they were largely (or completely) ignored—and here we are again, three years later, being asked to comment on a proposed permit modification that appears to present virtually identical threats to the one that was proposed three years ago.

¹ Oregon DEQ, Air Pollution Advisories, <https://www.oregon.gov/deq/air/Pages/Air-Pollution-Advisories.aspx> Gray Season is Here - Air Stagnation Advisory In Effect Through Saturday, NBC Right Now (Dec. 1, 2020), https://www.nbcrightnow.com/gray-season-is-here---air-stagnation-advisory-in-effect-through-saturday/article_9345c67a-3429-11eb-a449-37c3eeb2f3f1.html

² U.S. EPA. 2016.

<https://www.epa.gov/ozone-pollution-and-your-patients-health/health-effects-ozone-generalpopulation>

³ Hansel NN, McCormack MC, Kim V. The Effects of Air Pollution and Temperature on COPD. *COPD*. 2016;13(3):372-379. doi:10.3109/15412555.2015.1089846

Since Carty was initially approved, multiple studies have demonstrated the cradle-to-grave climate change impacts of fracked gas. Specifically, methane released into the atmosphere during the production and transport of fracked gas is a far greater contributor to climate change than previously understood.⁴ Negative health impacts associated with fracked gas—from extraction, through transport, to combustion—disproportionately burden frontline communities.⁵ PGE’s pollution from Carty is a serious environmental justice issue unfairly impacting low-income, minority, and Tribal communities the hardest.

Underlying and magnifying each of these risks to ecosystems and public health is the reality of the climate crisis we are facing. The proposed emissions increase would create an additional burden in the Columbia River Gorge National Scenic Area—a cost our airshed, our health, and our planet cannot afford. In the midst of a climate emergency, we must focus on reducing—not increasing—emissions.

In June 2021, Oregon passed House Bill 2021, which sets one of the nation’s most ambitious goals for reducing greenhouse gas emissions from the electricity sector. PGE is now faced with the work of eliminating greenhouse gas emissions from its electricity by 2040, and has committed to tripling its use of clean energy by 2030. It is critical that we take aggressive action to reduce emissions from fossil fuels as we work to quickly transition to a decarbonized energy system. In line with HB2021, DEQ is in a position to ensure our shared goal of reducing emissions is reached by denying the permit modification and ensuring limits on dangerous emissions from Carty Gas Plant.

For the reasons described above, we urge you to deny PGE’s current request for a permit modification for the Carty Generating Station. Our communities and our climate demand better.

Thank you in advance for considering our input on this important public health and environmental issue.

⁴ See Steven Mufson, *Methane Leaks Offset Much of the Benefits of Natural Gas, Study Says*, Wash. Post, June 24, 2018, https://www.washingtonpost.com/business/economy/methane-leaks-offset-much-of-the-benefits-of-natural-gas-new-study-says/2018/06/21/e381654a-7590-11e8-b4b7-308400242c2e_story.html, see also Alvarez, et al., *Assessment of methane emissions from the U.S. oil and gas supply chain*, Science (2018), available at <https://science.sciencemag.org/content/361/6398/186?rss=1>; Sierra Club, *Fracked Gas: Nothing “Natural” About It* (2018) (reviewing literature and estimating leakage rate of 3 percent), available at https://www.sierraclub.org/sites/www.sierraclub.org/files/blog/FACTSHEET_FrackedGasClimateImpacts.pdf

⁵ Concerned Health Professionals of New York, & Physicians for Social Responsibility. (2020, December). Compendium of scientific, medical, and media findings demonstrating risks and harms of fracking (unconventional gas and oil extraction) (7th ed.). <http://concernedhealthny.org/compendium/>

Sincerely,

Kate Murphy, Community Organizer, Columbia Riverkeeper

Allie Rosenbluth, Campaigns Director, Rogue Climate

Dineen O'Rourke, Campaign Manager, 350PDX

David De La Torre, Healthy Climate Program Director, Oregon Physicians for Social Responsibility

Priya Choezom, Coalition Coordinator, Power Past Fracked Gas

Simone Crowe, Oregon Green New Deal Policy Organizer, Oregon Just Transition Alliance

Denise Lopez, Conservation Organizer, Friends of the Columbia Gorge

Debra Higbee-Sudyka, Chair, Conservation Committee, Oregon Chapter Sierra Club

Cathryn Chudy, Board Director & Lloyd Marbet, Executive Director, Oregon Conservancy Foundation

Sally Keely, Lead Team Member, No Methanol 360; and Owner, Cascadia Climate Action Now

Meg Ward, Co-Founder & Director of Communications, Breach

Bonnie McKinlay, Core Team Member, CedarAction

Mamelang Memela, Organizing Coordinator, Braider River Campaign

Dave Hale, Treasurer, Lower Columbia Stewardship Community