



**Washington County Unit, League of Women Voters  
of Oregon  
League of Women Voters of Portland**

Date: March 5, 2024

To: Oregon Department of Environmental Quality

From: Washington County Unit of the League of Women Voters of Oregon,  
Kathleen Hersh, Co-Chair  
League of Women Voters of Portland,  
Carolyn Buppert, President

Re: Intel Air Quality Permit Modification Public Comment

The Washington County Unit of the League of Women Voters of Oregon and League of Women Voters of Portland believe that

*Natural resources should be managed as interrelated parts of life-supporting ecosystems. Resources should be conserved and protected to assure their future availability. Pollution of these resources should be controlled in order to preserve the physical, chemical, and biological integrity of ecosystems and to protect public health.* (League of Women Voters of the United States)

Intel's air quality permit modification raises serious concerns about the health, environmental, and climate impacts that will result from an expanded plant's increased pollution. The expansion will result in sharp increases in harmful air pollutants, including particulate matter, and a doubling of greenhouse gas emissions. Clearly, this will lead to adverse health effects, including preventable deaths, and exacerbate the climate crisis.

The most concerning aspect of the permit application is that it will allow Intel to emit 27 more tons of particulate matter a year.

"Scientific evidence shows that long- and short-term exposures to PM<sub>2.5</sub> can harm people's health, leading to heart attacks, asthma attacks, and premature death."

(<https://www.epa.gov/system/files/documents/2024-02/pm-naaqs-overview.pdf>)

The National Institute of Environmental Health Sciences reports "A subset of PM, fine particulate matter (PM<sub>2.5</sub>) is 30 times thinner than a human hair. It can be inhaled deeply into lung tissue and contribute to serious health problems. PM<sub>2.5</sub> accounts for [most health effects](#) due to air pollution in the U.S. (<https://www.niehs.nih.gov/health/topics/agents/air-pollution>)

### **Washington County Concerns**

In an effort to protect the health of county residents and meet EPA standards, Washington County Department of Health and Human Services and the Office of Community Development developed a

League of Women Voters:  
*To promote political responsibility through informed and active participation in government.*

Wood Stove exchange program in 2016. Oregon Department of Environmental Quality (DEQ) determined that a major source of particulate matter in the air was older, uncertified wood stoves. The program assisted households in replacing older wood stoves and provided education on efficient methods of burning wood for heat. The program's six-year report issued in 2022 estimated that the program had reduced the amount of particulate matter (PM2.5 and PM10) by 46 tons over **six** years and had kept the county on target to meet EPA standards. The program received financial assistance from the State of Oregon, the city of Hillsboro, and Intel.

If Intel emits the maximum allowed by the requested permit, it would severely undermine the progress made by the Wood Stove Program.

## **Portland Concerns**

The Portland area, about 25 miles east of the Hillsboro/Aloha area, also experiences air quality issues with fine particulate matter PM2.5 and other emissions from the following sources: cars and trucks encircling I-5, I-205, I-405 interstates and other major roads; heavy diesel train traffic and yards within Portland; diesel Tri-Met buses; and the long airplane descents into our international airport. The Portland area also has many other industries contributing to air pollution, with the greatest polluter being the Owens-Brockway Glass Container plant. Additional pollution from expanded Intel facilities will increase harmful emissions.

## **Questions for DEQ to consider when evaluating Intel's application:**

- How does DEQ plan to oversee Intel's monitoring of its emissions?
- How will DEQ keep the public informed?
- Will DEQ require Intel to update its emission control equipment as new technologies emerge going forward?
- Has anyone made an estimate of whether the new permit's levels of emissions would impact Washington County's ability to meet the new annual PM2.5 standards of 9 micrograms per square meter?
- Does Intel have the ability to shut down particulate matter emissions during air quality emergencies such as temperature inversions and wildfire smoke inundations?
- On Feb. 7, 2024, the EPA issued a new standard for annual PM2.5 emissions from 12.0 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) to 9.0  $\mu\text{g}/\text{m}^3$ , based on scientific evidence that shows the current standard does not protect public health with an adequate margin of safety, as required by the Clean Air Act (CAA). Does this mean states have up until 2032 for attainment of this new standard? Does it mean that Intel can work under the old standard to build their new plants; or are they required to build them beginning now under the new standards?
- How should Oregon balance the need to protect human health, the environment, and the planet with plans to manufacture more chips in Oregon?

Thank you for considering our comments and questions.