

January 4th, 2021

Northwest Region AQ Permit Coordinator

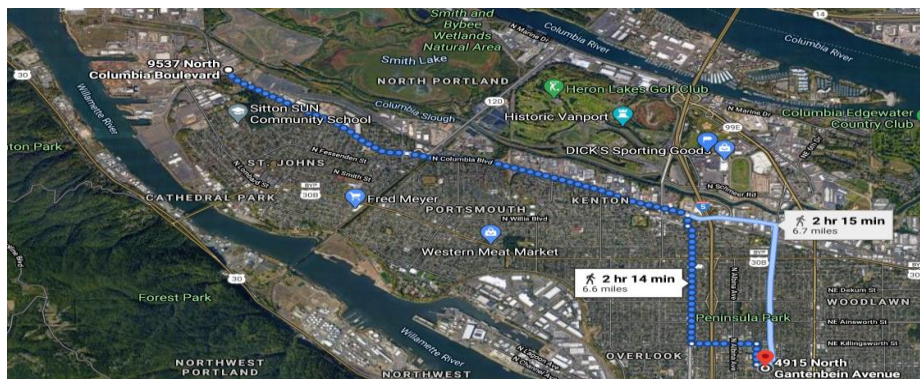
Department of Environmental Quality (DEQ)
700 NE Multnomah St., Ste. 600
Portland, OR 97232

Re: Proposed Air Quality Permit, NW Metals

The St. Johns Neighborhood Association (SJNA) has learned of the air quality permit request by NW Metals to operate a diesel-powered shredder at 9537 N. Columbia Blvd. At our general membership meeting on December 14, 2020, a motion was made and unanimously passed opposing the air quality permit's approval for NW Metals at this site for the following reasons:

- 1) NW Metals' history of operations at their former site on NE Killingsworth St. includes a five-alarm fire and over two and a half years of a drawn-out cleanup process involving environmental violations and court orders, and the process there is still not over. One need look no further than your site to see the history, all outlined at “Portland Scrap Yard Fire - NW Metals” (<https://www.oregon.gov/deq/aq/cao/Pages/nwmetals.aspx>).
- 2) The majority of the residents that live within a quarter-mile of this site are predominantly low-income, people-of-color, and their health and economic vitality will be severely harmed by living close to this site. We feel that this in turn will lead to more entrenched social and economic inequity in this community.
- 3) Additionally, the nearest air monitoring station was given as that at Humboldt School, at 4915 N Gantenbein Avenue, which is miles from the proposed site, and indeed from all the pollution sources in the St. Johns neighborhood. Furthermore, the retirement living center Harvest Homes, 6921 N Roberts Ave, was not considered. DEQ representatives responded to a question that admitting the permit process does not consider the full effect of all emissions from all industrial sources on nearby workplaces, schools, and homes.

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The process was initially rushed, with little engagement or outreach to the community. With less than a month to the deadline for submitting comments, not knowing where the schools and retirement centers are is a big miss on DEQ. NW Metals has a record of noncompliance, produced a fire that destroyed nearby homes and caused a partial evacuation of the Cully neighborhood. It has engaged in obstruction and dragged their feet for two and a half years since their fire. It should not be eligible to continue doing business with sites left uncleaned and seemingly no sense of accountability and responsibility.

We urge DEQ to reject this permit, and we urge DEQ to increase outreach mainly to often overlooked communities, including people of color and low incomes communities.

Sincerely,

SJNA Board

Jose Alamilla – Chair

Michelle Brinning – Land Use Chair