

CAFA NOW NEWSLETTER #1

January, 2022

Greetings to all CAFA NOW members as well as those of you who signed up on cafanow.com to receive our newsletters. **[Note: Our website crashed and is being rebuilt from scratch.]** This is the first of what we expect will be many efforts to communicate with you about what is happening at Intel New Mexico. CAFA NOW was formed in response to Intel's recently announced \$3.5 billion new investment in the Rio Rancho facility. The company is planning to retool the plant and substantially increase operations as it begins to produce its latest iteration of computer chips.

For more than three decades, residents living near the Intel New Mexico plant have been victimized by its toxic chemical emissions. As Intel prepares to expand its operations, we are very concerned that levels of toxic emissions, already unacceptable and unsafe, will increase exponentially. No exposures to any levels of toxic chemicals are safe, and continuous exposures to even low levels of these chemicals are a threat to the health of all who have to breath them every day.

What We Have Asked of Intel

Intel is an impressive and important company, and the products that Intel produces are vital to both the economy and national security of the United States. Clean Air for All Now, recognizes what a significant contribution Intel New Mexico makes to our local and state economies, and we wish the company success in all its endeavors. Nevertheless, we are compelled to express our concerns about their continuous toxic air emissions. The plant

operates 24/7/365. Those emissions will likely increase substantially, once the production of its new generation of chips begins. We have asked Intel to devote a small portion of its ongoing \$3.5 billion investment to (1) replace all its existing abatement equipment with the newest, most effective thermal oxidizers and scrubbers and (2) to purchase the necessary additional thermal oxidizers and scrubbers of the same highest quality and effectiveness. Intel's seven existing thermal oxidizers were installed between 10 and 13 years ago, and of its 27 scrubbers, 14 of them were installed between 19 and 26 years ago and the most recent installation was in 2009. Surely abatement equipment technology has advanced so that newer versions of this equipment are much more effective.

Intel's Response

On Wednesday, November 17 during a meeting of the Community Environmental Working Group, an Intel representative indicated that the company does not plan to apply for a new permit but will only propose some modifications to its existing permit. Further, Intel will not replace any of its outdated, existing abatement equipment and will only add some additional items that are already listed as "To Be Determined" in the existing permit. And finally, as a result, this individual says that no public notice or comment period and no public hearing will be required.

History of Intel's Relationship with Nearby Residents

The troubled history of Intel New Mexico's relationship with residents living near the Intel plant during the first 20 years of its existence (starting in 1985) and the failure of the New Mexico Environment Department (NMED) to protect the health of those

residents are well documented in a book by former Corrales resident Barbara Rockwell titled *Boiling Frogs: Intel vs. the Village*, available on Amazon. CAFA NOW has sent a copies of this book to key NMED staffers along with the suggestion that it should be required reading for all staff who deal with Intel's air emissions permits and permitting. During those first 20 years, many people became ill, others were forced by the terrible fumes to sell out and move, and some individuals died.

From 2005 to the present, Intel New Mexico's staffing and production declined gradually as corporate decision-makers assigned to other plants the challenges of producing new, smaller and evermore sophisticated chips. Nevertheless, production of older versions continued 24/7/365 and so too did toxic emissions, albeit at lower but still concerning levels.

When Intel raised its stacks to industry-standard heights in 2011, that served to broaden the geographic area impacted by their emissions. So those affected since the beginning continue to be exposed while many others now experience what they had only heard others describe.

What We Have Asked of the New Mexico Environment Department

As best we can tell, Intel's current permit is not enforceable. Why is it not enforceable? Because it allows Intel to have facility-wide allowable emissions for Nitrous Oxides (NO_x), Carbon Monoxide (CO), Volatile Organic Compound (VOCs), Sulfur Dioxide (SO₂), and dangerous particulates of 95.7, 94.7, 96.7, 95, and 95 tons per year respectively. Each of these numbers is conveniently just below the 100 ton per year limit that would require a major source permit. And for Hazardous Air

Pollutants (HAPs), the permit allows 24 tons per year, just below the 25 ton cut point for a major source permit. And yet, according to Intel's own public web site, their most recent emissions are nowhere near these amounts. For example, VOCs are at an annualized level of about 10.5 tons, NO_x is reported as about 30 tons and HAPs just over 3 tons. Thus, Intel has no motivation to keep emissions to an absolute minimum since they can increase them substantially at any time and still be in compliance with their permit.

We have asked the New Mexico Environment Department (NMED), to issue Intel a new air emissions permit that (1) requires replacement of all Intel's existing abatement equipment with new, up-to-date more effective versions, (2) adds frequent, independent monitoring and public reporting of emissions, and (3) establishes realistic and reasonable maximum levels of facility-wide emissions so that the permit is truly enforceable. Finally, we requested a public notice be published, a comment period be announced and a hearing scheduled where all these important issues can be discussed publicly. We are awaiting NMED's response.

The Risk-Benefit Principle Applied

A lot of what we do in everyday life poses some risk. A few obvious examples include driving a car, going for a walk, taking a prescription drug, or climbing up a ladder. In those and many other instances, either consciously or subconsciously, we assess the risk against the benefit and then decide what to do. In other words, we have a choice - we get to decide whether to take the risk or not. And usually, when the risk is low and the benefit substantial, we proceed. Now consider risk-benefit in relation to Intel and its toxic emissions. First, what are the benefits? What Intel does benefits nearly everyone either directly or indirectly.

What about the risks? For the vast majority of individuals in the Bernalillo-Sandoval County metro area, what Intel does poses little or no direct risk. But what about the 73,000 plus residents who live near the Intel plant? We shoulder ALL the risk. And the unfair and unjust thing about this is WE HAVE NO CHOICE. Intel should, on its own, do everything possible to limit exposure to its toxic emissions, and NMED should make certain that they do. On paper, 95% Destructive Removal Efficiency sounds good until we have to breathe the other 5%. After 35 years, enough is enough!

Cancer Studies

In December 2015, Corrales Residents for Clean Air and Water requested a study of cancer rates in the vicinity of the Intel plant. It was conducted by the New Mexico Tumor Registry, the State's comprehensive cancer registry, operated by UNM under contract to the New Mexico Department of Health. In New Mexico, by law, every kind of cancer is reportable to this registry. The study area included the 14 census tracts that abut or are near to the Intel New Mexico plant. The most important finding of the study is that myeloid/monocytic leukemia occurred in the study area at statistically significantly higher levels than would have been expected. This finding is of particular concern because myeloid leukemia as well as other blood cancers were found to occur among workers at Samsung chip manufacturing plants in Korea at substantially higher levels than expected.

The study report is posted on our website, cafanow.com, together with a critique by CAFA NOW co-chair Dennis O'Mara who had serious concerns about some of the content, the way the report was written, and the absence of detail about how certain statistical calculations were undertaken. As a result, a

second study is being done, also by the New Mexico Tumor Registry. The study area is the same but the time frame is expanded to include 9 additional years of data going back to 2000 and forward to 2019. Those results, which should reflect the concerns expressed to the original report's primary author, are expected to be available in early 2022.

Vegetation Study

A UNM professor is carrying out a study to examine the impact of Intel's emissions on vegetation in the area of the plant since the beginning of its construction in 1985. The study employs satellite imagery, GIS mapping and sophisticated software that can determine the health of the vegetation over time. Results are anticipated in the spring of 2022.

Conclusion

We have come to believe that Intel's management (and by extension, NMED staff) think it is perfectly fine for residents living near the Intel plant to be exposed to Intel's toxic emissions and to have to breathe them every day. We the members of Clean Air for All Now and many others in the area believe otherwise, and we are counting on NMED to change this dynamic and do what is right and necessary to protect the health and safety of all who are impacted.

We invite you to share any comments, concerns or questions at cafanow@gmail.com . Please forward this newsletter to family, friends and anyone you think might be interested in these issues and encourage them to visit our website and sign our petition.

Dennis J. O'Mara and Marcy Brandenburg
Co-Chairs, Clean Air for All NOW