

Washington Department of Ecology, Waste 2 Resources Program

Washington Department of Ecology Waste 2 Resources Program Comments on Draft Changes to WAC 173-400, General Regulations for Air Pollution Sources.

By definition, the proposed rule makes hog fuel a sub-category of "wood waste" which in turn is defined as a sub-category of solid waste. Hog fuel is most often managed as a commodity. W2R does not agree that hog fuel should be categorized as "solid waste". W2R recommends that "solid waste that consists of" be removed from the definition of "wood waste" to eliminate the presumption that all wood waste is solid waste. As written, the definition of "wood waste" suggests that units constructed to burn woody materials managed for fuel are automatically subject to the environmental impact statement requirement of RCW 70.95.700 and the operator certification requirements of RCW 70.95D.