

Comments from *Eric Steffensen*, Environmental Engineer, Boise Cascade Wood Products, LLC

WAC 173-400 rulemaking defines Hog Fuel as a solid waste based on the following definitions:

- 173-400-030(45) Hog Fuel is wood waste that's reduced in size to facilitate burning.
- 173-400-030(106) Wood-Waste is solid waste that consists of wood pieces or particles generated as a by-product or waste from the manufacturing of wood products, and the handling and storage of raw materials, trees, and stumps. This includes, but is not limited to, sawdust, chips, shavings, bark, pulp, and log sort yard waste, but does not include wood pieces or particles containing chemical preservatives such as creosote, pentachlorophenol, or copper-chrome-arsenate.

WAC 173-350 Solid Waste Handling Standards rulemaking has a formal public comment coming to an end on 3/20/2018 where they have removed the term hogged fuel from the definition of Wood Waste in WAC 173-350-100. Hog fuel will not be a wood waste nor a solid waste per draft rule WAC 173-350-021(3). Therefore, we support the comments being made today by the Northwest Pulp and Paper Association suggesting Ecology replace the terms hog fuel and wood waste with the following:

- "Biomass or bio-based solid fuel" is fuel that consists of wood pieces or particles generated as a by-product from the manufacturing of wood products, and the handling and storage of raw materials, trees, and stumps. This includes, but is not limited to, sawdust, chips, shavings, bark, pulp, log sort yard material, effluent treatment solids, and non-hazardous secondary materials used as fuel in a combustion unit as approved by the Environmental Protection Agency through provisions of 40 CFR 241.

If Ecology intends to retain the term hog fuel in this rule making, then to simplify and clean-up the draft WAC 173-400 definitions we propose the following:

- Definition 173-400-030(106) Wood Waste should be deleted and incorporated into the definition of Hog Fuel.
- Definition 173-400-030(45) Hog fuel should be changed to read: *Hog Fuel (a.k.a. Hogged Fuel or Wood Fuel) is a fuel that consists of wood pieces or particles generated as a by-product from the manufacturing of wood products, and the handling and storage of raw materials, trees, and stumps. This includes, but is not limited to, sawdust, chips, shavings, bark, pulp, and log sort yard material, but does not include wood pieces or particles containing chemical preservatives such as creosote, pentachlorophenol, or copper-chrome-arsenate.*

WAC 173-400-040(2)(e)(i)(B) requires a notification within two hours following an unplanned shutdown. The Excess Emission reporting requirements WAC 173-400-107 and 108 allows twelve hours to report excess emissions that are a potential threat to human health or safety, so unplanned shutdowns should not require a more stringent reporting requirement than 12 hours. Having similar reporting times that are consistent with other reporting requirements is less confusing for our operators. If 12 hours is acceptable when human health or safety is threatened, than it should also be adequate for an unplanned shutdown.

WAC 173-400-040(2)(e)(i) appears to be missing the phrase "Permitting authority is notified...". Without that verbiage, WAC 173-400-040(2)(e)(i) (A) and (B), do not make sense.

Replace "wood derived fuels" in WAC 173-400-050 (1) with "hog fuel". Wood derived fuels is only one component of hog fuel.