

# CPM DEVELOPMENT CORPORATION

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Thank you for the opportunity to comment. Based on the discussions in the workgroup sessions and the revised documents, CPM Development Corp. (CPM) has the following comments.

### General Rule Comments:

- As a participant of the workgroup, I am disappointed in the final outcome. While I support Ecology's efforts in seeking input from stakeholders, the process was disrupted several times with many changes in Ecology staff participating in the group. The process seemed to falter at that point. It was apparent that much of the previous information and discussions between Ecology and the workgroup did not carry over and time did not allow for more time to reestablish a solid working relationship between Ecology and the workgroup. After the last significant change in Ecology staff, there was one stakeholder holder meeting and one conference call, which due to technical difficulties, most of the workgroup participants were only able to listen and not able to provide input or ask questions. This final draft has significant changes that were not discussed with the workgroup or reflect workgroup input. CPM believes it would be beneficial for Ecology to reconvene the workgroup to have an opportunity to review and discuss these changes.
- Fees should remain in rule to protect the integrity of the program and registered sources. Ecology has not shared budget numbers to determine costs and CPM believes it is important that all parties have an opportunity to determine if the new fee structure is meeting Ecology's goals before allowing for automatic increases.
- Current Ecology Air Quality systems, databases and practices are archaic, time consuming and a burden for both the Dept. and regulated sources. There are likely many opportunities for cost savings to the program that Ecology needs to explore prior to implementing a near full cost recovery program with significant fee increases to many sources. (I.e. online reporting similar to Stormwater section, avoiding duplicate reporting, etc.)

### WAC 173-400 Comments:

- 173-400-102(1), 103(1)& 105(1) – These sections all refer to emission inventory and state that sources are to submit some sort of emission inventory report. However, each of these sections have different language as to what that report is or should include – “may”, “must”, “shall” include or submit. Ecology needs to correct the inconsistencies and clarify these sections.
- 173-400-102, 103 & 105 – All contain schedules for various activities in the registration process and all have varying schedules that are confusing and need clarification. It is unclear to the registered source as to what dates are required for each thing, the dates should be specifically outlined and not buried in lines of text. Furthermore, there is no date as to when the registration fee billing statement will be provided to the source.



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Concrete



Columbia  
Asphalt



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Columbia  
Ready Mix



Eugene Sand  
Construction



Eugene Sand  
& Gravel



Green & White  
Rock Products



Helena Sand  
& Gravel



ICON  
Materials



Inland Asphalt Co.



Interstate Concrete  
& Asphalt



River Bend  
Sand & Gravel



Salem Road  
& Driveway



Wenatchee Sand  
and Gravel

WAC 173-455 Comments:

- 173-455-040 (4) – Change from “workload analysis” to annual budget. What is the determination of the annual budget? The intent of the workload analysis method was to ensure that only program costs were being assess to the program and to provide detailed information regarding time and monies spent allowing for transparency of the fee process.
- 173-455-039 Table 1 and 040(3) Table 2 – CPM does not support the large gap of emissions in Tier 4 nor the large increase of fees from Tier 4 to 5. The workgroup was consistent in supporting less of a gap from 20-70 tons in Tier 4 and if necessary, adding an additional Tier. CPM asks Ecology to review Table 1 and Table 2 for a more equitable solution.

Thank you again for the opportunity to provide comments. Please feel free to contact me if you have any questions or need additional information.

Sincerely,

CPM DEVELOPMENT CORP.



Jana McDonald, PE  
Environmental Engineer