

## Alan Newman

In the process of updating the rule I have 2 suggestions to consider.

First is to re-institute the "T\_BACT by rule" that was removed in the last major revision to this rule. The T-BACT by rule approach simplified both determining T-BACT and easing permitting requirements for those sources covered in the rule. These were commercial and industrial processes that are common but also require a T-BACT determination. One suggestion would be a T-BACT determination for diesel generators similar to that currently found in WAC 173-400-930. The requirements for dry cleaners in WAC 173-400-075(8) and other toxic air pollutant oriented requirements in WAC 173-400 should be considered for moving since most if not all of these aren't in the SIP or have been approved as state plans for emission guidelines.

Second consider deleting from the TAPS list chemicals that are not allowed for US commerce or use such as DDT, Malathion, PCB, etc. Granted, some of these chemicals may still exist in the environment (like DDT and PCB in sediments and may be released as a result of Dangerous or toxic waste clean-ups). Some other processes to consider are certain surface coating operations, sandblasting operations using sodium bicarbonate or glass beads.