Annika Wallendahl

Thank you for the opportunity to comment on WAC 173-460 Controls for New Sources of Toxic Air Pollutants. I have two comments to provide.

1. It can be challenging for NOC air permit project proponents to identify the most current tBACT requirements for industrial processes/activities while in their capital planning phase - which typically happens up to a year before an NOC application is submitted. It would be beneficial if Ecology and the local air agencies could develop a consolidated central database of air pollution control technologies in the form of a state-wide tBACT clearinghouse, similar to the EPA's existing RBLC clearinghouse. In addition, this database would serve to standardize tBACT determinations across agencies. I would like to suggest the creation of a state-wide tBACT clearinghouse.

2. Over the course of attending NOC permit public hearings, I have observed that community members are often surprised to learn the extent of the air monitoring and reporting that facilities are required to do under their air permits. I believe this disconnect is partly due to the fact that air quality data reporting is not managed in Washington State through a centralized electronic reporting system, like Ecology's existing Permitting and Reporting Information System (PARIS) database system for Water Quality permits and DMRs. The benefits listed below for the PARIS database would be equally applicable to an air quality permitting and reporting database system. In addition, information on ongoing air monitoring for facilities would be more accessible to community members if there was an electronic air quality database system. I would like to suggest the creation of a state-wide electronic air quality permitting and reporting information system.

https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-database
Why use PARIS?
• Improve management of general permits.
• Accommodate a single facility with multiple permits.
• Capture required data elements for EPA.
• Provide a flexible reporting system including access to more data elements.
• Allow additional staff, such as inspectors, to enter data.
• Improve the data quality by providing easier and more intuitive data entry screens.