



Northwest Pulp & Paper
ASSOCIATION

December 18, 2018

Mr. Debebe Dererie
Air Quality Program
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: NWPPA comments on Ch. 173-405 WAC Kraft Pulp Mill Regulation

Dear Mr. Dererie:

The Northwest Pulp & Paper Association is a non-profit business association representing pulping and papermaking facilities in Washington, Oregon and Idaho on legislative and regulatory matters affecting the industry. NWPPA has reviewed the proposed revisions to Ch. 173-405 WAC and offers the following comments:

1. WAC 173-405-040(4) *Other TRS emission units* – We support the two proposed revisions in this subsection. Although the language changes are minor, both provide some clarity on agency intentions and are consistent with past rule implementation practice.
2. WAC 173-405-040(6) *Opacity* – We support the incorporation and referencing of alternative emission limits for hog fuel/wood-fired boilers during startup/shutdown/maintenance, soot-blowing/grate cleaning, and furnace refractory curing activities. These originate from the WAC 173-400 *General Air Regulation*.
3. WAC 173-405-040(7) *Alternative emission limitation* – Similarly, we support the incorporation/referencing of WAC 173-400-081 and -082 into the Kraft pulp mill regulation.
4. WAC 173-405-072 *Monitoring requirements* – The rule language adjustment to stretch the allowed submittal timeline for source test results to 60 days following the testing is appreciated. This simply acknowledges the typical time frame needed for source test contractors to produce a final test report.

Finally, the opportunity before the Dept. of Ecology and the industry is to review WAC 173-405, identify the few applicable requirements unique to the Kraft mill rule, and to create a subsection in the General Air Regulation to house those. Obsolete requirements in the Kraft mill rule could be eliminated. This action would allow WAC 173-405 to be rescinded. Substantial administrative benefits would be enjoyed by Ecology and the industry, as the redundant requirements appearing in both the Kraft and General regulations could be removed from Air Operating Permits. Ecology recognizes this opportunity with some discussion in the Least Burdensome Alternative analysis presentation provided with this rule amendment package, and makes a soft commitment to address this in future rule-making. Unfortunately, NWPPA views this as a missed opportunity and encourages early action in this regard and looks forward to working with Ecology to accomplish this goal.

Thank you for the opportunity to share these comments.

Sincerely,

A handwritten signature in cursive script that reads "Christian M. McCabe".

Christian M. McCabe
Executive Director
Northwest Pulp & Paper Association