

Jason Bouwman

Submitted via email before informal comment period opened.

**From:** [Huitsing, Gary \(ECY\)](#)  
**To:** [Kildahl, Linda J. \(ECY\)](#)  
**Subject:** FW: Rulemaking Stakeholder Meeting: Amendments to Chapters 173-400 and 173-401 WAC  
**Date:** Monday, April 15, 2024 10:21:03 AM

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fyi

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**From:** Jason Bouwman <JasonB@nwcleanairwa.gov>  
**Sent:** Friday, April 12, 2024 9:31 AM  
**To:** Huitsing, Gary (ECY) <ghui461@ECY.WA.GOV>  
**Subject:** RE: Rulemaking Stakeholder Meeting: Amendments to Chapters 173-400 and 173-401 WAC

External Email

Hi Gary,

Glad I could provide a bit of help with this. The new manual looks great. Removing all the redundant methods really cleans it up. I like the changes. Good work!

I hope you're well and look forward to catching up sometime in the future.

Cheers,  
-Jason

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**From:** Huitsing, Gary (ECY) <[ghui461@ECY.WA.GOV](mailto:ghui461@ECY.WA.GOV)>  
**Sent:** Thursday, April 11, 2024 4:56 PM  
**To:** Jason Bouwman <[JasonB@nwcleanairwa.gov](mailto:JasonB@nwcleanairwa.gov)>  
**Cc:** Kildahl, Linda J. (ECY) <[LKIL461@ECY.WA.GOV](mailto:LKIL461@ECY.WA.GOV)>  
**Subject:** RE: Rulemaking Stakeholder Meeting: Amendments to Chapters 173-400 and 173-401 WAC

Thanks Jason!

Good catch! Great points all!

I have already flagged those edits in track changes just now.

We really appreciate this input!

We also want to thank you again for the input you provided a few years earlier and we are glad that we are getting closer to finally implementing those changes also!

Gary H.

Gary Huitsing, PE  
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**From:** Kildahl, Linda J. (ECY) <[LKIL461@ECY.WA.GOV](mailto:LKIL461@ECY.WA.GOV)>  
**Sent:** Thursday, April 11, 2024 4:38 PM  
**To:** Jason Bouwman <[JasonB@nwcleanairwa.gov](mailto:JasonB@nwcleanairwa.gov)>  
**Cc:** Huitsing, Gary (ECY) <[ghui461@ECY.WA.GOV](mailto:ghui461@ECY.WA.GOV)>  
**Subject:** RE: Rulemaking Stakeholder Meeting: Amendments to Chapters 173-400 and 173-401 WAC

Hi Jason,

Thanks for providing feedback. Gary Huitsing, in our Engineering and Permitting Section, is the lead on the manual, but I am happy to accept your comments. We will begin accepting informal comments on the draft manual and rule language starting the day of the meeting, so you will have an opportunity to submit additional comments online if you choose. Since you're written them up, I will go ahead and add your comments to our online system. You will be able to see them on the [rulemaking webpage](#) once the link goes live – on April 18. At this stage, it is informal, but we will consider all comments received.

Also, we will post the slides after the meeting—it usually takes about a week.

Let me know if you have questions.

Thanks,  
Linda

**Linda Kildahl** (she/her)  
Air Quality Program  
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[Linda.kildahl@ecy.wa.gov](mailto:Linda.kildahl@ecy.wa.gov)

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**From:** Jason Bouwman <[JasonB@nwcleanairwa.gov](mailto:JasonB@nwcleanairwa.gov)>  
**Sent:** Thursday, April 11, 2024 2:54 PM  
**To:** Kildahl, Linda J. (ECY) <[LKIL461@ECY.WA.GOV](mailto:LKIL461@ECY.WA.GOV)>  
**Subject:** Rulemaking Stakeholder Meeting: Amendments to Chapters 173-400 and 173-401 WAC

External Email

Hello Linda,

A co-worker forwarded me the invitation for the stake holder's meeting regarding amendments to Chapters 173-400 and -401, including the Source Test Manual. I won't be able to make the

meeting but I have a few comments on the Source Test Manual revisions I'd like to share. I am hoping you are the correct person with which to share these comments.

In each WDOE method 9A and 9B (2<sup>nd</sup> paragraph of section 2) there are still four instances of gendering the observer (as "his"). It appears there was an attempt to remove gendered language in the methods but these eight instances were not changed. If the intent was to remove them, I just wanted to point this out.

I'd also like to suggest removing from the 4<sup>th</sup> paragraph of section 2 (in each method) the requirement of recording the "estimated depth of the plume at the point of observation". I am not sure why this was originally included in the method as I've yet found no reason for this requirement. EPA Method 9 does not require this, and it feels both unnecessary and problematic if someone challenges the VE observations as it is not generally able to be confirmed but easily debated. As a former stack tester who has performed 100s of VE observations, if I were to try to undermine a VE reading, this is a piece of data that I feel is easy to challenge as incorrect. Especially for plumes that contain water vapor and are read after dissipation of the water vapor.

That said, I do not know all things so, obviously, if there is a valid reason I'm not aware of for this being included, I would be excited to know what that reasoning is.

Thank you for considering my comments.

Best wishes,

-Jason

**Jason Bouwman** he/him

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