



Robert Poole
Director, NW Regulatory Affairs

August 9, 2021

Sent by Electronic Mail to Comment Online

Elena Guilfoil
Washington Dept of Ecology
Air Quality Program
PO Box 47600
Olympia, WA 98504

Subject: WAC Rulemaking Chapter 173-423, 173-400-025

Dear Ms. Guilfoil,

Western States Petroleum Association (WSPA) appreciates the opportunity to provide input on the Department of Ecology WAC Rulemaking Chapter 173-423, 173-400-025. WSPA is a trade association that represents companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas, and other energy supplies in Washington and four other western states.

The way the world produces and consumes energy is evolving. The members of WSPA are on the cutting edge of those changes, investing in and developing the diverse energy sources and technologies of the future. We believe that all of these energy sources are part of the future of transportation. Newer research is coming out that a diverse set of energy sources are what will achieve the climate goals now required under SB 5126, which may ultimately result in a conflict between adoption of Section 177 regulations and SB 5126.

WAC Rulemaking Chapter 173-400-025

WSPA understands that Ecology is not required to adopt EPA's revised major NSR applicability test. However, doing so would streamline the permitting process and we request that Ecology consider aligning these rules to be consistent with the EPA rules that are being implemented.

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Please feel free to contact me directly for any questions, etc. I can be reached via email at: Bpoole@wspa.org or cell at: (805) 833-9760.

Sincerely,



cc: Tiffany K. Roberts
Vice President, Regulatory Affairs
Western States Petroleum Association

Jessica Spiegel
Director, NW Region
Western States Petroleum Association