



Northwest Pulp & Paper
ASSOCIATION

February 1, 2022

Katie Wolt
Air Quality Program
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: NWPPA comments on WAC 173-446A Criteria for Emissions-Intensive, Trade-Exposed Industries

Dear Ms. Wolt:

Thank you for the opportunity for the Northwest Pulp & Paper Association (NWPPA) to provide comments on the Department of Ecology's Criteria for Emissions-Intensive, Trade-Exposed Industries (EITE) rulemaking, Ch. 173-446A, WAC, as referenced above.

NWPPA is a 65-year-old regional trade association representing 10 member companies and 14 pulp and paper mills and various forest product manufacturing facilities in Washington, Oregon and Idaho. Our members are at the forefront of Washington GHG reduction and air quality improvement efforts. NWPPA members have embraced technically advanced and scientifically sound controls on air emissions over the past 20 plus years. We are committed to the hard work, expense, and discipline it takes to be good partners in our respective communities

Our review of the proposed language revealed an area of concern related to the use of a 15% Trade Share as the criteria by which an entity can be classified as an EITE (WAC 173-446A-040(2)(b)(ii)(A)). This is the critical factor in defining whether a facility is "trade-exposed." There appears to be no reference in the proposed rule language or supplemental public meeting materials as to why 15% is the appropriate value.

While we realize that Ecology is unaware of any facilities currently located in Washington that would be likely to petition for an EITE designation, the responsibility to be mindful of a potentially harmful precedent remains. As Ecology works through these regulation development activities, NWPPA would encourage an open, transparent and data-based process to explain how more discretionary or subjective elements of the EITE criteria are established.

Thank you again for the opportunity to provide comment on this important rulemaking. Please let us know if you have any questions.

Sincerely,

Jackie White
Director of Regulatory and Technical Affairs
Northwest Pulp & Paper Association