



*Representing Clallam, Grays Harbor, Jefferson,  
Mason, Pacific, and Thurston Counties*

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August 18, 2025

Washington Dept of Ecology  
Attn: Caitlyn Roehmholdt, Rulemaking Lead  
P.O. Box 47600  
Olympia, WA 98504-7600

Re: Comments regarding 2025 Outdoor Burn Rule making

Caitlyn,

The Olympic Region Clean Air Agency (ORCAA) is an important stakeholder in Ecology's efforts to update Chapters 173-425, 173-430 and 173-400 of the Washington Administrative Codes (WAC) regarding flame cap kilns and air curtain incinerators. ORCAA is one of seven local clean air agencies in Washington, with regulatory authority in Clallam, Grays Harbor, Jefferson, Mason, Pacific, and Thurston Counties.

Outdoor burning is an important source of air pollution in these counties. As such, ORCAA has a keen interest in working with Ecology to ensure the rule updates meet the intent of the 2024 changes to the Washington Clean Air Act (RCW 70A.15) brought about by SSB 6121. This rulemaking is an opportunity for Ecology to provide additional clarity to regulatory agencies, stakeholders, and the public.

ORCAA supports the use of flame cap kilns and air curtain incinerators provided they are used in a manner that reduces emissions relative to open burning. However, emissions from these devices could be problematic if the material burned is not monitored to ensure a clean feedstock. Emissions could also be a problem if the combustion of the material is not controlled to ensure the proper amount of oxygen.

ORCAA also recommends Ecology use this rulemaking to eliminate agricultural burning in Urban Growth Areas (UGAs). Since the burn restrictions that came about in 2007, limiting burning in UGA's, alternatives to burning in those area have developed and are being used in other circumstances, so they could be used for agricultural burning as well.

Based on ORCAA's review of the draft rule changes, we are submitting the attached comments regarding the use of flame cap kilns and air curtain incinerators. We hope you will find the attached comments useful and if you have any questions, please feel free to reach out to Mike Shults, Compliance Manager, or to Dan Nelson, Communications Manager.

Sincerely,

*Mike Shults*

Mike Shults  
Compliance Manager

Cc: Jeff Johnston, ORCAA Executive Director  
Dan Nelson, ORCAA Communications Manager