

Puget Sound Clean Air Agency (Betsy Wheelock)

Thank you for including the Puget Sound Clean Air Agency (Agency) in this stakeholder process. We have read the materials provided. As we read the proposal, this change, if implemented, would apply within the jurisdiction of the Department of Ecology and would not apply within the jurisdiction of the Agency. Therefore, we would reserve our ability to require an NOC Order of Approval for air curtain incinerators within the Agency's jurisdiction. We feel that the NOC Order of Approval process is important to ensure consistent regulation and use of these emission units. Regarding the emission limitations referenced in WAC 173-400-050 (1), the Agency's Regulation I, section 9.09 (Particulate Matter Emission Standards) replaces that section of the WAC in our State Implementation Plan, as approved by EPA in April 2020. We will continue to enforce the standard in our Regulation I within our jurisdiction. Can you please confirm this reading and understanding of the jurisdiction of this proposal as part of your response to these comments?

For technical clarity on this preliminary proposal, can the Department of Ecology identify any existing sources and/or emission units which are currently subject to this WAC provision that Ecology is proposing to exclude applicability for air curtain incinerators? It would help give context and understanding of how these rule provisions are still providing air quality benefits.

Thank you for providing the opportunity to comment.