

# Northwest Clean Air Agency (Agata McIntyre)

Hi Cooper,

We've been tracking the rulemaking that involves air curtain incinerators and have a comment on the language for your consideration. I ran this by Phil Gent and he suggested that I send it to you in writing.

A little context: My understanding of the rulemaking is that the goal is to enable ACIs to be used for dispose of natural vegetation, instead of pile burning, where pile burning is currently allowed. If that's the intent, please consider making a change to clarify that the 0.2 gr/dscf standard applies only when the ACI is brought to the site with the vegetation, and not to an ACI at stationary sources (where the vegetation is brought to the ACI).

Why I mention this - We've been asked by a facility about permitting an ACI as a stationary source to make biochar to blend into their product. In this case, the facility would like to bring vegetation to the ACI to make the biochar. We believe that in this case, the existing 0.1 gr/dscf standard, which applies to all other stationary combustion and incineration units, is appropriate.

Suggested change in red:

WAC 173-400-050 Emission standards for combustion and incineration units. (1) Combustion and incinerator emissions units must meet all requirements of WAC 173-400-040 and, in addition, no person shall cause or allow emissions of particulate matter in excess of 0.23 gram per dry cubic meter at standard conditions (0.1 grain/dscf), except for

- (a) An emissions unit combusting waste wood for the production of steam.
- (b) An air curtain incinerator used to dispose of natural vegetative debris at its site of generation. ~~disposing~~ that would otherwise be legal for silvicultural, agricultural, or open burning.

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Please give me a call if any questions.

Thank you,

Agata McIntyre, P.E. she/her/hers  
Engineering Manager  
[Northwest Clean Air Agency](#)

Phone: 360-419-6848