



We Feed You

February 14, 2026

Anthony Bruma
Department of Ecology, Air Quality Program
300 Desmond Dr SE
Olympia, WA 98504

Submitted via [Comment Online](#)

Re: WAC 173-448, Preliminary Draft Rule Language, November 2025

Dear Mr. Bruma,

Food Northwest appreciates this opportunity to provide comments on Ecology's preliminary draft rule, Chapter 173-448 WAC, Air Quality in Overburdened Communities.

Food Northwest is a 112-year-old trade association of food processors with facilities in Washington, Oregon, and Idaho, including nine emissions-intensive, trade-exposed (EITE) facilities in Washington.

We have two major concerns with the draft rule:

- Consistency of the draft rule with the intent and approach to reducing criteria pollutants specified in RCW 70A.65.020; and
- Consistency with the mandate in RCW 70A.65.020(2)(c) that requirements on permitted stationary sources cannot be disproportionate to their contribution to criteria pollutants.

The draft rule focuses solely on emissions-reduction requirements for stationary sources and assumes that air quality targets can be met by imposing stricter standards or limitations on these sources.

The approach outlined in RCW 70A.65.020 addresses all pollutant sources.

Under this statute, Ecology must identify overburdened communities (OBC) and, for each, determine the levels of criteria pollutants and the corresponding air quality targets. Section 2(b)(i). Then it is to determine within the OBC "which **sources** are the **greatest contributors** and develop a **high priority** list of **significant emitters**." Section (1)(c)(i). There is no limitation on the term "sources", so this would require evaluating all pollutant sources, identifying the greatest contributors

among these, and listing the significant contributors. In Section 2(b)(ii) Ecology is then to “identify the stationary and **mobile** sources that are the greatest contributors of those emissions that are increasing or not decreasing.” The statute thus specifically addresses mobile source emissions. Further, the direction to Ecology in Section 2(b)(iii) to “achieve the reduction targets through adoption of emission control strategies or **other methods**” anticipates using other methods to reduce emissions from mobile and other sources. Moreover, Section 2(c) states that actions “may not impose requirements on a permitted stationary source that are disproportionate to the permitted stationary source’s contribution to air pollution compared to other permitted stationary sources and **other sources of criteria pollutants**” in the OBC. This mandate requires Ecology to identify the emissions levels and their proportionate contributions to total emissions for each pollution source. A stationary source may not be required to reduce more than its proportionate share of emissions, that is, assume responsibility for reducing the emissions of another source, in order that the OBC air quality targets may be achieved.

Ecology’s reports and recent source apportionment studies reveal the need to include all sources in emissions evaluations. For example, Ecology’s report states that “wildfire smoke is the greatest source of air pollution in Washington.”¹ It identifies cars and trucks as the largest contributors of NO_x and CO. Other sources include fossil fuel combustion across various uses. Residential wood combustion is the largest source of PM_{2.5}. Dust from tilling and harvesting, roads, and construction are the largest sources of PM₁₀.

Recent source apportionment studies have identified the proportionate share of PM_{2.5} from multiple sources. The Seattle study found diesel/gasoline to be the largest contributors to total PM_{2.5} levels, accounting for 29% at one site and 50% at the second site.² A recent Port of Tacoma apportionment study found wood smoke to be the largest contributor to PM_{2.5} at 27.2%, followed by 19% from ships, 13.3% from vehicles, and 9% from industrial boilers, cement kilns, and off-road vehicles combined.³

¹ Ecology, [2025 Report: Overburdened Communities Highly Impacted by Air Pollution](#), Publication 25-02-037, December 2025, p. 26.

² Beth Friedman (2020), [“Source apportionment of PM_{2.5} at two Seattle chemical speciation sites”](#), *Journal of the Air & Waste Management Association*, 70:7, 687-699, p.690.

³ Ecology, [Technical Report: Port of Tacoma Source Apportionment Study](#), Publication 23-02-075, June 2023, p. 16.

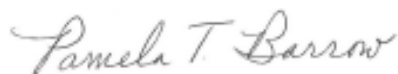
It becomes apparent from Ecology's reports and studies that requiring emissions reductions only from permitted or registered sources will not achieve meaningful reductions in criteria pollutants. Ecology's most recent air emissions inventory shows mobile sources accounted for 30% of criteria emissions, while stationary sources contributed only about 4%.⁴ Using the Port of Tacoma study results, focusing on permitted sources (industrial boilers and cement kilns) would address less than 9% of total PM2.5. Nearly 60% of PM2.5 emissions would remain unaddressed.

Food Northwest disagrees with the draft rule's definition of "high priority significant emitters" or "high priority emitters." The draft rule defines them as "permitted or registered sources" that "cause or contribute to criteria air pollution". WAC 173-448-030. Permitted and registered sources should not automatically be classified as high priority significant emitters. Using the Port of Tacoma results, only industrial boilers and cement kilns, the lowest emitters, would fit this definition. The statute does not define "high priority emitters" as permitted or registered. It requires identifying the "greatest contributors of criteria pollutants" and then listing the "high priority emitters," which would be individual emitters within the greatest contributors. Considering all sources at the Port of Tacoma, wood smoke, ships, and vehicles are the greatest contributors.

In conclusion, Food Northwest urges that the draft rule be revised to include provisions for determining the contribution of all emission sources, consistent with RCW 70.65.020 (1)(a), and for determining the proportionate share of responsibility among sources, consistent with RCW 70A.65.020 (2)(c). The statute does not limit the rule to stationary sources.

Thank you for this opportunity to provide comments on the draft preliminary rule. Food Northwest looks forward to working with Ecology throughout this process.

Sincerely,

A handwritten signature in cursive script that reads "Pamela T. Barrow".

Pamela Barrow
Vice President, Food Northwest

⁴ Ecology, [2020 Washington Comprehensive Emissions Inventory](#) (updated 2024), Publication 20-02-012, Table 4-2.