



Northwest Pulp & Paper  
ASSOCIATION

May 15, 2026

Submitted Via Online Comment Portal

Linda Kildahl  
Department of Ecology  
300 Desmond Dr SE  
Olympia, WA 98504

Dear Linda Kildahl,

Thank you for the opportunity for the Northwest Pulp & Paper Association (NWPPA) to provide comments on Ecology's preliminary draft rule language for WAC 173-440 and WAC 173-476, Air Quality Standards and Impact Levels.

NWPPA is a 70-year-old regional trade association representing 11 member companies and 13 mills in Washington, Oregon, and Idaho, seven of which are located in Washington state. Our member mills in Washington provide approximately 4,000 union-backed, family wage jobs in some of Washington's more rural, economically distressed communities. Mills provide a 3:1 job multiplier and are often the single largest taxpayer in these communities, a large portion of which is distributed as funding for schools and emergency services.

While it is understood that the primary purpose of the proposed draft rule is to incorporate the updated NAAQS and associated threshold values for PM-2.5 and sulfur oxides, the proposed removal of WAC 173-476-130(5), the sunset provision for areas that achieve an EPA status designation of attainment, is highly concerning to NWPPA members. The removal of the sunset provision is anti-competitive for impacted industries and facilities in Washington State, and it compromises the incentive for facilities to modernize and undertake enhancement projects. Pulp and paper mills in Washington are highly susceptible to leakage of emissions, production, and jobs. For this reason, we recommend that Ecology retain the sunset provision in WAC 173-476-130(5).

Thank you for your time and consideration of these comments.

Sincerely,

Jackie White  
Director of Regulatory and Technical Affairs, NWPPA