

Alcoa Corporation

Governor Inslee's Directive 19-18 intends the GAP rule to apply to "major industrial projects and major fossil fuel projects; and establish uniform methods, processes, procedures, protocols or criteria that ensure a comprehensive assessment and quantification of direct and indirect greenhouse gas emissions resulting from the project". The Department of Ecology's (DOE) framework document specifies, "the term 'project' includes a new public or private facility or a change to an existing facility."

Currently, Alcoa's aluminum facilities in Washington State are curtailed which means that they are not in active production but are maintaining permits in order to preserve the potential for a re-start. Alcoa sought and received assurance in discussions with senior advisors within the Department of Ecology and other members of the GAP rule team, that the re-start of a curtailed facility would not be considered a new project, and therefore would not trigger the GAP rule process so long as the curtailed facility had properly maintained its Air Operating Permit (AOP). However, because "change to an existing facility" is not clearly defined in the proposed rule and could be very broadly construed to include a re-start, we urge you to include language in the proposed rule that would specifically exclude re-starts of curtailed facilities.