Washington Department of Ecology

Chapter 173-400 Rule Advisory Committee Meeting #3
Meeting Notes for July 21, 2009

Location: Stoel Rives

Time: 9:30 AM – 4:00 PM

Advisory Committee Members & Observers Present:
Matt Cohen (Stoel Rives), Paul Mairose (SWCAA), Jay Willenburg (CH2), Pete Hildebrandt (WSPA), Tom Beam (Fluor Hanford), Steve Van Slyke (PSCAA), Heather Trim (People for Puget Sound), Lynn Billington (NWCAA), Holly Bowers (WRPS), Ken Johnson (Weyerhaeuser), Doug Hendrickson (ECY), Maren Seibold (Trinity Consultants), Eric Hansen (Environ)

Staff Members Present:
Rich Hibbard, Tom Todd, Lindsay Blain, Sarah Rees, Al Newman, Judy Schwieters, Kay Shirey (ATG)

Meeting Objectives:
- Revisions section 107 – Excess Emission Policy
- Federal Nonattainment NSR Requirements
- New Section 036 – Non-Road Engines Source

Meeting Started at 9:30am

Welcome: Tom Todd

Presenter #1: Tom Todd
Revisions to Section 107 - Excess Emissions

Ecology's Point of View
- **We recognize that the current 107 needs updating.**
- **EPA wants states to adopt the provisions of the 1999 Herman guidance into State rules.**
- **We also understand that a guidance document is in fact guidance not a rule.**

What changes do we approve? (1)

- **In the applicability sub-section (1)**
  - **Affirmative defense does not apply if there is an exceedance of the NAAQS.**
  - **The section does not apply to:**
    - **Federal emissions standards under 40 CFR Parts 60, 61, 62, or 63, or**
    - **Standards under Title IV or VI of the Federal CAA, or**
    - **Limits permitted under WAC 173-400-081; NOC or PSD.**

WAC 173-400-107 Excess emissions. (1) The owner or operator of a source has the burden of proving to ~~ecology or~~ the permitting authority or the decision-making authority in an enforcement action that excess emissions were unavoidable. This demonstration will be a condition to obtaining

relief under subsections (4), (5) and (6) of this section. **The affirmative defense will not be granted if the permitting authority determines that the exceedance of any relevant ambient air quality standard has occurred and can be attributed to the source. This section applies to all emission standards or limitations except for those that are:**

(a) Regulated under 40 CFR parts 60, 61, 62 or 63 or a permitting authority's adoption by reference of such federal standards, or

(b) Promulgated under Titles IV or VI of the Clean Air Act, or a permitting authority's adoption by reference of such federal standards.

(c) Found in permitted limits addressed directly within a Notice of Construction Approval Order or in a PSD permit pursuant to the criteria in WAC 173-400-081.

C: Tom, you didn't redline all the comments. I'll flag some that you missed. I'm hard pressed to find any of the Herman Guidance that you did not fit into here somehow. The net effect does not fulfill what we originally adopted. Of the provisions you adopted so far, there are two features that go against the core of what we should be doing. 1. The revisions making the defense unavailable for NSR emission limits. (Paragraph c)

A: If you have an alternate set of permit limits they should have been crafted in a way so you don't need the excess limits each time the event occurs.

C: Start up/Shut down provisions. All this stuff is in there, why would we exclude it from excess emissions?

C: If you have a NOC you don't have anything in 081. It's the permit conditions that are addressed in 0801 that are not required in 173.

C: As a permit writer, the sources we are talking about are complex. How do we apply this section to old permits that don't have these limits in the permits? Grandfather them in?

C: There is a lot of text change that I am not sure that really adds to the intent of the existing rule. Let's fix what's broken instead of re-writing the whole thing. What does EPA think is broken and can we make minor fixes to make EPA happy?

C: We should look at the minimum changes needed and not necessarily everything EPA is asking for, some might not have a basis in practicality.

C: There were some problems. Such as, inconsistency in the level of application.

C: My question was partially answered. What needs to be changed based on law? What needs to be addressed?

A: EPA is driving the changes as well as from one local authority needs clarification.

C: How does it pertain to a violation? EPA has held out and needs clarification; adding clarification on when this rule should be applied. EPA had other requested but we are not necessarily doing them.

C: We changed our local rule because when we started to use this rule it was not clear and we found conflicting views. We provided them a form on what we really needed. We have a more local rule

that gives us the criteria we need and has to be signed off by a high level manager at the plant. What we are telling you about this event is truth.

C: What kind of criteria did you use?

C: Where it fits in the system. What was the cause? Act of nature or not? Do we need to go a little deeper to see what rules they really violated to see if there was a violation?

C: It was a rule change for title 5. They have to answer the questions and a higher level manger sign off of it.

C: How is this going to affect our SIP?

A: "(1)(C)" is a serious change is scope but we don't get any changes in 107.

C: Why are Titles 4 and 6 included in the text and what are they?

A: 6 is CFC and 4 is acid rain.

C: Changes in (1)(A) and B are changes that we said were appropriate and they have their own SSM set up. (C) is a very big deal. Even if you limit to startup and shut down there is still a possibility that there will be a failure.

A: Better drafting that may happen during start up shut down.

C: During startup the limit should be X.

C: Your intent here was not to exclude NOC limits.

A: That's correct.

C: A form is really helpful to get the information that we really need to make the decision.

C: Not available if there is an Ambient Air exceedance. There are two reasons that it was not made at the time. Where an exceedance is large enough you better have a good reason for not planning for that occurrence.

C: Determination would be by the authority.

C: We have refineries that can have excess by malfunctions. You should know that. They need to take time ahead of time. They have the money to do the modeling and pre plan for the exceedances on the fence line.

C: I agree with the standard.

C: What would ecology do if there was an exceedance because of a natural disaster?

C: Tom I don't think it's realistic to say that the rule puts the burden on the authority agency. If you put this in the rule, an agency is going to point to the source and they need to prove that it didn't cause of NAAQS violation. More care should have been taken to avoid the violation.

A: EPA wanted and they feel very strongly when you go over the NAAQS violation because it is a health based standard. There is still discretionary decision with the appointing authority on issuing a penalty.

C: Beyond control and outside of normal business practices, how much are you going to hold the business accountable?

C: One of the things EPA is stating. We are going to allow a little bit to be explained but we cannot allow at the state level to have extreme excesses of NAAQS.

C: One of the criteria we are asking for an estimate of how much emissions they will emit.

C: What EPA would say is that affirmative defense is not available.

C: Theoretical/Practical. Is there an example out there?

C: States attainment standard. Can you link this rule to monitoring data?

C: It probably wouldn't be enough for EPA.

C: I support this language. We have had violations based on hits from monitoring sites.

C: Who else uses this defense?

A: Port Townsend Paper. They only claim 107 on average once a month.

C: If you are Title 5 Company, it's the cost of doing business. You should be spending the money to model.

C: The burden is on the permitting authority to determine if they violated the NAAQS. The burden tends to shift and turn the burden onto the company.

What changes do we propose? (2)

- **Sub-section (2) says that Excess Emissions are always violations, but if found to be unavoidable, not subject to penalty.**

(2) Excess emissions determined to be unavoidable under the procedures and criteria in this section are violations of the underlying statute, regulation, or permit and subject to injunctive relief, but are not subject to penalty by the permitting authority. ~~shall be excused and not subject to penalty.~~

C: It wasn't your intent to disqualify the exceedances to the rule.

C: Determinations under this section are not binding.

C: Take out by the permitting authority.

C: You need to have the affirmative defense comment in there.

C: If the permitting authority finds it unavoidable then that is binding?

A: EPA didn't like that the permitting authority decision is not conclusive and that it cannot be overturned by a federal judge.

What do we propose? (3)

- **Subsection (3)**
  - **Defines what must be included in the report.**
  - **Defines what must be in the contemporaneous record, if the source wishes to claim unavoidable excess emissions**

(3) (a) Excess emissions which represent a potential threat to human health or safety ~~or which the owner or operator of the source believes to be unavoidable shall~~ must be reported to ~~ecology or~~ the permitting authority as soon as possible, but in no case later than 12 hours after the excess emissions were discovered. Other excess emissions must be reported within thirty days after the end of the month during which the event occurred or as part of the routine emission monitoring reports.

(b) ~~Upon request by ecology or the authority, the owner(s) or operator(s) of the source(s)shall submit a full~~ A follow-up written report must be submitted within 30 days of the after the end of the month during which the event occurred. ~~when the excess emissions were discovered.~~ A written contemporaneous record of all reported excess emissions, for which an affirmative defense is being requested, must be submitted as a part of the report. The written report must include:
(i) Date, time, duration of the episode, and
(ii) Known causes, and
(iii) The quantity of excess emissions, and
(iv) The corrective actions taken, and
(v) Whether emission monitoring systems and pollution control systems were operating, if these were not operating, the time the duration that systems were inoperable, and
(vi) A copy of the written contemporaneous record, and
(vii) the preventive measures to be taken to minimize or eliminate the chance of recurrence.

(c) A written contemporaneous record of all reported excess emissions, for which an affirmative defense is being requested, must be submitted as part of the report. The record must include:
(i) the estimated quantity of emissions released, and
(ii) the method used to determine the quantity of excess emissions, and
(iii) the probable cause of such excess emissions.

C: This has turned into the most complicated thing. This section is ambiguous and has created uncertainty for people. What does Ecology want in the way of reporting? What kind of report are you requesting?

A: I would expect it to be by e-mail or phone calls letting us know that you need to alert people.

C: You want quick summary, abbreviated notice and then a follow up report.

C: Change report to notification.

C: Contemporaneous record? What is it?

C: Are we looking at hour for hour, day by day? It's vague enough. What do you want on the report and when?

A: From my experience an hour by hour would be better and beneficial for the company and agency to track what is happening and learn from what happened.

C: Need to clarify contemporaneous.

C: One set of criteria for the state would be a good idea. But not using the same form statewide.

C: Excess emissions need to be reported by 30 days after the end of the month. Should it be when it occurred or when you discovered the occurrence?

C: A lot of process control, a lot of documentation, you should know in real time for large companies. I feel it's true for small companies too.

C: Contemporaneous is in (3)(B) and C. Should only be in one. (C) seems a little over the top, if you responded in a timely fashion then you should have all the information and it seems redundant to put it in (C).

What changes do we propose? (4)

- **Sub-section (4) – Startup and Shut down demonstration in the report must show:**
  - **Excess Emissions were short in duration.**
  - **Emissions were minimized consistent with good air pollution and safety practices.**
  - **Added a control device warm up period for unavoidable status.**
  - **Steps were taken to minimize the impact of the emissions on ambient conditions.**
  - **Monitoring devices were kept in operation as much as possible, and**
  - **The emissions were not a part of permit conditions from WAC 173-400-081.**

(4) Excess emissions due to startup or shutdown conditions ~~shall~~ must be considered unavoidable provided the source reports as required under subsection (3) of this section and adequately demonstrates:

(a) That the excess emissions were short in duration and could not have been prevented through careful planning and design and better operations and maintenance; and

(b) The emissions were minimized consistent with safety and good air pollution control practice during the start up and shutdown period, and

(i) if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage, or

(ii) if the bypass is due to cold start up conditions of the control device, the control device is brought to operating temperatures as quickly as possible; and

(c) Steps were taken to minimize the impact of the excess emissions on ambient air quality, and
(d) All emission monitoring systems were kept in operation unless their shutdown is necessary to prevent loss of life, personal injury, or severe property damage; and
(e) The emissions were not anticipated and addressed in permit requirements implementing WAC 173-401-081.

C: Need to change must to will or are. Shall is a lawyers term and should not be substituted for must.

C: In 4a it seems your adding subjective criteria. Take out "short in duration".

C: Are you going to force a facility to shutdown or let them idle? Should be a 081 provision in the NOC.

C: And better operation is arbitrary.

C: Take out "cold" in (ii).

C: The last sentence in (b) takes care of (ii).

C: I would dump (c).

A: It is covered but we need to check with EPA to make sure they don't have a reason that they want it to stay.

C: (E) picks up what you had in (1), you could drop it and be covered in (1)(c).

C: Why are we putting in Title 6 when we can't do it?

A: It was something EPA wanted.

C: Title 4 is not delegated it's an approved program.

What changes do we propose? (5)

- **Sub-section (5) – Maintenance**
- **We only added a requirement for unavoidable excess emissions reports to "meet all other applicable requirements of this section".**
- **Since maintenance activities are not addressed in the 1999 Herman Guidance we hope that this language is sufficient to satisfy EPA.**

(5) Maintenance. Excess emissions due to scheduled maintenance will be considered unavoidable if the source reports as required under subsection (3) of this section, meets all other applicable requirements of this section, and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.

C: EPA wants us to give up this section, but we feel it should be in here.

C: Meets all other applicable requirements would bring meaning to all other sections that are not relevant. Just because you have scheduled maintenance you can't have affirmative defense.

C: The people making these comments don't have plant expertise.

What changes do we propose? (6)

- **Sub-section (6) – Upsets**
  - **Added a requirement that all monitoring and control devices are kept running to the extent possible.**

(6) Upsets. Excess emissions due to upsets including upsets during maintenance activities will be considered unavoidable provided the source reports as required under subsection (3) of this section and adequately demonstrates that:

(a) The event was beyond the reasonable control of the owner or operator, not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition; and

(b) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and

(b) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and

(c) The operator took immediate and appropriate corrective action in a manner consistent with safety and good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

(d) All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown is necessary to prevent loss of life, personal injury, or severe property damage.

C: What is the rational for upsets for maintenance activities?

A: Something happens and you are not able to follow the plan it would be in upsets and not in maintenance.

C: Paragraph 6 – don't need the new language. "Including upsets during maintenance activities" – could take it out and still not change the language.

C: What would make an upset not a qualifying event? Could you have reasonable prevented it? Every upset is avoidable if you spend enough money. What is reasonable control of the owner mean? What are you hoping to pick up by putting this in?

A: This comment was put in lieu of something EPA wanted.

C: It appears that you're putting language in to appease EPA or other entities and not just for making the rule work.

C: Avoidable Emissions are not reoccurring occurrences because you know they are going to happen.

Presenter #2: Al Newman

WAC 173-400 Updates – Sections 112, 113, 131, 136 and Proposed Sections 800-880

Purpose of Revisions

- **Imminent nonattainment area for PM2.5.**
- **Outdated nonattainment NSR requirements.**
- **Have fully SIP approved Nonattainment NSR program in the SIP.**
- **Current Emission Reduction Credit program is not approved in the SIP.**
- **Changes related to nonattainment requirements in section 113.**

Alternative Approaches

- **Full inclusion of the federal nonattainment NSR requirements of 40 CFR 51.165 into our rules.**
- **Inclusion of some requirements and processing requirements in rule and adoption by reference of other parts where possible (current approach).**
- **Figure out what the minimum text to include in our rule and adopt by reference everything else.**
- **Keep the current language and text adding new only what is required.**

Option	Pros	Cons
Inclusion by copying	All information is in one place "Version control" assured since no additional documents referenced. Maximum coordination between the NNSR and state NOC requirements Opportunity to reduce the number of other rules referenced in the PSD permitting sections	Lots of words and pages Might miss something
Inclusion by reference of appropriate federal rule sections	Minimum number of pages in our rule Best assurance of including required EPA language/requirements	Multiple documents required to have whole program Still might miss something Coordination with existing state NOC program not assured Included by reference document control to keep referenced versions
Partial inclusion by copying, and inclusion by reference	Intermediate length number of pages and words Coordination of state NOC and NNSR assured	Multiple documents required to have whole program Included by reference document control to keep referenced versions Still might miss something

C: In the next 5 years will there be additional areas for nonattainment?

A: Yes. Some are close we just don't have enough data to call them. We are also looking at a lower Ozone standard and a lower PM 2.5 standard in the near future. This is taking on new significance.

WAC 173-400-112

- **Proposal is to delete this section and incorporated its text and criteria in a proposed WAC 173-400-830 and 840.**

WAC 173-400-113

- **Proposal is to clarify understanding of the text and use of the table in current (3) paragraph.**
- **Add in missing requirement from 40 CFR 51.165 on denial of permits for projects that are unable to reduce impacts below the table values.**
- **Add line to table for PM2.5 in anticipation that EPA will finalize those portions of the implementation rule in time for inclusion in our rule.**

WAC 173-400-131

- **Proposal to add criteria that are in 40 CFR 51.165 on enforceability and source of offsets.**
- **Propose to clarify basis for emission reduction credits in (3)(a) by defining what the old actual emissions are.**
- **Add requirement to (5)(b) from state law that the number of credits issued must be less than the amount of the emission reduction the credit is being issued for.**

C: At the time the state PSD was a 5 year look back and the ERC was 10 year, or the other way around. The look back period was not consistent. The base line, how do you calculate base line emissions? Dave Bray could not figure it out.

WAC 173-400-136

- **Proposal adds criteria on the use of credits from 51.165 missing from the current version.**

C: Mr. Mairose noted that there has been attention by EPA staff on how the credit banking system is set up. Staff have experience from Eastern US where states have more formalized banking systems and would expect us to develop the same. Experience with the Portland –Vancouver O3 attainment and Maintenance SIPs was offered. Major point of comments is that rule text needs to be clear on issuance, use and retirement of credits.

Proposed Nonattainment New Source Review (NNSR) Permitting Requirements – the WAC 173-400-800 at seq. Sections

- **Goal is to get full SIP approval of the program.**
- **Current proposal is to incorporate verbatim the requirements for nonattainment NSR permitting into state regulation.**

Proposed Nonattainment NSR Sections

- **Patterned after current PSD section.**
- **Proposed sections:**
    - **800 Applicability**
    - **810 Definitions**

- **820 Determining if a New Stationary Source or Modification to a Stationary Source is Subject to these Requirements**
- **830 Permitting Requirements**
- **840 Emission Offset Requirements**
- **850 Actual Emissions Plantwide Applicability Limitation**
- **860 – 880 permit processing criteria**

WAC 173-400-800 Applicability

- **There is no currently proposed text for this. The language would state that the requirements in the following sections would apply to any new or modified source located in a nonattainment area that does or will emit a significant amount of the nonattainment pollutant.**

WAC 173-400-810 Definitions

- **Except for proposed (1) and (2), these are the definitions from 51.165.**
- **The definitions are alphabetized rather than EPA's as added order.**
- **Some are duplicates with those in 173-400-030 - this needs to be rectified yet.**
- **Specific proposals:**
  - **Have Major Stationary Source emission thresholds in a table rather than text.**
  - **Put Significant emissions increase values into a table rather than text.**
  - **In NSR Regulated Pollutant removed text about optional PM2.5 precursors.**

WAC 173-400-820 Determining if a New Stationary Source or Modification to a Stationary Source is Subject to these Requirements.

- **This is the mathematics to determine if there is a significant emissions change for a modification or new stationary source.**
- **Copied directly from 51.165(a)(2).**
- **Essentially identical to the calculations and test in 40 CFR 52.21(a)(2), except for the greater number of significant emission rates in the NNSR program.**

WAC 173-400-830 Permitting Requirements

- **This is current language in WAC 173-400-112(2).**
- **Only change proposed is deletion of current paragraph 112(2)(e)(i), (ii), and (iii) which relate to offsets sand are moved to proposed section 840.**
- **Additional changes may be appropriate if decision to not have proposed paragraphs 860 – 880 on permit processing included in final rule.**

WAC 173-400-840 Offsets

- **This is the offset rates and criteria in 51.165(a)(9).**
- **Philosophy is to include the offset ratios in the rule rather than in other documents such as the SIP.**
- **We have chosen to not implement the interpollutant trading option for PM2.5 precursors and this is reflected in the proposal.**

WAC 173-400-850 Actual Emissions Plantwide Applicability Limitation (PAL)

- **Required element of the federal major source NSR program.**
- **Copied verbatim from 51.165.**
- **As an alternative to copying the program verbatim into our rule, we could:**

    - **Adopt by reference the appropriates section in 40 CFR Part 51, Appendix S, or**
    - **Adopt by reference the appropriate section in 40 CFR 52.21.**
- **Use of Alternatives would require us to keep copies of the adopted by reference program to distribute to sources and consultants upon request.**

WAC 173-400-860-880

- **These are currently place holder sections. If used they would point to the paragraphs WAC 173-400-220, 171, and 750 related to permit processing.**

C: Are you going to talk about the Permit Processes?

A: No.

C: By the end of August we will have a PM2.5 non-attainment area.

C: Do we have test methods?

A: EPA has draft and proposed methods and has recommended us using them.

C: What is the role of precursors?

A: It's a two part test. Talking PSD, if you are significant for PM2.5 then you would look at NOX and SOX to look at for analysis. To affect the precursors you have to be in direct significance of more than 10 tons of PM2.5. Have verbal confirmation from EPA but still trying to get it in writing.

C: How do you deal with precursors?

A: Have to go through the background materials.

C: What is the hurry to do this (develop and issue nonattainment NSR rule language)?

A: We will have several areas of nonattainment and it makes sense while we have the rule open to make the changes.

C: Is it reasonable to do with this without them finishing their attainment rule?

A: It's better to have something in place than not have anything at all in place.

C: A cost benefit would be difficult. How does EPA approve it into the SIP if the sands are still turning?

C: How much do the definitions confuse our existing definitions? We walk a fine line because they are different at the state level.

A: There are about a dozen that are identical in 030.

C: What are the few that are different?

A: There are about 35-40 that we don't have. But they would be new so there is no conflict.

C: If we incorporate by reference, are we not bound to use EPA's policy and guidance?

A: If we incorporate then we use as education (background information) and guidance but not have to use it.

C: It will have to be SIP approved so it will be our program so it needs to be NSR?

Additional discussion on what the implementation criteria that are missing are, that there is no schedule for EPA to finalize these items.

Other discussion on the PAL process and whether it had to be included verbatim or a version incorporated by reference. The PSD version could be incorporated by reference. Noted that this results in a version date in our rule.

Discussion on retention of existing section 112 language. Mr. Cohen pointed out that the language was developed in parallel with section 113 as conditions for sources located or locating in nonattainment areas, whether they were subject to nonattainment NSR or not. Newman noted this was not understood in reading the language but would reread.

Presenter #3: Tom Todd

New Section 036 Non-road Engines Source

C: They are not stationary sources?

A: Yes, but they are portable.

Objectives

- **Ecology is not addressing Portable and Temporary Sources today. We are only considering Non-road Engines.**
- **The current Section 035 does not directly address non-road engines. But they need a regulatory scheme for this class of sources.**

Definition of Non-road Engines

- **WAC 173-400-030(55) will be a copy of the federal definition in 40 CFR 89.2**
- **No change from existing text.**

Applicability

- **We are proposing to exempt units included in WAC 173-400-110 (4) and (5).**
- **Also we propose to exempt any self propelled vehicle and anything that is intended to be propelled while doing its function.**
- **We are interested in engines attached to concrete batch plants, generator farms, etc.; not bulldozers, road scrapers, etc.**

Review of application (1)

- **Must notify permitting agency at least 15 days before operation. Must show compliance with WAC 173-400-112(2)(c) or WAC 173-400-113(3). (Compliance with the NAAQS.)**
- **Permitting authority may set specific conditions, limited to "in-use" conditions, such as hours of operation, fuel types, etc.; but not add on controls.**

Review of application (2)

- **Within 15 days authority must either approve or ask for more info.**
- **-036 orders can be combined with -110 orders.**
- **Orders are appealable to PCHB.**

C: How would it get combined with the 110 order?

A: Two documents would be combined. We might be moving portable sources into 110.

C: Your calendar activities are discretely different. NOC is 30 days, portable source is 15 days. Which date do you use if you combine them?

C: The vision of how we are going to deal with portable and temporary sources. How will we tell them apart?

A: We would create a rule for portable sources. We would also do one for temporary sources in an emergency capacity. No other source category will be approved.

C: EPA turned it down the language the last time they tried to go that way. They said it was enforcement discretion and will be handled at that level.

C: Where did this language come from? How did you come up with?

A: Lynnette wrote up most of the language and Tom made some modifications.

Time Limit

- **An-036 order lasts only 365 days. Any use of this equipment beyond I year becomes a violation of requirement to get a permit.**

C: You should repeat the threshold values here and not just reference section 110.

Closing Remarks:

- Please send comments, options and views about the nonattainment area to Al by August 21, 2009.
- If you have comments on 036 or 107 send them to Tom or Linda.
- Next meeting will be scheduled for the week of August 24 – 28. A doodle poll will be sent out.
- Meeting will meet at SeaTac if possible. The second choice is Matt's office. We can also meet at Weyerhaeuser.

Next meeting:
Portable source proposal

Meeting Adjourned 3:20 pm