



WASHINGTON STATE
DEPARTMENT OF
E C O L O G Y

As required by
WAC 173-400-171

CONCISE EXPLANATORY STATEMENT
AND
RESPONSIVENESS SUMMARY
FOR

Ecology Recommendations
to the U. S. Environmental Protection Agency on
Designations and a Nonattainment Area for the 2006 PM_{2.5} Standard

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Air Quality Program

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CONCISE EXPLANATORY STATEMENT

I. Introduction

Whenever the U.S. Environmental Protection Agency (EPA) sets a new ambient air quality standard, each state has an opportunity to make recommendations to EPA on whether areas meet or fail to meet the new standard. In 2006 EPA strengthened the 24-hour ambient air quality standard for particulates (PM_{2.5}) to improve protection of public health. PM_{2.5} is associated with health impacts that include premature death, increased risk of heart attack and stroke, lung inflammation, reduced lung function, asthma-like symptoms, and asthma attacks. The former 24-hour standard was 65 µg/m³. The new standard is 35 µg/m³.

The Clean Air Act sets out the process for designating areas of each state according to whether or not they meet a new air quality standard. The Act directs EPA to designate areas:

- *Attainment* (that is, meets the standard),
- *Nonattainment* (fails to meet the standard), or
- *Unclassifiable* (not enough information to determine the designation).

The Act provides the state of Washington with the opportunity to submit recommendations for designation to EPA by one year after the adoption of a new standard. Since the new PM_{2.5} standard became effective on December 18, 2006, Washington had until December 18, 2007 to submit its recommendations.

The Clean Air Act directs EPA to consider the state recommendations and designate areas within two years after revision of a standard. When an area has insufficient information to determine the designation, EPA may take an additional year before deciding on the designation.

The Washington State Department of Ecology (Ecology) developed the following recommendations for designations:

Attainment

Lake Forest Park
Seattle Duwamish
Marysville
Ferry Street, Spokane

Nonattainment

L Street, Tacoma

Unclassifiable

Moose Lodge, Vancouver
4th Avenue, Yakima

Ecology based its recommendations on the most recent three years monitoring data (2004-2006) from Federal Reference Method (FRM) monitors. FRM monitors are EPA's official means of

collecting monitoring data for determining compliance with the ambient air quality standard. Compliance with the PM_{2.5} standard is based on three years of data. Ecology used the most recent three years of data to ensure that designations would reflect current air quality.

Attainment

Monitors in Seattle and Lake Forest Park in King County, Marysville in Snohomish County, and Spokane in Spokane County met the standard. Ecology is recommending that the entire counties be designated Attainment.

Nonattainment

A monitor in Tacoma did not meet the standard. Ecology is recommending Nonattainment. EPA requested that any state recommendation for Nonattainment also include a proposed Nonattainment Area Boundary for EPA's consideration. EPA issued guidance specifying nine factors for a state to consider in establishing a boundary. The Puget Sound Clean Air Agency (PSCAA) is the local air quality authority with jurisdiction over Tacoma and Pierce County. PSCAA used the nine factors to develop the nonattainment area for Tacoma proposed to Ecology and brought to public hearing by Ecology (see map). PSCAA's development of the boundary involved meetings and conference calls with agencies and organizations including City of Tacoma, Pierce County, Tacoma-Pierce County Chamber of Commerce, Pierce County Economic Development, Fort Lewis Military Reservation, and McChord Air Force Base.

Unclassifiable

Ecology determined that two areas (Vancouver and Yakima) were Unclassifiable. Monitors in these and other areas nationwide were removed as a cost-cutting measure, because they were not measuring levels near the old standard of 65 µg/m³. The reduction of the standard to 35 µg/m³ raised questions about areas such as Vancouver and Yakima that had measured PM_{2.5} levels near or above the new standard. Monitors at both locations were re-established in January 2007. Ecology is recommending Unclassifiable for the entire counties until sufficient data are collected to designate areas Attainment or Nonattainment.

As required by state rules (WAC 171-400-171), the designation recommendations and proposed nonattainment area were taken to public hearing in Tacoma, Washington on December 5, 2007. The hearing addressed whether the designation recommendations and proposed nonattainment area should be submitted to EPA.

Following the hearing, Ecology considered the comments submitted to the public record and submitted recommended designations to EPA on December 18, 2007. At the same time Ecology made a commitment to submit a proposed nonattainment area for Tacoma to EPA by February 15, 2008.

Ecology submitted the proposed nonattainment area for Tacoma to EPA in February 2008 after further evaluation, consultation with stakeholders, and discussion with PSCAA and EPA. Ecology's Director submitted the designation recommendations and proposed nonattainment area to EPA on behalf of the Governor.

II. Differences Between the Proposed and the Final Submittals to EPA

There are no differences between the recommendations for designations brought to public hearing on December 5, 2007 and those submitted to EPA on December 18, 2007.

Ecology revised the proposed nonattainment area brought to public hearing on December 5, 2007 before submitting it to EPA in February 2008 by making the following three changes:

- Adjusting the northeast boundary to reflect topography
- Removing the City of Tacoma's Point Defiance Park from the nonattainment area
- Revising the western boundary at American Lake to the boundary between the City of Lakewood and North Fort Lewis

Copies of the recommendations and proposed nonattainment area are available from Department of Ecology, P. O. Box 47600, Olympia WA 98504-7600, telephone: 360-407-6830.

III. Responsiveness Summary

The following tables deal with the written and oral comments received for the public record of the December 5, 2007 public hearing. Table 1 provides an index to the comments. Table 2 is Ecology's response to comments. In Table 2, the first column identifies the general subject matter being addressed by the comment. The second column provides Ecology's summary of the comment. The third column identifies the source of the comment. The fourth column provides Ecology's response to the comment.

Table 1. Index to Oral and Written Comments

NAME	AFFILIATION	ADDRESS	COMMENT NO.
Oral Comments			
Gary Brackett	Tacoma-Pierce County Chamber of Commerce, Manager for Business and Trade	P.O. Box 1933 Tacoma, WA 98401	G. Brackett (1), (2), (3), (4), (5)
Greg Narum	Simpson Tacoma Kraft Company	801 Portland Avenue Tacoma, WA 98421	G. Narum (1), (2)
Kimberly Freeman	Pierce County	2401 S. 35 th Street Tacoma, WA 98409	K. Freeman (1), (2), (3)
Sue Mauermann	Port of Tacoma U.S.A.	PO Box 1837 Tacoma, WA 98401-1837	S. Mauermann (1)
Letters and Other Written Comments			
Dale E. Smith		N. 27816 Elk Chattaroy Rd. Chattaroy, WA 99003-8927	D. Smith (1)
Ty J. Gaub	U.S. Oil & Refining Co., Environmental Manager	P. O. Box 2255 Tacoma, WA 98401-2255	T. Gaub (1), (2), (3), (4)
Marilyn J. Peterson		411 So. 61 st St. Tacoma, WA 98408	M. Peterson (1), (2), (3)
Sue Mauermann	Port of Tacoma U.S.A., Director, Environmental Programs	PO Box 1837 Tacoma, WA 98401-1837	S. Mauermann (1)
Debra A. Hyde	Pierce County, Special Projects, Habitat Protection and Restoration	9850 64 th Street West, University Place, WA 98467-1078	D. Hyde (1)
Dan Haire	Attorney at Law	PO Box 8276 Tacoma, WA 98419	D. Haire (1)
Linda Henderson	American Lung Association of Washington, Executive Director	2625 Third Avenue, Seattle, WA 98121-1200	L. Henderson (1), (2)
E-mailed Comments			
Steve T. Kelley			S. Kelley (1)
Donald Bussey		4250 No. Whitman Tacoma, WA 98407	D. Bussey (1)
Memoree C. Cushing		Ellensburg, WA	M. Cushing (1)
Larry Carlson			L. Carlson (1)

NAME	AFFILIATION	ADDRESS	COMMENT NO.
Joy & Jim Brewer		2402 N. Madison St. Tacoma, WA 98406	J. & J. Brewer (1)
Les Lloyd		Spanaway, WA	L. Lloyd (1)
Greg Narum	Simpson Tacoma Kraft, LLC		G. Narum (3)
Karl Anderson	Concrete Technology Corporation, Chairman of the Board		K. Anderson (1)
Susan Ivie			S. Ivie (1)
Robert Baker		Puyallup, WA	R. Baker (1)
Michael Garrity		608 N. Sheridan Ave. Tacoma, WA 98403	M. Garrity (1)
Rick Samyn		Tacoma, WA	R. Samyn (1), (2)
Janet Wise		Bellevue, WA	J. Wise (1)
Gloria Strayer		511 118th Street Tacoma, WA 98445	G. Strayer (1), (2)
Paul Payton On behalf of Linda Henderson	American Lung Association of Washington, Director of Communications	2625 Third Avenue Seattle, WA 98121-1200	L. Henderson (1), (2)
Dan Haire	Attorney at Law	PO Box 8276 Tacoma, WA 98419	D. Haire (1)
Paul Ellis		12508 211th Ave. E Bonney Lake, WA 98391-7429	P. Ellis (1), (2)
Donald G. Tock			D. Tock (1), (2)
Bud Metzger			B. Metzger (1)
Elizabeth J. Warman	The Boeing Company, State and Local Government Relations – NW Region		E. Warman (1)
Bruce Kendall	Economic Development Board for Tacoma- Pierce County, President & CEO		
Ellen & Allen Zulauf		2515 43rd Sty SE Puyallup, WA 87374	E. & A. Zulauf (1)
Derek DeCouteau	Innovative Landscape	Tacoma, WA	D. DeCouteau (1)
Stu Winnie			S. Winnie (1)

Table 2. Responsiveness Summary

SUBJECT OF COMMENT	ECOLOGYS SUMMARY OF COMMENT	COMMENT NO.	ECOLOGYS RESPONSE
Proposed Nonattainment Area	<ul style="list-style-type: none"> Support the proposed nonattainment area boundaries, including industrial areas of Tacoma, to EPA. Include the Port of Tacoma and Frederickson in the nonattainment area—include all polluters. Perhaps we need to regulate wood stoves more, but we shouldn't let any polluters out of the picture. 	<p>M. Peterson (2) J. & J. Brewer (1) L. Lloyd (1) S. Ivie (1) M. Garrity (1) R. Samyn (1) B. Metzger (1) E. & A. Zulauf (1) S. Winnie (1)</p>	<p>Thank you for your support. PSCAA defined the proposed nonattainment area by evaluating 9 factors defined by EPA to identify both the violating area and the areas contributing to the violation. This allows the development of a comprehensive strategy to bring the area into attainment with the PM_{2.5} standard.</p>
Proposed Nonattainment Area	<ul style="list-style-type: none"> Don't allow a nonattainment area that would allow more PM_{2.5} pollution. Put people's health first. Absolutely ALL of Tacoma/Pierce County should be included in the nonattainment designation. Assure cleaner air for health reasons. 	<p>L. Henderson (1) G. Strayer (1) J. Wise (1)</p>	<p>The PM_{2.5} ambient air standard is a federal health standard. PSCAA used the 9 factors defined by EPA so that the proposed nonattainment would be sufficiently large to develop a comprehensive strategy addressing all significant sources in the area violating the standards and the area contributing to the violation.</p>
Proposed Nonattainment Area	<p>Use GIS, not municipal boundaries, to define the proposed nonattainment area. Jurisdictional boundaries are a factor to be considered, not a requirement.</p>	<p>G. Brackett (5)</p>	<p>Ecology used topography to refine the PSCAA recommendation along the Pierce-King County line. As a result, the boundary now includes a small portion of King County.</p>
Proposed Nonattainment Area	<p>Air quality is a regional issue that should be dealt with regionally. Wind blows across city and county lines.</p>	<p>D. DeCouteau (1)</p>	<p>The focus is on the monitor in South Tacoma, because it is the only FRM monitor that is currently violating the PM_{2.5} standard. The proposed nonattainment area covers all the areas that we need to evaluate to develop a comprehensive strategy to bring the</p>

				Tacoma area into attainment with the PM _{2.5} standard.
Proposed Nonattainment Area	Revise the proposed nonattainment to a Pierce County alternative based on wood burning as a primary source of heat and topography.	G. Brackett (4) K. Freeman (1) D. Hyde (1) P. Ellis (1) E. Warman (1)		The proposed alternative addresses only a few of the 9 factors defined by EPA. EPA intended a comprehensive evaluation of all the factors to justify including or excluding areas from the designation.
Proposed Nonattainment Area	Reduce the size of the nonattainment area. Wood smoke is the problem. Wood smoke sources are concentrated in one area of the county.	T. Gaub (3) B. Kendall (1)		While wood smoke is an important cause of the high PM _{2.5} levels in South Tacoma, we need to perform the analysis that occurs as part of attainment planning to develop a comprehensive strategy. Based on monitoring, emissions, and meteorological data, we can't say that the Tideflats don't contribute to high levels in South Tacoma. In addition, Pierce County has other significant sources of PM _{2.5} emissions, including motor vehicles, non-road engines, ships, and outdoor burning. A full analysis of these emissions will allow us to verify the key causes of the high PM _{2.5} levels and develop appropriate strategies.
Proposed Nonattainment Area	Tideflats pollution sources need to be included.	L. Carlson (1) R. Baker (1)		The Tideflats sources are included in the proposed nonattainment boundary.
Proposed Nonattainment Area	<ul style="list-style-type: none"> Exclude the port industrial area from the proposed nonattainment area. Data from the Tacoma Tideflats monitoring station does not support inclusion of the Tideflats in the proposed nonattainment area. 	G. Brackett (2) G. Narum (1) T. Gaub (1) K. Anderson (1)		The monitor in the Tacoma Tideflats shows that PM _{2.5} levels are high. The design value of the monitor is 34 µg/m ³ , which is just below the standard. There is evidence that the Tideflats monitor often tracks the violating monitor when values are high. Wind patterns indicate that winds often blow from the Tideflats toward the violating monitor. Taken

			together, this evidence suggests the Tideflats appears to impact and influence levels at the violating monitor in South Tacoma.
Proposed Nonattainment Area	Future growth at the Port of Tacoma should not be a consideration. PM _{2.5} emissions may be reduced in the future.	G. Brackett (3) T. Gaub (2)	PSCAA based the proposed nonattainment area on an evaluation of 9 factors specified in EPA guidance and not on any single factor.
Proposed Nonattainment Area	Do not ignore air pollution originating from the Port of Tacoma and McChord Air Force Base	D. Hair (1)	The Port of Tacoma is included in the proposed nonattainment area. McChord Air Force Base is not. The Air Force provided PSCAA with emissions data that indicated that the Base was not a significant source of PM _{2.5} . Even if EPA excludes McChord Air Force Base from the designated nonattainment area, development of the plan to bring Tacoma back into attainment can include evaluation and analysis of emissions from the Base as necessary.
Proposed Nonattainment Area	Support exclusion of Fort Lewis and the McChord Air Force Base	G. Brackett (1)	Neither is included in the proposed nonattainment area being submitted to EPA. Both bases supplied PSCAA with information indicating that they were not significant PM _{2.5} sources.
Proposed Nonattainment Area	Be empathetic to Tacoma's past image with regard to air quality and how difficult it was to deal with the problem.	K. Freeman (3)	The PM _{2.5} standard is a federal health standard and is implicated in such health effects as premature death, increased risk of heart attack and stroke, lung inflammation and dysfunction, asthma attacks, and asthma-like symptoms. We recognize that Tacoma has worked hard to reduce air pollution levels. It is only

			because EPA lowered the standard that Tacoma faces nonattainment now. We believe the best way to honor Tacoma's past efforts to improve air quality is to deal with the current issue and protect the health of citizens living and working in the area.
Proposed Nonattainment Area	Don't extend the nonattainment boundaries to get a lower statistical number for demonstrating clean air.	D. Tock (1)	The size of the nonattainment area and the number of PM _{2.5} monitors do not affect determinations of clean air. EPA's data-handling guidelines specify separate consideration of each monitor. Every single monitor must meet the PM _{2.5} standard for an area to be in attainment.
Control of Sources	<ul style="list-style-type: none"> Tacoma could be a model of how to achieve healthy air. Look at the issue of air quality not as a burden, but as a "crisis of opportunity" to do some thinking outside the box. See the challenges as they are and begin addressing them in thoughtful and progressive ways. 	L. Henderson (2) R. Samyn (2)	Thank you for your positive views on improving air quality.
Control of Sources	Washington State is pitching export of advanced air and water pollution control technology to China. Make Tacoma-Pierce County a showcase for developing and applying technology.	M. Peterson (3)	Thank you for your recommendation.
Control of Sources	Pierce County looks forward to partnering with the Puget Sound Clean Air Agency and others on a woodstove change-out program.	K. Freeman (2) D. Hyde (2)	Thank you. We appreciate Pierce County's commitment to dealing cooperatively with other agencies to address wood smoke.

Control of Sources	<ul style="list-style-type: none"> • While wood smoke is the clear, driving cause of nonattainment, the boundary designation process requires consideration of all sources in the Tacoma Tidelands area. • While the Port of Tacoma considers our contribution to be insignificant during periods of wintertime exceedances, we are a part of the community, we contribute particulate matter to the atmosphere, and we intend to continue working with our neighbors to safeguard air quality and bring the region back into attainment. 	S. Mauermann (1)	We appreciate the Port's positive attitude and commitment to cooperatively dealing with air quality issues.
Control of Sources	Heavy smoke permeates the North/West end of Tacoma.	D. Bussey (1)	Wood smoke is widely recognized as an important source of elevated PM _{2.5} concentrations in Tacoma. Wood smoke will be addressed as part of bringing the area back into attainment.
Control of Sources	<ul style="list-style-type: none"> • Air pollution is a multiple, not a single source—wood burning. • If an area of the extended community is polluting the air, clean up those sources • Control industrial sources to cut down on pollution 	M. Peterson (1), (3) G. Strayer (2) D. Tock (2)	Attainment planning will include a comprehensive analysis to determine which sources are significant and which control measures are appropriate.
Control of Sources	Nonattainment will restrict the ability of sources to make modifications in the future. Development options should not be constrained more than absolutely necessary.	G. Narum (2), (3), (4) T. Gaub (4)	Being in a nonattainment area does not affect the ability to make modifications. The permit requirements may differ. PSCAA is researching the specific issues regarding permitting and will respond directly.

Control of Sources	Underwrite landfill tipping fees to maintain at least the current free disposal of yard waste. This supports the ban on burning yard waste throughout the Puget Sound metropolitan area.	P. Ellis (2)	Thank you for your suggestion. In general, Ecology supports the ban on burning yard waste, which promotes healthy air.
Control of Sources	Air pollution is terrible in Graham. How are you helping people who moved into the country to get clean air?	S. Kelley (1)	While Graham is outside the proposed nonattainment area, state and local regulations are in place to protect the public from adverse air quality. Your comment has been forward to PSCAA which has jurisdiction in the Graham area.
Control of Sources	Wouldn't it be wonderful if we could get a woodstove program in Ellensburg?	M. Cushing (1)	Ecology is seeking wood stove change-out funds. While there may not be enough funds to set up a wood stove change-out program in every area that is interested, Ecology commits to using this money wisely.
Control of Sources	People burn when they can get away with it. A telephone number is needed for after-hours, Saturdays, Sundays and holidays for to report burning (legal, illegal, garbage) as well as dust from uncovered truck and trailer loads. Agencies in Spokane County should work together.	D. Smith (1)	Thank you for your suggestion. We are passing along your packet to the Spokane Regional Clean Air Agency, which has jurisdiction over air pollution control activities in Spokane County.

IV. Summary of Public Involvement Opportunities

Ecology held a public hearing on the recommendations for PM_{2.5} designations and a proposed nonattainment area at the Pierce County Library and Administrative Center (PAC Building) in Tacoma, Washington on the evening of December 5, 2007. The public comment period closed on December 10, 2007. Ecology developed a responsiveness summary. The responsiveness summary is available from Department of Ecology, P. O. Box 47600, Olympia WA 98504-7600, telephone: 360-407-6830.

Fifteen individuals attended Ecology's public hearing. Four individuals testified for the public record. Thirty individuals submitted written comments.

The information below provides more detail on Ecology's public involvement activities for the recommendations for PM_{2.5} designations and a proposed nonattainment area:

Public Hearing, December 5, 2007

Notice of Hearing:

- Legal Notices, November 2, 2007, *Seattle Daily Journal of Commerce*, *Vancouver Columbian*, *Tacoma News Tribune*, *Yakima Herald*, *Everett Herald*, and *Spokane Spokesman-Review*.
- Notice of the public comment period and hearing was published in the Public Events Calendar on Ecology's Internet Web site on November 2, 2007
- Notice of Public Hearing, *State Register*, November 21, 2007 (WSR 07-22-049)

Public Hearing:

- The hearing was held at the Pierce County Library and Administrative Center in Tacoma, Washington on the evening of December 5, 2007. Fifteen individuals attended; four testified. The formal hearing began at 7:00 p.m. and ended at about 7:44 p.m.

V. Appendices

Appendix A. Oral and Written Comments

Appendix B. December 5, 2007 Public Hearing Materials

Appendix A. Oral and Written Comments

Oral Comments

Ecology Recommendations on Designations and a Nonattainment Area for the 2006 PM_{2.5} Standard

Public Hearing, December 5, 2007

Thank you very much.

I didn't expect to speak to the audience, but to the other folks, but I'll stay pointed in the way that you want me to. That'll be fine.

(1) For those of you who may not, I'll introduce myself as Gary Brackett. I'm the Manager for Business and Trade with the Tacoma Pierce County Chamber of Commerce. And, first of all, I'd like to offer my thanks to the organizations that have put on this public hearing for the opportunity to speak and to share our perspective and our reasons for those perspectives as this determination is made for the boundaries of the nonattainment area. And, I might also say I give my kudos to the Puget Sound Clean Air Agency, Dave Kircher in the back, Dennis McLerran, as well, who have done an outstanding job in involving the public in a virtual window of opportunity to do so. I know they have been very responsive to us and we're appreciative of that. Along that way, and to the recommendation that's actually has been presented to the Department of Ecology, I would like to express our agreement on the decision to exclude Fort Lewis and McChord Air Force Base from the boundaries of the nonattainment area. Those reasons were documented in the assessment that was given to DOE. We think they're appropriate and we think it was a wise choice on their part. So, we support the continuation of that exclusion for the reasons that were cited in the recommendation to you by the Puget Sound Clean Air Agency.

(2) However, we would like to make some suggestions on refinements in the boundaries that we believe will allow our community to be focused on the actual nature of the exceedance in the clean air standards that are applicable to our community. For instance, we note that the inclusion of the port industrial area. We don't believe it's really supported by the facts that have been shared with the community and in the recommendation to the Department of Ecology. The Clean Air Agency did extensively discuss the episodic events of the week of the last week of '06 for the exceptional circumstances that were there. They noted that a lot of the exceedances were caused following a windstorm when many residences in the surrounding area resorted to wood burning for emergency home heating. If a limited circumstances or limited opportunity to...if exceedances were to apply, it is our understanding that Darrington would also be declared as a nonattainment area.

25 Puget Sound Clean Air Agency also noted that the Alexander Avenue station, with data that does conform with the EPA monitoring criteria has remained in compliance with the new rates, and new levels of microns per cubic meter for the last six years, but just barely. And, if just barely was a criteria for declaring nonattainment, Marysville, Kent and Duwamish would have also been nonattainment areas.

(3) The Clean Air Agency cited the future growth at the Port of Tacoma as a cause for consideration. That might be if the future could be documented as being in nonattainment today. But, in their accounting for the planned initiatives to have further growth in our port industrial area, they've not noted the planned initiatives to reduce the PM 2.5. For example, the Northwest Ports Clean Air Strategy, which is a cooperative effort by the ports of Seattle, Tacoma and Vancouver BC that will be on the agenda and perhaps will be discussed later tonight. No accounting was giving of the forecasted growth of the port activity will perhaps utilize a different mix of conveyances. Perhaps more trains than trucks for cargo than is presently used.

39 Now, there is no definitive understanding in our community of what the consequences of listing us as a nonattainment area will be. The Clean Air Agency has shared with us that they would expect the focus to be not on stationary sources, because they are not producing the exceedances that are being monitored and then perhaps successful permitting for the major or

_____ innovation sources. However, I have seen at least two press accounts where DOE spokespersons have said in the media that it will impact industry. We've been informed that our focus for compliance will probably look at transportation conformity. But, that's unclear to our community. If it's not to be an impact on community, on industry, rather, excuse me, would it be focusing on our cities, our county, our school districts, our utilities, our state and county ferries...all of which have fleets of vehicles using diesel. And therefore, at taxpayer expense, not a private sector expense. What we would request, is for the study on what areas are contributing to the exceedance with which _____ has identified source. Temporary (4) monitoring has included only one site in Lakewood and one site in Puyallup Valley, Chief Leschi School—and one on the South Hill for the last six months. But none have been in the unincorporated areas of Parkland and Spanaway—the source cited, from wind direction, as contributing to the exceedance in South Tacoma. We request that the boundaries that are the sources of wood smoke be evaluated and supportive of the boundaries as suggested by the Pierce County and the report that was made to DOE. That suggestion to us focuses on the problem of wood smoke exceedance and helps our community stay focused in both its interest and its funds to solving the problem that has been identified for our community.

60 Jurisdiction has been presented to us as a factor, not a requirement, so we would suggest that the Clean Air Agency, DOE and EPA use modern tools, such as GIS, instead of municipal boundaries—modern tools that weren't available when the Clean Air Act was initially passed in '63—and, that they help us avoid the broad brush approach and the adverse environmental (5) consequences to our economy and the negative community impact that this designation of nonattainment conveys. Woodstoves and fireplace replacement incentive programs, which is currently underway, is the way that we believe to go that directly addresses the source of our pollution, and we would look to expanding its utilization and encouraging its funding expansion to address the source - or the problem, rather, at its source. Again, my thanks to all of you for hearing my comments and your consideration of these comments.

73 *Hearings Officer*

Thank you very much. I wonder if, in case that noise interrupted the recording, is there a way I could get a copy of your notes?

If there are any problems, let me know.

OK, thank you very much.

(1) Good Evening, my name is Greg Narum. I'm representing Simpson Tacoma Kraft Company, and in a larger sense other industrial concerns on the Tideflats who share concerns about how the boundaries of the nonattainment zone have been defined. As we already heard, under EPA's guidelines, a nonattainment area must include not only the area that is violating the standard but also the nearby areas that contribute to the violation. But, in the case of the Tideflats, the Tideflats do not contribute to the violation on the south part of Tacoma, because the winds at the time of the year when the violations occur are going in the opposite direction. And, so the only reason for including the Tideflats in the designation is the presumption that the area will become nonattainment. As we've already heard, it is not at this time nonattainment, but it is presumed that it might become nonattainment. So we have a concern with this, because although industrial sources have not been identified as a large contributor to the fine particulate status of the area, but they would likely bear the brunt of the impacts. And, for instance, if we want to permit a new project, through the permitting process, any project that could emit particulate matter would have to install lowest achievable emissions technology, which is a very difficult standard in its own right. But, on top of that, we would have to obtain emissions offsets for any new emissions. And basically, there is not a trading mechanism whereby we could take... where we could reduce somebody else's emissions to offset our own. So, basically, we could not... we would be in a very difficult position as far as making any improvements to our mill. In fact, we are working on a project right now that if the timing was difficult, we just couldn't do it. We've actually permitted a co-generation plant that will burn bio-mass fuel to generate electrical power, which I think in today's - with today's concern about global warming, that's be good thing. But, if we were to try to permit that project, and the area had been designated as nonattainment, we would not be able to obtain permits for the project. So, the project would be dead in the water because of the nonattainment status of the area. I don't think that in the large sense that is a good thing.

(2) So we need to be very careful that we don't include areas within the nonattainment area that really, by rights, don't need to be there. And, I think much the same considerations will be echoed by the Port and others of us on the Tideflats.

Again, the two points that stick out are that we do not contribute to the nonattainment status of the south part of Tacoma, and secondly, it is not by any means a sure thing that the area will become nonattainment on its own right. And so we should proceed carefully, being conscious of the fact that although industrial facilities are not large contributors amounting to about 10% of the fine particle emissions, they would be greatly affected in terms of the ability to get permits for future development on the Tideflats.

Thank you for your attention. And, I'm quite impressed by the turnout at this hearing, by the way. Very good to see that. We went through a similar process in the early 80s involving Doug Schneider, I remember, having to do with PM₁₀. So, here we are again, very successfully concluded at that time... on that occasion, industrial sources were a major contributor to PM₁₀ emissions.

Hearings Officer

Thank you.

Did anybody else decide they want to do formal testimony?

We have Kimberly Freeman.

Yes, good evening. I'm Kimberly Freeman, and I'm here on behalf of Pierce County. I believe the Department of Ecology received what the recommendation from the Air Agency, recommendation from Pierce County as well for a nonattainment area. And, I'm here tonight to reiterate Pierce County's suggested nonattainment area. My testimony will be followed by a letter later on this week. The area that Pierce is suggesting - and I'm sorry I don't have a map tonight - but the area that we are suggesting for a nonattainment is based on work by the Air Agency. Their work that demonstrates that the elevated levels of PM 2.5 at the South Hill monitor are largely caused by residential wood heating. The indications of this are of course when the standard is exceeded it is exceeded in the winter time and it is exceeded at times of air stagnation or inversion. What we did was, we looked at the census block information, in terms of which census blocks use woodstoves as their primary source of heat, and we overlaid that with topographic information. And, we were able to identify an area within which to focus implementable solutions. We believe that specifically identifying the area that is contributing to this monitor allows Tacoma and Pierce County to work in conjunction with other agencies to achieve success in improving air quality in these neighborhoods quickly, rather than diffusing the problem and solutions slowly over time.

(1) We ask that the Department of Ecology seriously consider our reasons for focusing on a specific smaller area that contributes to the South Hill monitor as proposed in our maps. First, there are three monitors in the Tacoma/Pierce County area only one of which is out of attainment. Secondly, a wood smoke problem is addressed very differently than an industrial problem or a transportation problem or a diesel problem. And, in fact, the Air Agency has had great success in Darrington and other communities working on wood stove changeout programs and we would welcome the opportunity to partner with the agency in implementing a similar program within the suggested nonattainment area. We also would ask both the Air Agency and the Department of Ecology to be empathetic to the history of Tacoma and Pierce County and some of the images and things that we've come through and that we've fought hard to kind of walk away from and improve and to just be mindful of that through this process. And, finally, we would really like to partner with the Air Agency and DOE and City of Tacoma and other agencies to aggressively address the problem at the South Hill monitor and then build upon those relationships and those partnerships and to quickly and aggressively address our larger urban air quality to improve it as quickly as possible. Thank you.

Hearings Officer

So, we have one last person unless anybody else has changed their mind.

OK. Last but not least, Sue Mauermann.

Thank you, Sue.

Good evening. My name is Sue Mauerman and I'm the Environmental Director for the Port of Tacoma. I want to follow Gary Brackett's lead and really thanking the Puget Sound Clean Air Agency who took special effort to come talk with the Port of Tacoma. Thank you very much, Dave for sitting down and walking through your thought process and listening to our concerns.

And, I also want to empathize with my friends at the Department of Ecology, who face these kinds of difficult issues, hear different perspectives and need in the end to make a decision that meets the federal guidelines. And, I also am really pleased to be actually be able to follow one of our neighbors on the Tacoma Tideflats who really has shown great leadership in improving the air quality related to Tideflats emissions, so we feel together as part of the Tideflats family that the Port of Tacoma, Simpson and other commercial and industrial processes on the Tideflats really do our part related to air quality. In Pierce County, frankly, we're really fortunate that we can resolve nonattainment by addressing a single issue, and that's wood smoke— wintertime wood smoke. We know that it's very difficult, and an unpopular issue, but if we eliminate wintertime wood smoke, frankly our region would have some of the best urban air quality in the country. But, even though wood smoke is the clear driving factor related to nonattainment, we realize that there are documented PM₁₀ sources in the tide flat area and that the EPA's boundary designation process, as John described, requires those sources to be considered, all contributed areas.

(1)

Based on the Puget Sound Clean Air Agency's 2005 particulate matter inventory in Pierce County, Port of Tacoma activities contribute 2% of annual particulate matter emissions. And, a smaller percentage, frankly, if you view that from wintertime peaks brought about by wood smoke. So if you're looking at a peak condition, that means that our contribution is even tinier. I don't know what fraction, but it's far less than 2%. In fact, if you take a look at one particular event in Port history, in 2002, when our workers went on strike and the Port essentially closed down for 8 days, there were no discernible changes to the particulate levels measured at the continuous monitor located in our own backyard.

And so, as Doug was showing us the pictures of the various monitors and we've heard that the Alexander monitor is just barely on the below nonattainment area, all of those monitors, no matter where they are, show the same significant pattern of wintertime peaks which come from wood smoke. And, they track closely with cold temperature, so that's why we know they come from wood smoke. And, data that comes from the Puget Sound Clean Air Agency have shown that the chemical composition of the peaks is consistent with a dominant wood smoke source. Nevertheless, while we consider our contribution to be insignificant during those periods of wintertime exceedance, we are a part of the community, we do contribute to PM in the atmosphere and we intend to continue to work with our neighbors to safeguard air quality and bring the region into attainment. We've focused on diesel particulate matter, which is a subset of the overall concern that's being raised by the exceedances at the monitor. We've focused on diesel particulate matter in our emission reduction efforts in order to safeguard the health of those who spend so much time on the Tideflats working adjacent to port operations. And, we've made great strides through both our own efforts and the efforts of our customers and our tenants who really have done marvelous things. Gary mentioned the Puget Sound Clean Air Strategy, being a basis for a number of the efforts we've undertaken. We've developed that in concert with the Port of Seattle, on the Vancouver/Frazier Port Authority and with direct involvement and great deal of thanks to the efforts of the state and regional Clean Air Agencies. This strategy is designed to allow the Ports to grow as planned while achieving significant emission reduction efforts.

(1)

So, for example, even right now, before the plan has even been adopted, we use low sulfur fuels in all of our terminal equipment, and many of the ships at berth burn low sulfur fuel in their auxiliary engines, because they're such a significant contributor to diesel particulate matter without that low sulfur fuel. We are creating newer, cleaner more efficient fleets of equipment in the Tideflats and are considering emerging opportunities for zero emission electric equipment. So, let me just summarize by saying that through our efforts with diesel particulate matter, we feel like we're doing our part and more to reduce overall PM. We want to remain a leader. We want to work in partnership with the County, the City, our industrial partners, state and regional air agencies to reduce overall PM and we intend to remain a leader through innovative approaches and undertaking things that satisfy both the needs of our businesses and the health of the region together. Thank you.

Hearings Officer

Anybody else want to come up?

OK

So, I'm going to finish up here. All testimony received at this hearing as well as any other hearings that might have been connected to this, which there weren't any, held in Tacoma/Pierce County library along with all written comments received by the 10th of December, will be part of the official hearing record for this proposal.

The next step is adoption. The agency director or his or her designee will look at public comment, the responsiveness summary, and staff recommendations and will make a decision about adopting the proposal. Adoption is currently scheduled for December 18th and the decision, of course, will be earlier than that. If we can be of further help, please don't hesitate to ask. Doug, of course, is the technical person you would want to touch base with at Ecology. Mr. Anderson would be at Puget Sound Clean Air. I notice they both have business cards at the back of the room.

On behalf of the department of Ecology, thank you for attending this evening. We certainly appreciate your cooperation and courtesy. Let the record show this hearing is adjourned at 7:44. Thank you very much.