

## **SSM Stakeholder Meeting**

October 18, 2017

1:30 pm – 3:30 pm  
Ecology Headquarters  
Auditorium  
300 Desmond Drive  
Lacey, WA 98503

### **Agenda**

Review changes to rule

- Definitions
  - Aligned definition of hog fuel and wood-waste with definitions in Chapter 173-400 WAC
- Nonroad engines
  - Removed provision that would have applied to Hanford and Dept. of Defense facilities because excluding engines smaller than 50 brake horsepower for these sites inadvertently resulted in requirements that were more stringent for private entities.
- Existing exemptions will remain until EPA removes them from the SIP.
- New alternative standard will go into effect when EPA includes them in the SIP.
- Wood-fired boiler:
  - Added provision to clarify that new opacity standard applies to an existing boiler, that is one in operation before January 24, 2017.
  - Clarified that only clean fuels can be used in the boiler to use the alternative standard.
  - Listed the records that must be maintained to clarify exactly what those are.
- Furnace refractory
  - Should we delete term “existing” or add a date to clarify when existing applies?
- Sulfur dioxide emission standard – on hold waiting for results of modeling of all five oil refineries
  - Alternative sulfur dioxide standard: SO<sub>2</sub> from a sulfur recovery unit incinerator stack must not exceed a one hour average of 2500 ppmdv corrected to seven percent oxygen
  - Clarified that the time period for the alternative standard is :”clock-hours” to set the time as three distinct 6-minute periods rather than continuous or rolling.
  - EPA asserted that determining compliance using an engineering calculation methodology approved by a permitting agency relies on impermissible director’s discretion. To use this option instead of continuous emissions monitor, EPA must approve the methodology in the SIP.
- Section 107 (excess emissions) remains in effect until EPA removes it from the SIP.
- Section 108 goes into effect on the effective date of EPA’s removal of Section 2017 from the SIP.
  - Added flexibility to provide other relevant evidence instead of signed, contemporaneous records to document response to an excess emissions event.

- Section 109 goes into effect on the effective date of EPA's removal of Section 2017 from the SIP.
- Public notice
  - Added requirement to post notice by noon to be considered the first day of the public comment period.
  - Clarified that if a **Washington** state holiday falls within the public comment period, the holiday is not one of the thirty day.

Relationship to other air agency rules

Other topics?

**Proposed rulemaking schedule**

Propose rule: January 24, 2017

Hearing dates: February 7 and 8, 2018

Comment period closes: February 15, 2018

Possible adoption date: early summer 2018