

# Rulemaking for Air Quality in Overburdened Communities: Introduction to Emission Sources

Chapter 173-448 WAC  
March 6, 2025



# Welcome



# Let us know...

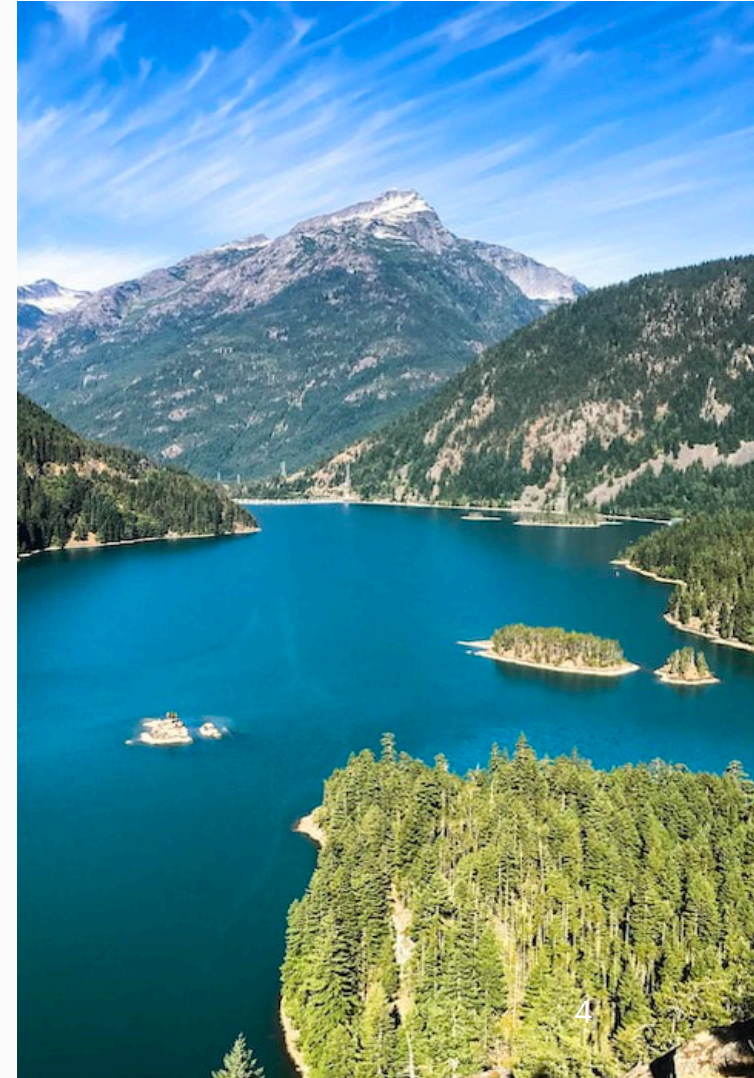


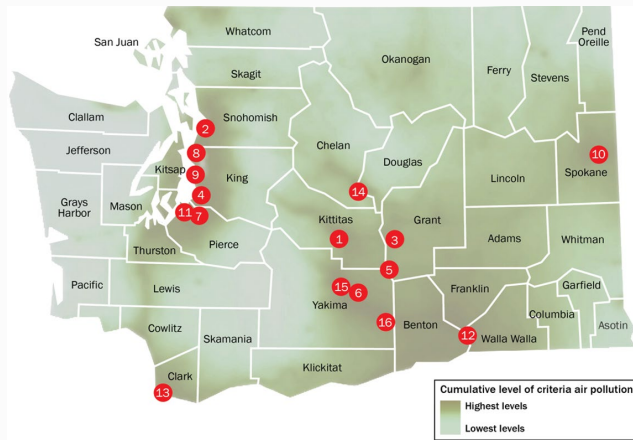
How did you hear about this meeting?

# Improving Air Quality in Overburdened Communities Highly Impacted by Air Pollution

Ecology is engaging with 16 overburdened communities and interested tribes to improve air quality

- Expanding air monitoring
  - Includes \$10M for high-resolution study
- Adopting strategies to reduce air pollution
  - \$10M community grant program in 2024
  - Rulemaking in 2024-26 about more protective air quality standards
- Evaluating and reporting air pollution, greenhouse gases, and health data every two years
  - First report released in December 2023

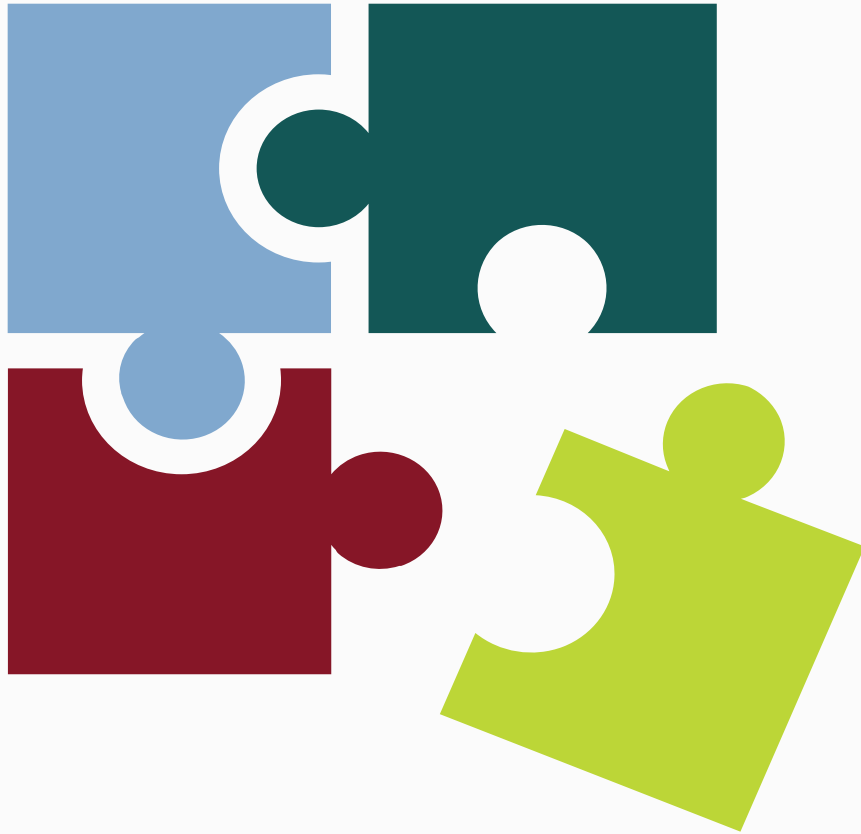




# Multiple efforts go into improving air quality



# Rulemaking Considerations Related to Improving Air Quality in Overburdened Communities Highly Impacted by Air Pollution



- Identifying sources
- Establishing targets
- Developing emission reduction strategies
- Determining options for stricter standards or emission limits

# Rule Development Process

Public workshops discuss initial concepts

Preliminary draft(s) – inviting informal comments

Draft rule (proposal) public comment period and public hearing

# Rulemaking Timeline



Future topics and dates are tentative.



# Ecology Staff

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Facilitator

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Technical Host



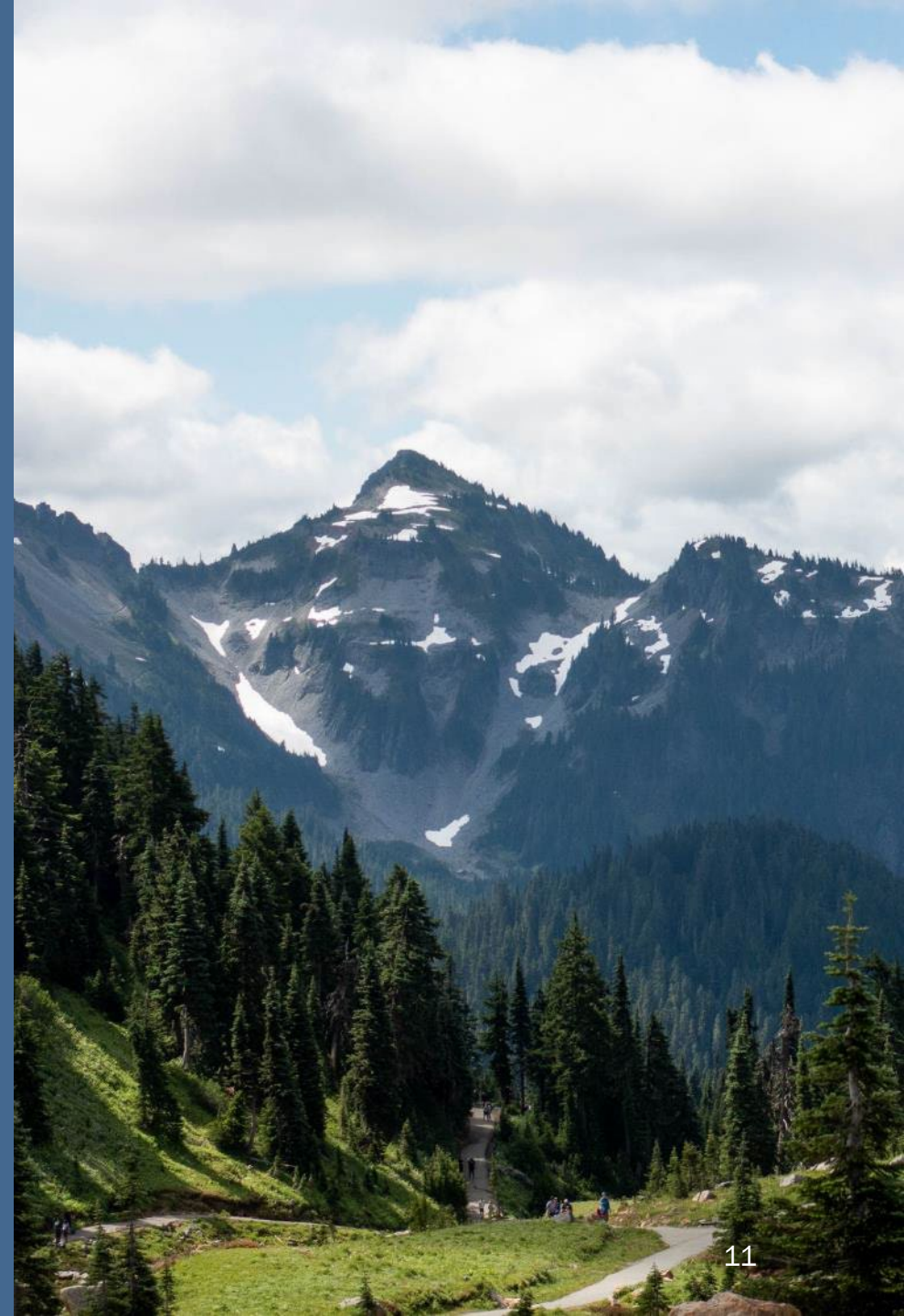
# Agenda

- December 2024 meeting discussion summary
- Scope of pollutants
- Air quality and emissions data sources
- Scope of emission sources
- Q&A



# December Meeting

Discussion summary



# What We Heard

Applicability

Emission  
standards

Emission  
reductions

Emission  
sources

Suggestions

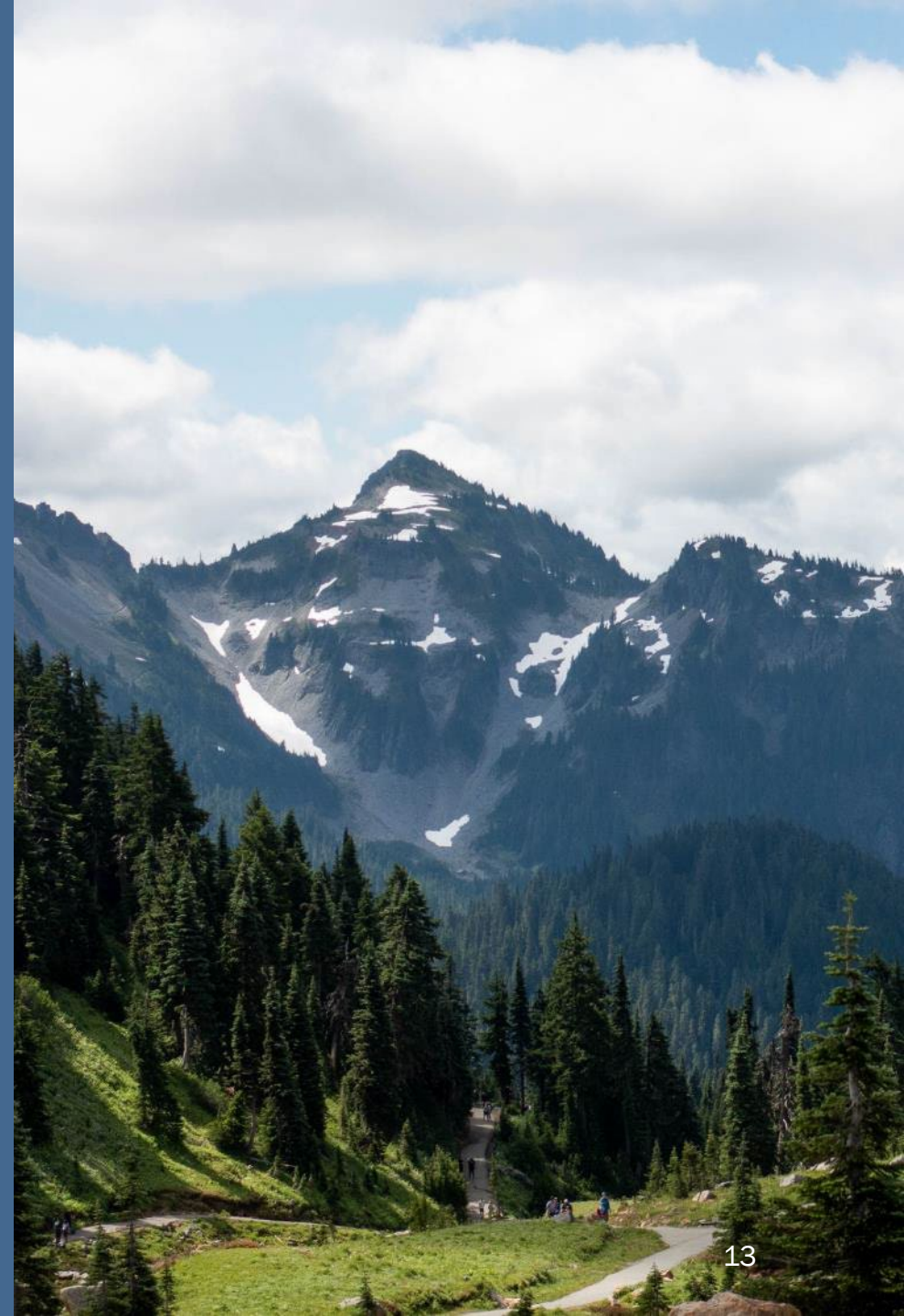
Challenges

Monitoring

Public input



# Scope of Pollutants



# Scope of Pollutants

“Adopt along with local air pollution control authorities, stricter air quality standards, emission standards or emissions limitations on **criteria air pollutants**, consistent with the authority of the department provided under **RCW 70A.15.3000**, and may consider alternative mitigation actions that would reduce criteria pollution by similar amounts...”

RCW 70A.65.020(2)(b)(iv)

# Criteria Air Pollutants



## Particle Pollution

Tiny solids or liquid drops floating in the air.

### Sources:

- Wood stoves and fireplaces
- Outdoor burning
- Dust from construction and agriculture
- Wildfires



## Ground-level Ozone

Contributes to smog. Forms when some air pollutants react with each other in sunlight and hot weather.

### Sources:

- Cars
- Industry



## Carbon Monoxide

Odorless, tasteless, colorless gas from combustion.

### Sources:

- Cars
- Wood stoves and fireplaces
- Outdoor burning
- Industrial combustion



## Sulfur Dioxide

Forms when fuel that contains sulfur is burned.

### Sources:

- Industrial facilities (like fossil fuel power plants, pulp mills)
- Ships and locomotives



## Nitrogen Dioxide

Produced when fuel burns. Highest levels are near roads.

### Sources:

- Cars
- Ships and locomotives
- Industrial power plants



## Lead

Lead was an air quality problem. Today, all of Washington meets the air quality standard for lead.

### Source:

- Metal and ore processing facilities

Criteria air pollutants

# How Criteria Air Pollutants are Regulated



Criteria air pollutants are listed and regulated under section 108 of the federal Clean Air Act.



EPA sets National Ambient Air Quality Standards (NAAQS) for these pollutants.



Ecology works to meet the NAAQS and can set stricter air quality standards in Washington.



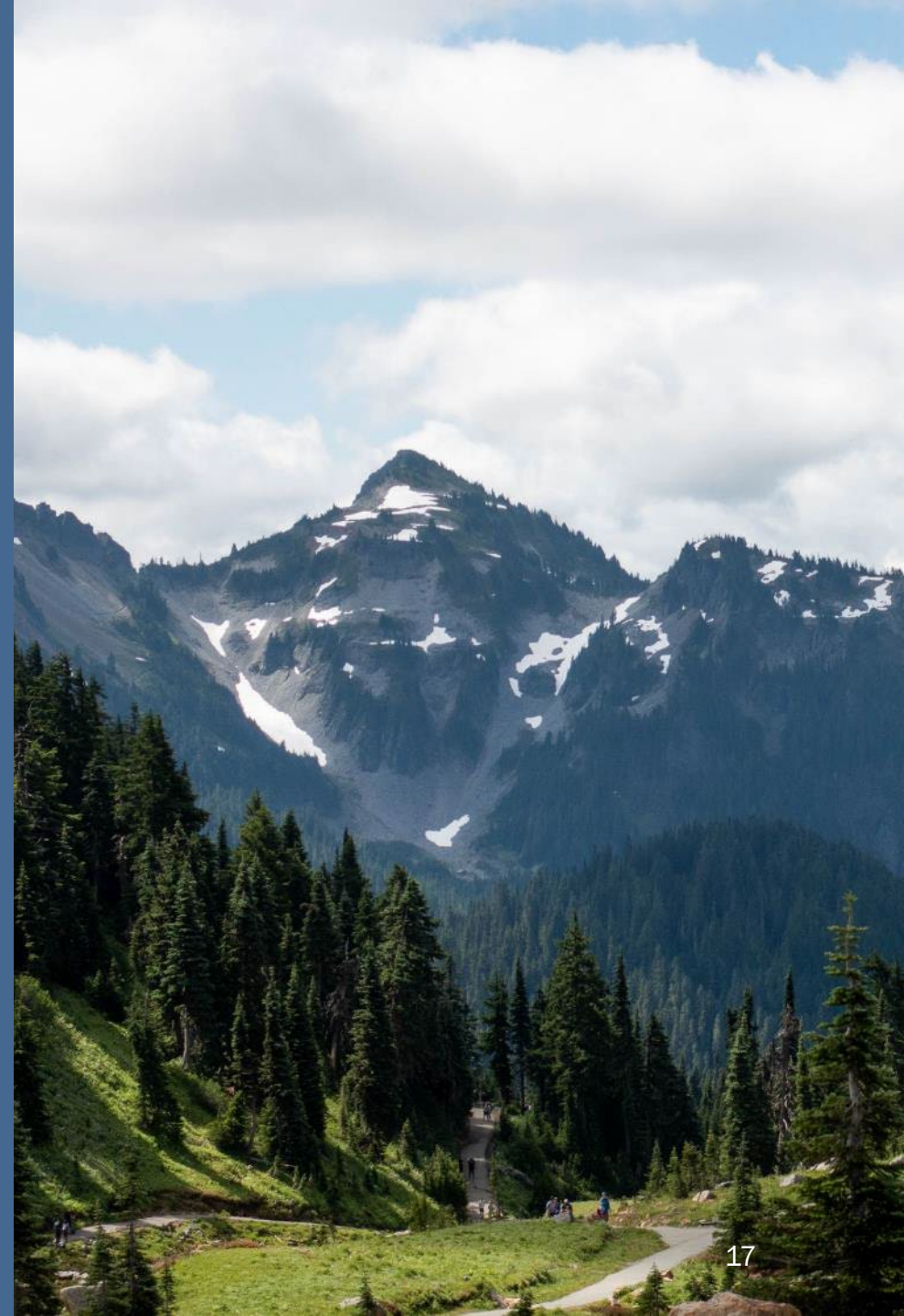
Washington is currently in attainment of the NAAQS.

NAAQS





# Air Quality and Emissions Data Sources

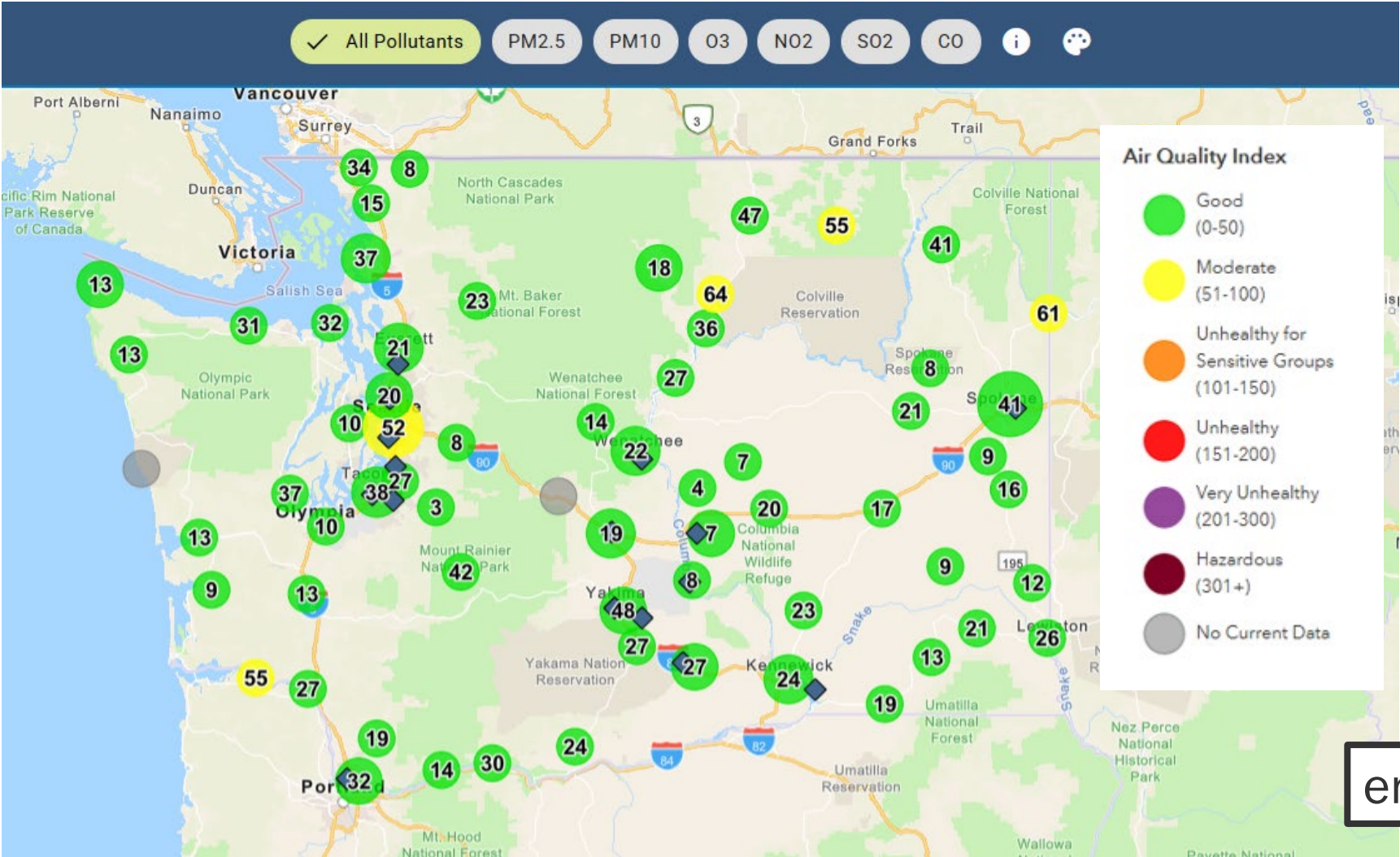


# Air Quality Monitoring



Air quality monitoring involves measuring pollutant concentrations in the air.

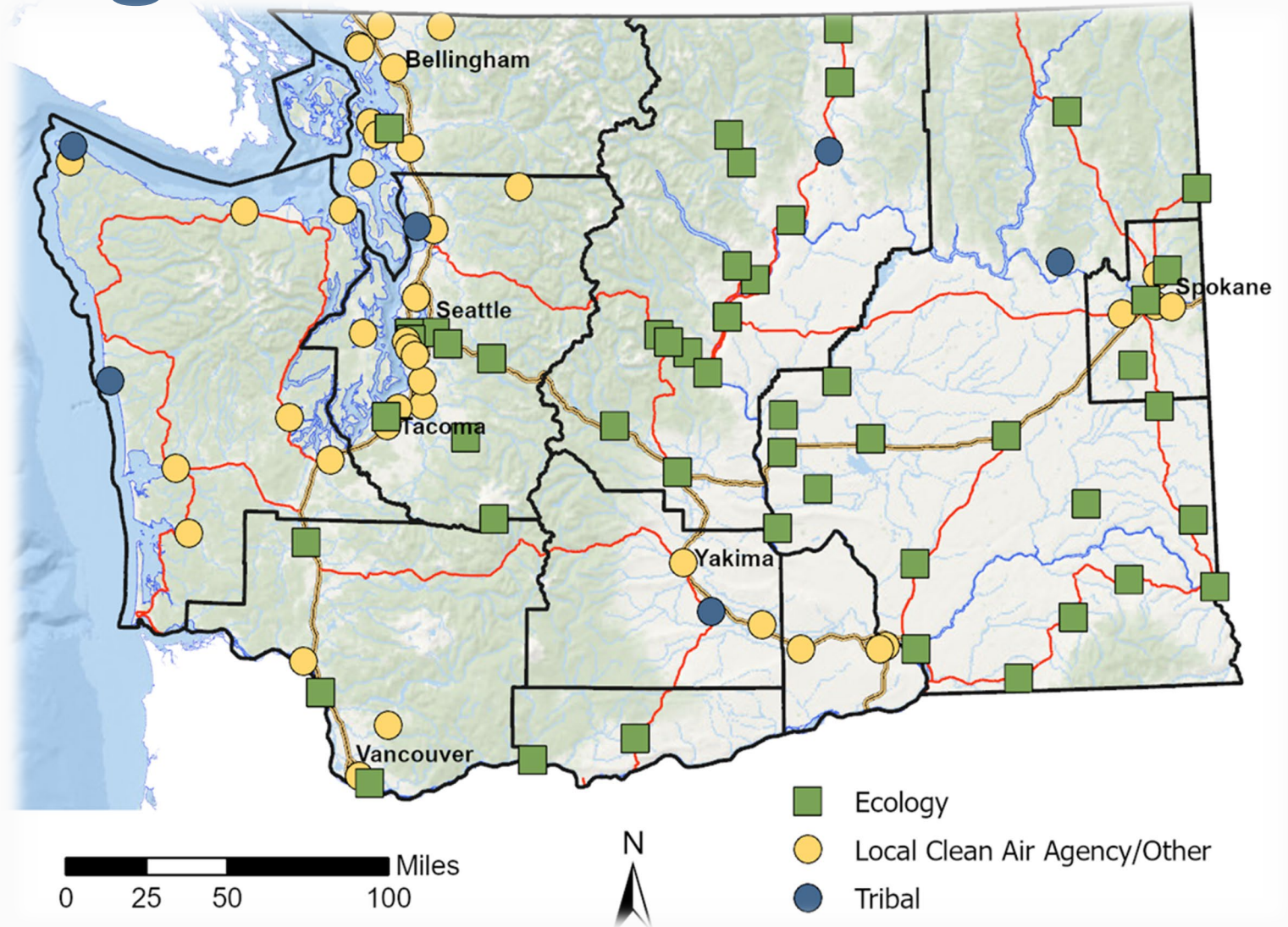
# Washington's Air Monitoring Network



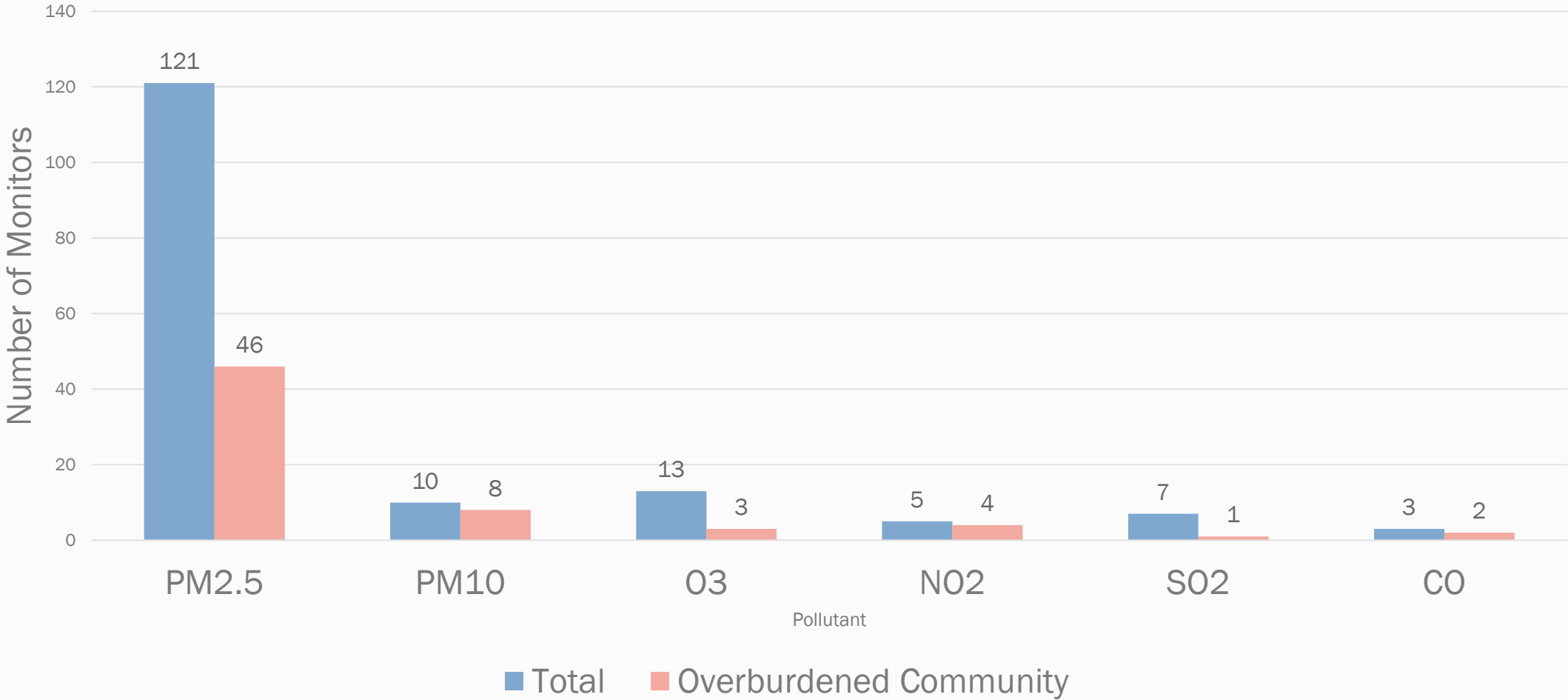
[enviwa.ecology.wa.gov](http://enviwa.ecology.wa.gov)

# Expanding Washington's Air Monitoring Network

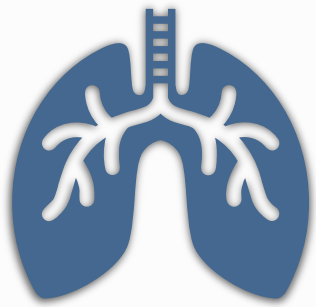
- Ecology and our partners monitor criteria air pollution at **121 monitoring sites**.
- We are adding **new sites and monitors** in all 16 overburdened communities.



# Monitoring Coverage by Pollutant



# Monitoring Data Appropriate Uses



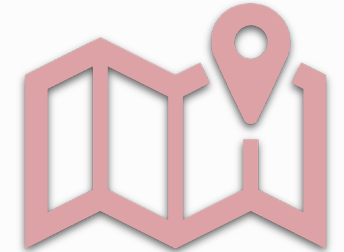
Assess air quality impacts on human and environmental health



Inform policies to reduce air pollution, and track trends over time



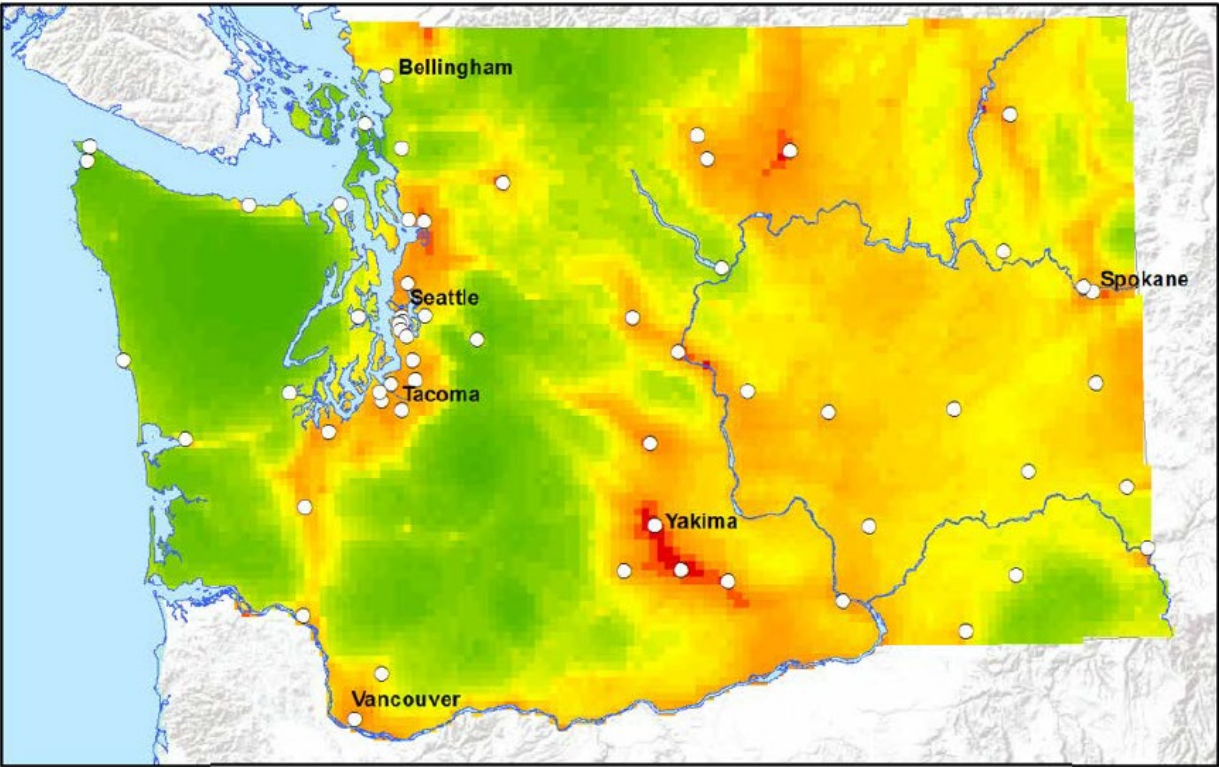
Monitoring data to track compliance of the NAAQS



Map monitoring data and model output

# Air Quality Monitoring Example Output

PM<sub>2.5</sub> map monitoring data + model output



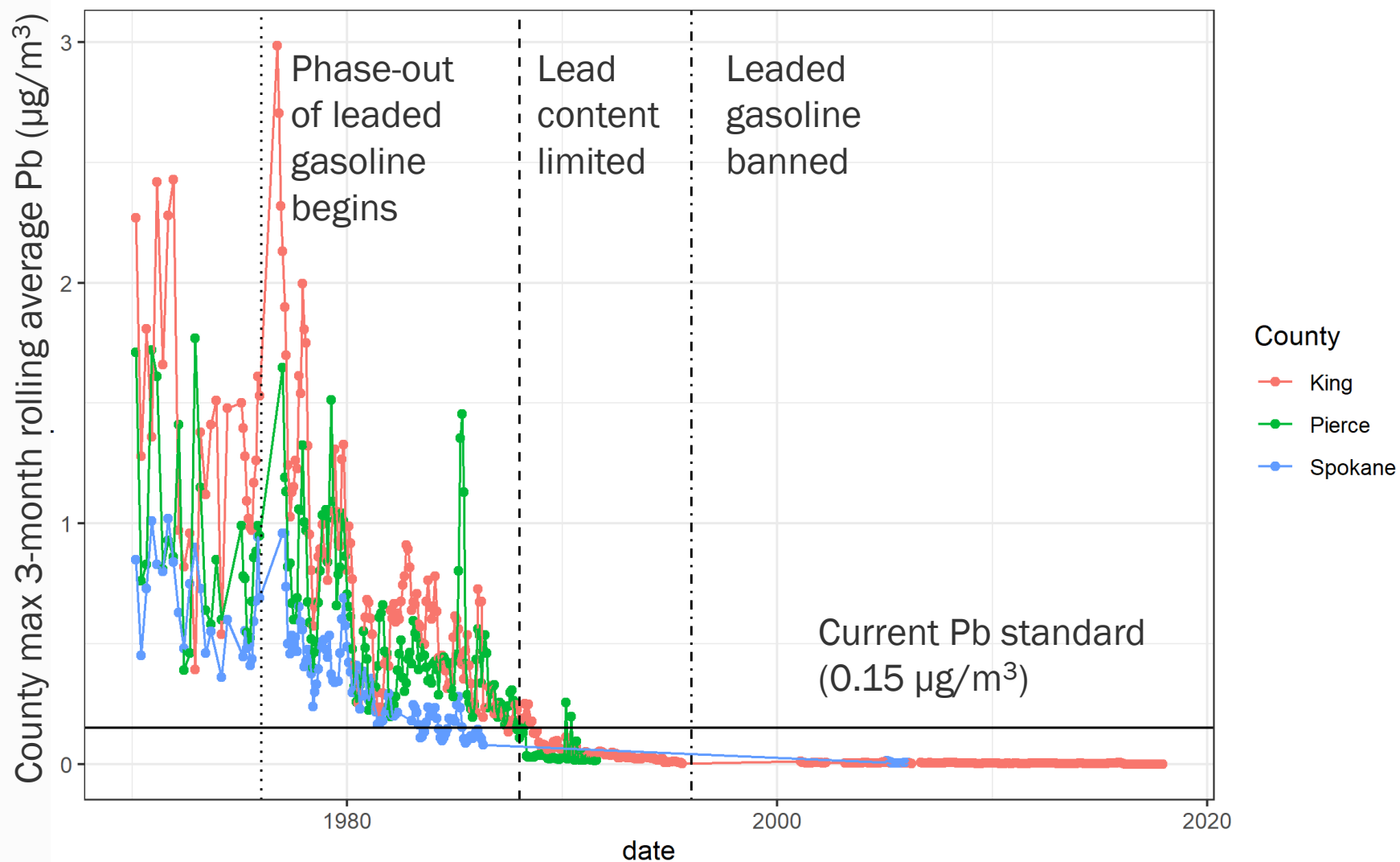
0 25 50 100 Miles



Good Moderate USG Unhealthy  
( $<12.1 \mu\text{g}/\text{m}^3$ ) ( $12.1\text{-}20.4 \mu\text{g}/\text{m}^3$ ) ( $20.5\text{-}35.4 \mu\text{g}/\text{m}^3$ ) ( $>35.4 \mu\text{g}/\text{m}^3$ )

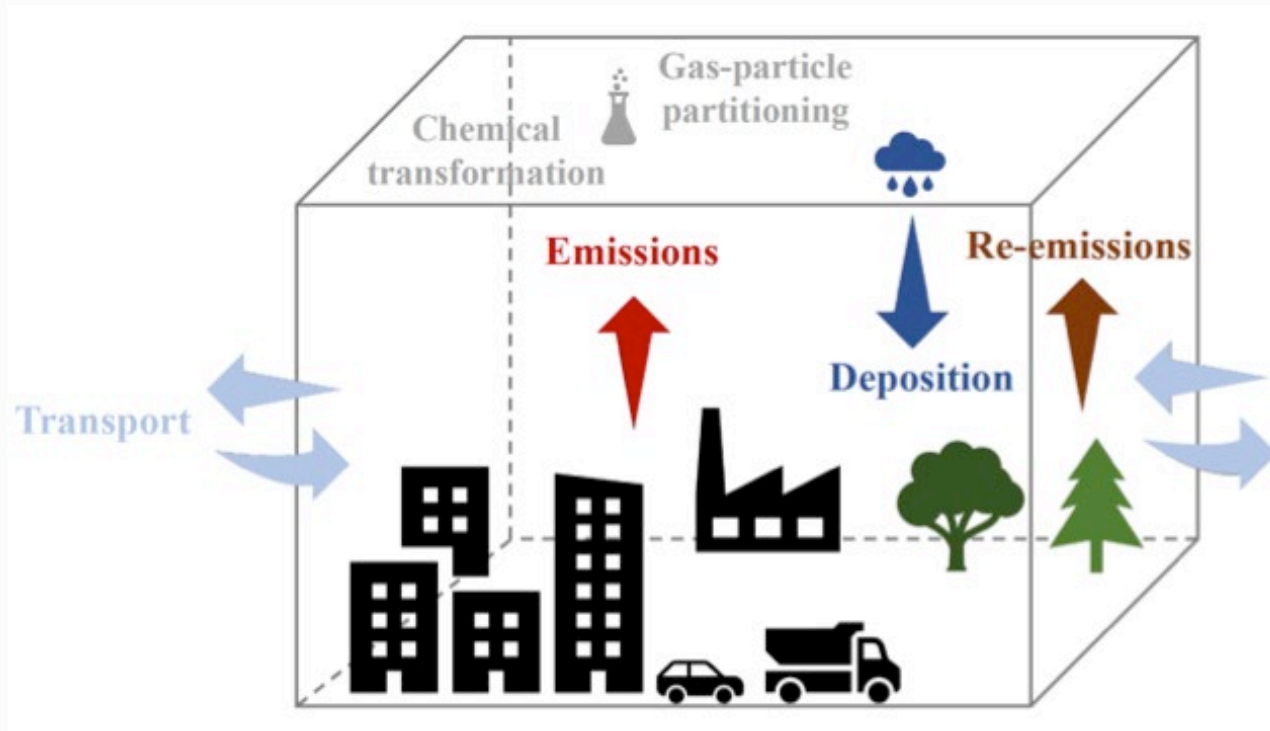
# Air Quality Monitoring Example Output

## Measuring the effectiveness of lead policy





# Air Emissions Inventory



An emissions inventory estimates the amount of pollution that comes directly from a source each year. It does not consider transport or chemistry.

# Comprehensive Emissions Inventory

## National Emissions Inventory (NEI)

- Coordinated between EPA and states
- 3-year process to estimate all source categories

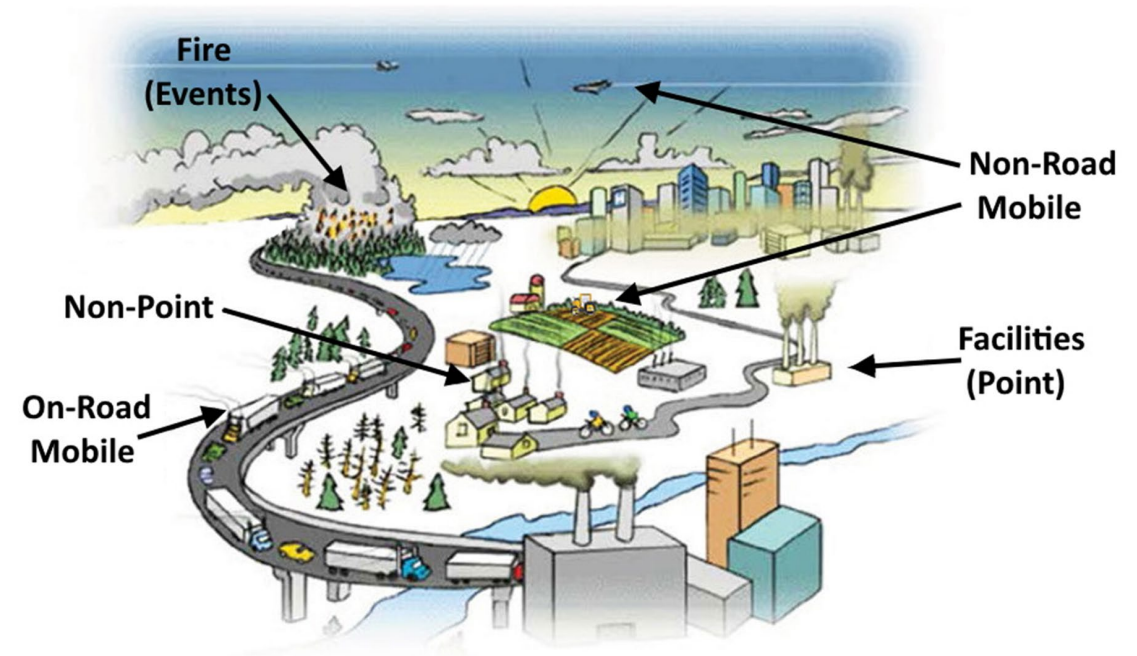


Illustration showing source categories that are covered by emissions inventories. Biogenic sources are also included.

# Point Source Air Emissions Inventory

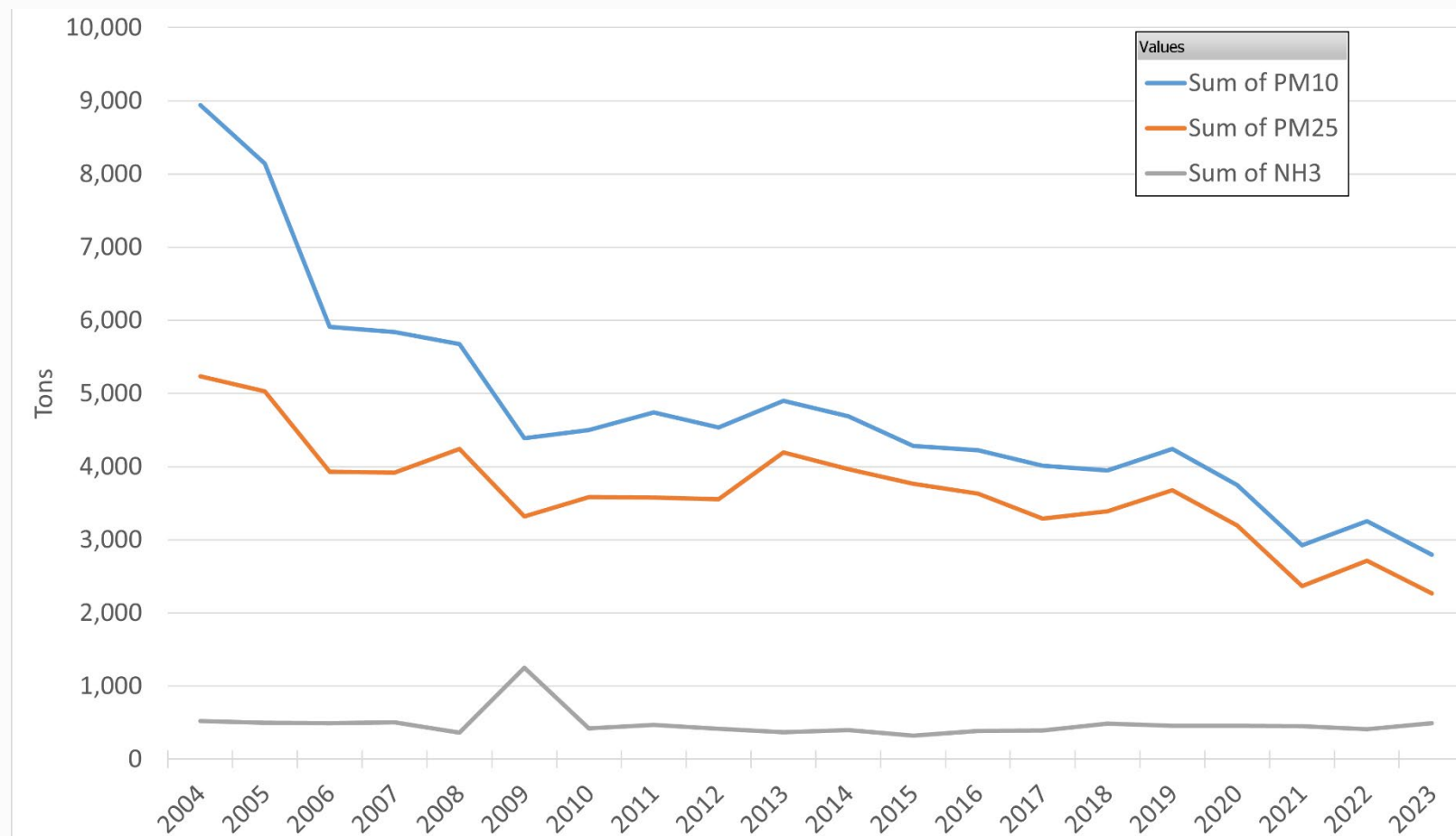
- Permitted sources emissions inventory
  - Emissions reported annually by Title V sources
  - Included in the NEI
- Registered sources emissions or activity
  - Sometimes only reported every 3rd year
  - Not reported to the NEI

# Emissions Inventory Data Uses

- Air quality planning and rulemaking
- Calculating fees for permitted sources
- Screening which levels of sources to focus on
- Mapping sources of pollution
- Air quality modeling

# Emissions Inventory Example Output

## Total Reported Emissions (PM and NH<sub>3</sub>) All Major Sources



## Monitoring

Measuring pollutant concentrations  
(example: parts/million)  
in the air

Pollutants include:  
PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>,  
CO, NO<sub>2</sub>, ozone

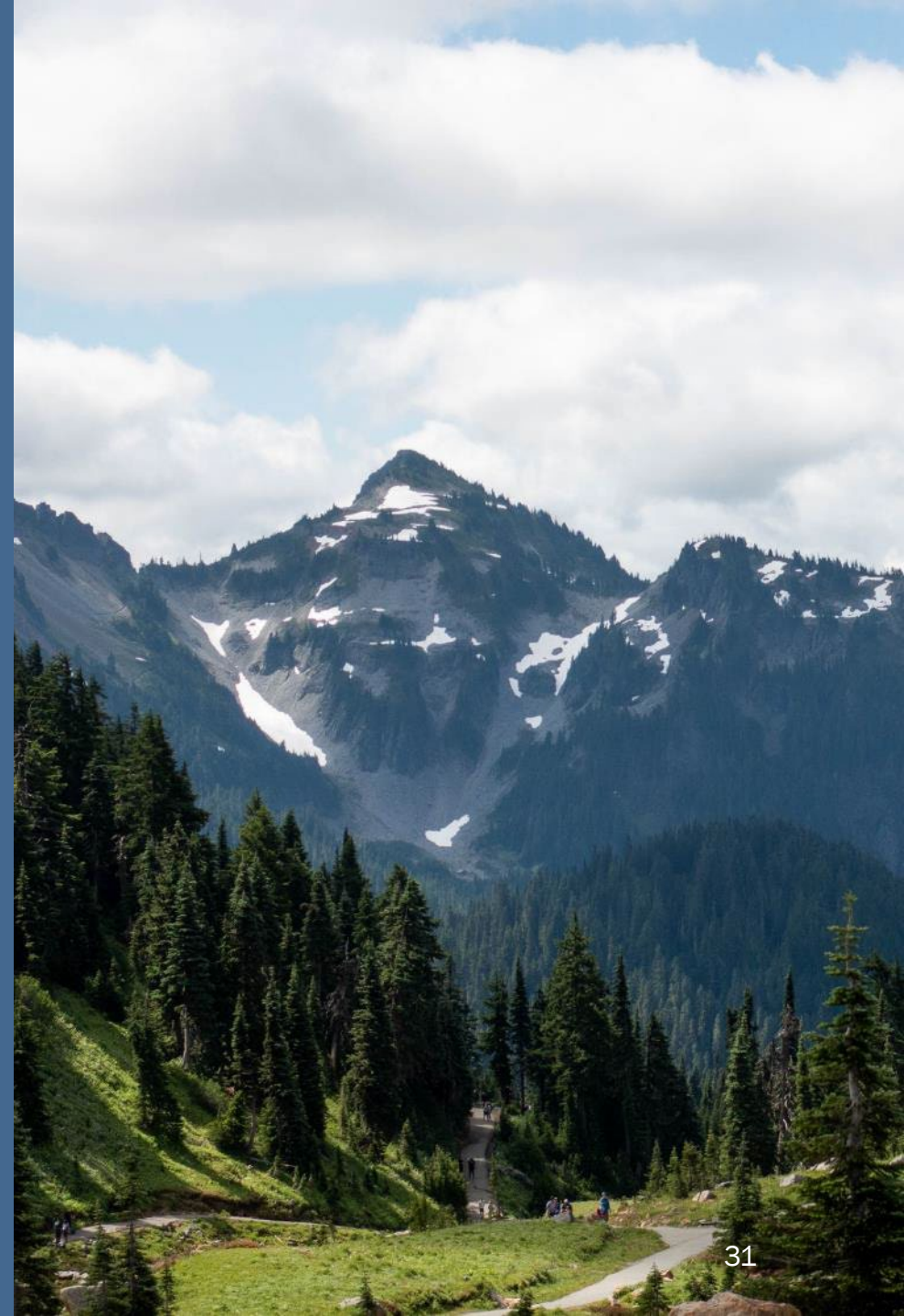
## Emissions Inventory

Estimating pollutant emissions  
(example: tons/year)  
from a source

Pollutants include:  
PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>,  
CO, NO<sub>x</sub>, VOC, NH<sub>3</sub>



# Scope of Emission Sources



# Using Air Quality and Emissions Data



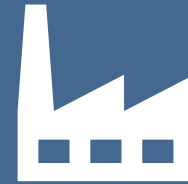
Determine greatest contributors and list high priority significant emitters.

RCW 70A.65.020(1)(c)(i)



Track sources with emissions that are staying the same or increasing.

RCW 70A.65.020 (2)(b)(ii)



Notify sources about enforceable orders.

RCW 70A.65.020 (2)(b)(v)



Emissions reductions need to be proportional to a permitted sources contribution.

RCW 70A.65.020 (2)(c)



# Spokane County PM<sub>2.5</sub> Emissions Inventory (2020)

| Category  | PM <sub>2.5</sub> (Tons) |
|---|--------------------------|
| Residential wood combustion                                       | 1,146                    |
| Road dust   | 844                      |
| Construction dust   | 799                      |
| Agricultural dust   | 504                      |
| Commercial cooking  | 331                      |
| Residential outdoor burning                                       | 131                      |
| On-road mobile vehicles   | 126                      |
| Institutional/commercial / industrial fuel combustion (non-point) | 125                      |
| <b>Major Sources (point)</b>                                      | <b>111</b>               |
| Wildfires   | 106                      |
| Non-road mobile vehicles (not elsewhere classified)               | 93                       |
| Prescribed burning  | 78                       |
| Livestock dust  | 68                       |
| Locomotives   | 32                       |
| Miscellaneous   | 27                       |
| Agricultural burning  | 22                       |
| Aircraft landing/takeoff  | 8                        |
| Recreational boats  | 5                        |
| Residential fuel use (non-wood)                                   | 4                        |

## Major Sources PM<sub>2.5</sub> Emissions

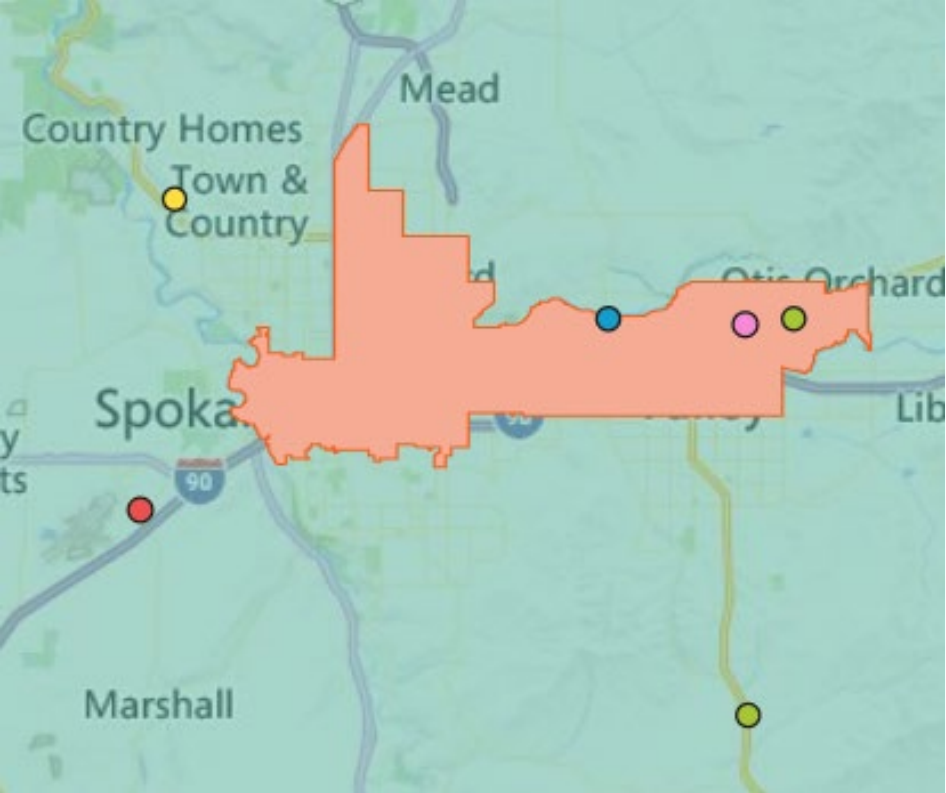
| Major Source                         | City    | 2020 (Tons) |
|--------------------------------------|---------|-------------|
| Inland Empire Paper                  | Spokane | 52          |
| Kaiser Trentwood                     | Spokane | 36          |
| Mutual Materials                     | Mica    | 6           |
| Gas Transmission Northwest Station 6 | Rosalia | 4           |
| Waste To Energy                      | Spokane | 5           |

## Non-Major Registered Sources PM<sub>2.5</sub> Emissions

- 355 of 600 in Spokane County report PM emissions
- 200 tons total of PM<sub>10</sub> (but mostly dust/coarse, not PM<sub>2.5</sub>)
- 9 sources emitting more than 5 tons of PM<sub>10</sub> per year

Total primary PM<sub>2.5</sub> emissions in Spokane County = **4,560 tons**

# Spokane and Spokane Valley Overburdened Community with Major Point Sources



 Spokane and Spokane Valley  
Overburdened Community

**Total PM<sub>2.5</sub> Emissions (all sources) in  
Spokane County = 4,560 Tons**

## Major Sources PM<sub>2.5</sub> Emissions

| Major Source                         | City    | 2020<br>(Tons) |
|--------------------------------------|---------|----------------|
| Inland Empire Paper                  | Spokane | 52             |
| Kaiser Trentwood                     | Spokane | 36             |
| Mutual Materials                     | Mica    | 6              |
| Gas Transmission Northwest Station 6 | Rosalia | 4              |
| Waste To Energy                      | Spokane | 5              |

# Scope of Emission Sources Continued

... the department will engage with overburdened communities and vulnerable populations in:

- (i) Identifying **emitters** in overburdened communities; and
- (ii) Monitoring and evaluating criteria pollutant emissions in those areas.

RCW 70A.65.020(4)(a)



# Whiteboard Activity and Discussion



# Whiteboard Activity



# Questions



December 2024 meeting discussion summary



Scope of pollutants



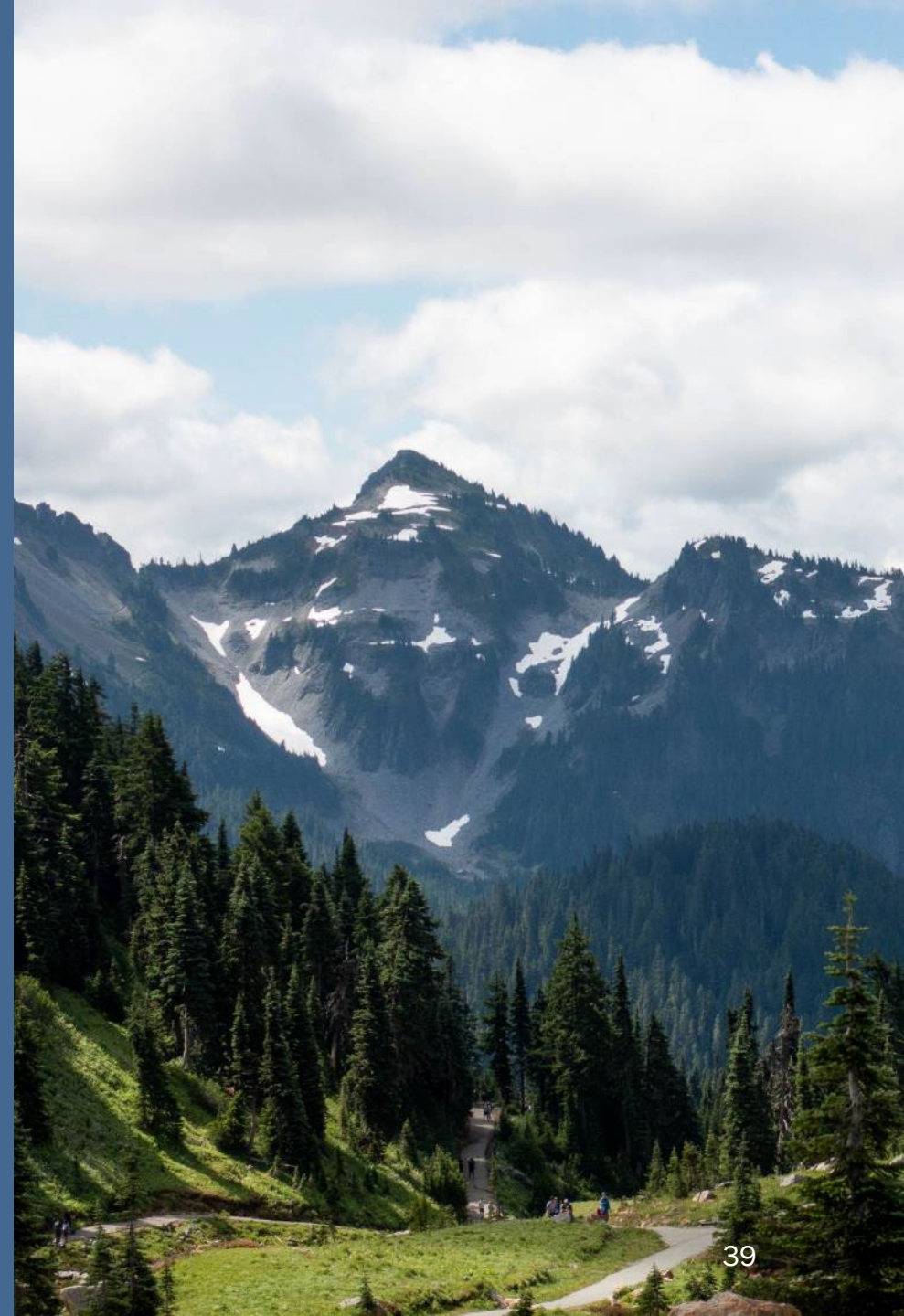
Air quality and emissions data sources



Scope of emission sources



# Looking Ahead



# Rulemaking Timeline




Future topics and dates are tentative.

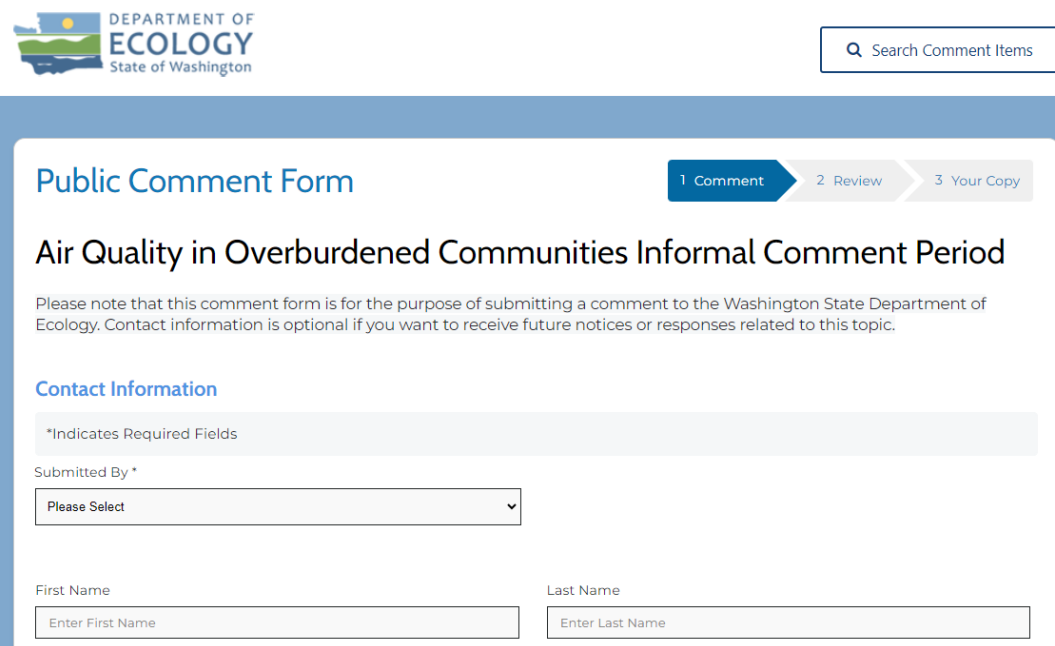


# Preview of Our Next Workshop

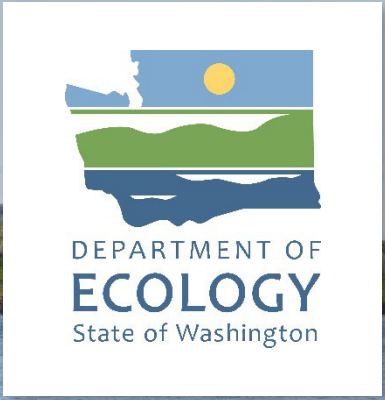
- Air quality targets
  - What form should a target take?
  - How can we measure and compare for target setting?
  - Which criteria air pollutants should a target be set for?

# More Information and Resources

- Rulemaking webpage  
<https://ecology.wa.gov/regulations-permits/laws-rules-rulemaking/rulemaking/wac-173-448>
- Public comment form   
<https://aq.ecology.commentinput.com/?id=peMcrVEmd>
- Overburdened Communities email distribution list  
[https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic\\_id=WAECY\\_217](https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_217)



The screenshot shows the 'Public Comment Form' interface for the 'Air Quality in Overburdened Communities Informal Comment Period'. The page includes the Department of Ecology logo and a search bar. A progress indicator shows three steps: '1 Comment' (active), '2 Review', and '3 Your Copy'. A note states: 'Please note that this comment form is for the purpose of submitting a comment to the Washington State Department of Ecology. Contact information is optional if you want to receive future notices or responses related to this topic.' The 'Contact Information' section includes a legend for required fields, a 'Submitted By' dropdown menu, and input fields for 'First Name' and 'Last Name'.



# Thank you!

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