Agenda – Updating WAC 173-400 WAC
SRU Alternative Emission Limitation Stakeholder meeting
Tuesday, October 16, 2018, 2 pm to 4 pm

Introductions

Review September 12, 2018 stakeholder meeting minutes

SO$_2$ stakeholder working group goals
Develop an alternative emission limitation standard that is:
- Legally and practicably enforceable (acceptable to EPA)
- Protective of the NAAQS – limits emissions by frequency, duration and concentration
- Acceptable to industry and the state

Ways to limit emissions

Work practice standards

Limits to:

- *Frequency* - The impact on ambient air is minimized because planned shutdown occurs infrequently.
- *Duration*
- *Total amount of SO2 emitted*

Criteria for setting alternative emission limitations from EPA SIP Call (40 CFR 33976 June 12, 2015)

1. Revision limited to narrowly defined source categories (SRU)
2. Only during technically infeasible control periods of shutdown
3. Frequency and duration of operation in shutdown is minimized
4. Worst-case emissions analyzed
5. During shutdown, impact of emissions on ambient air quality minimized to maximum extent practicable
6. The facility is operated in a manner consistent with good practice for minimizing emissions.
7. Documented properly

Decisions

- When would alternative emission limitation apply?
- What is the length and type of notification required for a shutdown to be "planned?"

Review proposed rule language

Rulemaking timeline

July 17, 2018	Announced rulemaking (filed CR-101)
September 12, 2018	Stakeholder meeting
October 16, 2018	Stakeholder meeting
November 15, 2018	Stakeholder meeting
January 22, 2019	Stakeholder meeting
February 27, 2019	Stakeholder meeting
March 20, 1919	Final Draft Rule Language due
May 22, 2019	Propose rule (file CR-102)
May – June 2019	Public comment period
June 25, 2019	Public hearing
Fall 2019	Adopt rule (file CR-103)

Handouts
Draft rule language

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