



DEPARTMENT OF
ECOLOGY
State of Washington

Concise Explanatory Statement

**Washington State Designation
Recommendations**

**2012 National Ambient Air Quality
Standard for Particulate Matter**

Response to Comments

December 2013
Publication no. 13-02-025

Publication and Contact Information

This publication is available on the Department of Ecology's website at <https://fortress.wa.gov/ecy/publications/SummaryPages/1302025.html>

For more information contact:

Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

Phone: 360-407-6800

Washington State Department of Ecology - www.ecy.wa.gov

- Headquarters, Olympia 360-407-6000
- Northwest Regional Office, Bellevue 425-649-7000
- Southwest Regional Office, Olympia 360-407-6300
- Central Regional Office, Yakima 509-575-2490
- Eastern Regional Office, Spokane 509-329-3400

For special accommodations or documents in alternate format, call 360-407-6800, 711 (relay service), or 877-833-6341 (TTY).

Concise Explanatory Statement

Washington State Designation Recommendations for the 2012 National Ambient Air Quality Standard for Particulate Matter

Air Quality Program
Washington State Department of Ecology
Olympia, Washington 98504-7600

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Introduction

The purpose of a Concise Explanatory Statement is to:

- Meet Environmental Protection Agency (EPA) requirements to respond to comments
- Provide reasons for making designation recommendations
- Describe any differences between the proposed and final recommendations
- Provide Ecology's response to public comments

This Concise Explanatory Statement provides information on The Washington State Department of Ecology's (Ecology's) designation recommendations for the 2012 National Ambient Air Quality Standard for Particulate Matter.

To see more information related to these air quality designations, please visit our web site: <http://www.ecy.wa.gov/programs/air/sips/designations/designations.htm>.

Reasons for Making Designation

When EPA revises air quality standards, the federal Clean Air Act provides each state with an opportunity to recommend designations of attainment (meets the standard), nonattainment (does not meet the standard), or unclassifiable (insufficient information) for all areas of the state. On December 14, 2012, EPA revised the annual standard for fine particle pollution. Washington has until December 13, 2013 to recommend designations for this standard.

Ecology reviewed Washington's fine particle monitoring data from 2010-2012. All areas of the state are either in attainment (meet air quality standards) or are unclassifiable (meaning there is insufficient information to determine whether they meet the standards).

Summary of Public Involvement Process

Ecology accepted comments from September 13, 2013 through October 30, 2013. We published notice of the public comment period and opportunity to request a hearing on our website on September 13, 2013, which meets the requirement of 31 days advance notice. We did not hold a hearing because we did not receive a request for one. However, we did receive written comments. This document contains our response to the comments we received.

Response to Comments

Description of comments:

The Concise Explanatory Statement responds to the identified comments in a question-and-answer format.

Commenter Index

The table below lists the names of organizations or individuals who submitted a comment on the rule proposal and where you can find Ecology’s response to the comment(s). In the third column, the comment number shows the order in which the responses appear.

Individuals and Organizations Providing Written Comments

Document Location in Appendix A	Name and Affiliation	Comment Number(s)
p. 6	Robert Hill	1, 2, 3, 4
p. 7	Leah Hauer, Northwest Hearth, Patio & Barbecue Association	5
p.8	Patricia Martin	6

Ecology accepted comments from September 13, 2013 until October 30, 2013. This section provides verbatim comments that we received during the public comment period and our responses.

Comment #1:

For those “coal trains” that will be coming to Longview and/or Bellingham, what are the choices of car cover to keep the dust down?

Ecology Response:

Thank you for submitting your comment letter. Your comments are outside the scope of the Washington State designation recommendations for the 2012 fine particle standard. No changes were made to the recommendations in response to this comment. However, a copy of your letter was shared with Ecology staff working on the Millennium Bulk Terminals-Longview coal export and the Gateway Pacific Terminal Project proposals. For more information on these proposals, the following links:

- Gateway Pacific Terminal - <http://www.eisgatewaypacificwa.gov/>
- Millennium Bulk Terminals-Longview - <http://www.millenniumbulkeiswa.gov/>

Comment #2:

Does the “1100 pound per megawatt” limit on greenhouse gas emission (now 970) apply equally to EACH gas, or cumulatively to all?

Ecology Response:

Thank you for your comment. The limit applies cumulatively to all greenhouse gases emitted by the combustion units at a power plant. Your question falls outside the scope of the proposal, so we did not make any changes as a result of your comment.

Comment #3:

How effective are the Carbon Capture scrubbers that EPA is proposing?

Ecology Response:

Thank you for your question. In general, carbon capture scrubbers are effective at removing carbon dioxide (CO₂). Some smaller scale systems have achieved removal rates of 90% during testing. However, the removal rate is limited by the concentration of CO₂ in the exhaust gas. If there is less CO₂, then there is less removal.

You can find additional information at the following resources:

- EPA’s website - <http://www.epa.gov/climatechange/ccs/>
- Department of Energy’s website - <http://energy.gov/carbon-capture-sequestration>
- Electric Power Research Institute website - Use search terms “CO₂ Scrubbing” and “Carbon Capture and Sequestration” at www.epric.om/Pages/Default.aspx.
- Environmental Defense Fund website - <http://www.edf.org/energy/carbon-storage>

Comment #4

What is the mailing address for the Puget Sound EPA office?

Ecology Response:

Thank you for your question. The mailing address for EPA is

U.S. EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Comment #5

The Northwest Heart, Patio & Barbecue Association supports the Department of Ecology (Ecology) recommending to the U.S. Environmental Protection Agency (EPA) that the EPA find Washington State meets the new annual federal air quality standard for fine particles, or PM_{2.5}

The Northwest Hearth, patio & Barbecue Association does not request the Department of Ecology (Ecology) to hold a public hearing on this issue.

Ecology Response:

Thank you for your support.

Comment #6

I do not support Ecology claiming PM_{2.5} compliance for all areas of Washington State. It would be inappropriate to conclude that Quincy and Yakima and other agricultural areas in Eastern Washington are in compliance without monitoring. Since we can now see our air on almost a daily basis (unless we have had wind or rain), I highly doubt that we can meet the new more stringent PM_{2.5} standard of 12 µg/m³.

Ecology Response:

Thank you for your comment. The Environmental Protection Agency (EPA) requires that data used to determine compliance with the national ambient air quality standards (NAAQS) come from monitors designated as Federal Reference Method (FRM) or Federal Equivalent Method (FEM)

Ecology recommended an attainment designation for Yakima County based on monitoring data from the FRM monitor located at 402 South 4th Ave in the city of Yakima. To determine if an area meets the annual standard, we followed EPA's process. We averaged all available FRM data for three years in a row. This average is called a design value. We compared the design value to the national ambient air quality standard for fine particles (or PM_{2.5}). EPA requested states make recommendations based on 2010-2012 monitoring data. The 2010-2012 design value for Yakima is 8.7µg/m³. This value meets the new annual standard for fine particles of 12.0 µg/m³.

EPA did not require states to make recommendations for the 24-hour standard because EPA did not change that standard. We still wanted to know the current design value. So, we calculated it using EPA's process. To determine if the 24 hour design values for 2010-2012 we averaged the yearly 98th percentile values for three years in a row. The 24-hour design value for the 2010-2012 monitoring data at 402 South 4th Ave in the city of Yakima is 31 µg/m³. This meets the 24 hour standard for fine particles of 35 µg/m³.

Ecology also recommended an attainment designation for Spokane County based on monitoring data from the FRM monitor located at Augusta Ave in the city of Spokane. This monitor had an annual 2010-2012 design value of 7.4 µg/m³ and a 24 hour design value of 24 µg/m³.

For the remaining counties in Eastern Washington, including Grant County, Ecology recommended an unclassifiable designation. Unclassifiable means that there is insufficient monitoring data to make an attainment/nonattainment designation for one of two reasons:

- there was not enough monitored data on which to make the designation
- the monitoring was conducted using non-FRM/FEM instruments

Ecology and its air quality partners have monitored fine particle pollution in many communities in eastern Washington, including Quincy, using non-FRM/FEM instruments. Although the data were not collected using FRM/FEM instruments, they do indicate that the ambient air quality in the monitored communities meets the NAAQS for fine particles.

EPA will make the final decision about what areas in Washington will be designated as attainment, nonattainment, or unclassifiable. EPA plans to designate geographic areas as attaining or not attaining the 2012 annual PM_{2.5} standards by December 12, 2014.

Appendix A: Copies of all written comments

SUNDAY,
October 5th,
A.D. 2013

To →

Perez, R

From →

Mr. Robert Hill

910 Tacoma AVE S

Tacoma 98402-2104

For these "coal trains" that will be coming to Longview and/or Bellingham, what are the chances of car-covers to keep the dust down?

Does the "1100 pound per megawatt" limit on greenhouse gas emissions (now 970) apply equally to EACH gas, or cumulatively to all?

How effective are the Carbon Capture scrubbers that EPA is proposing? What is the mailing address for Puget Sound EPA office?

Thank you.



September 24, 2013

Richelle Perez
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Dear Ms. Perez

The Northwest Hearth, Patio & Barbecue Association supports the Department of Ecology (Ecology) recommending to the U.S. Environmental Protection Agency (EPA) that the EPA find Washington State meets the new annual federal air quality standard for fine particles, or PM2.5.

The Northwest Hearth, Patio & Barbecue Association does not request the Department of Ecology (Ecology) to hold a public hearing on this issue.

The Northwest Hearth, Patio & Barbecue Association requests the Department of Ecology (Ecology) to notify the Northwest Hearth, Patio & Barbecue Association in advance if the Department of Ecology does hold a public hearing on this issue. Notification can be done via email at nwhpba@comcast.net and by U.S. Mail to:

NWHPBA
P.O. Box 13041
Spokane Valley, WA 99213-3041

Thank you,

A handwritten signature in cursive script, appearing to read "Leah".

Leah Hauer
NWHPBA Executive Director
PO Box 13041
Spokane Valley, WA 99213-3041
509-474-1403 ph 509-443-3875 fx
509-869-2060 cell
nwhpba@comcast.net

-----Original Message-----

From: Patty Martin [mailto:martin@nwi.net]
Sent: Thursday, November 14, 2013 1:28 PM
To: Perez, Richelle (ECY); 'Bray, Dave'
Subject: PM2.5 air quality

Dear Ms. Perez,

I just noticed that the deadline for comments on the PM2.5 compliance rule has passed and am requesting that you include my comments anyway.

I do not support Ecology claiming PM2.5 compliance for all areas of Washington State. It would be inappropriate to conclude that Quincy and Yakima and other agricultural areas in Eastern Washington are in compliance without monitoring. Since we can now see our air on almost a daily basis (unless we have had wind or rain), I highly doubt that we can meet the new more stringent PM2.5 standard of 12 ug/m3.

Thank you.

Patty

Patricia Martin
617 H St. SW
Quincy, WA 98848

Appendix B: Copies of public involvement notices

From: Perez, Richelle (ECY)
Sent: Thursday, September 12, 2013 6:06 PM
Subject: Washington meets federal air quality standard for fine particles

The Department of Ecology (Ecology) proposes to recommend to the Environmental Protection Agency (EPA) that it find Washington State meets the new annual federal air quality standard for fine particles, or PM_{2.5}. PM_{2.5} is small pieces of dust, soot, and smoke in the air. These particles are microscopic, a fraction of the diameter of a single human hair. Their tiny size allows them to be inhaled deep into our lungs and circulatory system, where they can cause serious health effects. EPA sets air quality standards for PM_{2.5} to protect public health.

Where do I find more information?

The attached notice has information about the purpose of the proposal and how to participate in the formal comment period. You can also contact me for more information.

Will there be a public hearing on Ecology's proposal?

There is an opportunity to request a public hearing on recommending these designations to EPA. You can request a hearing by contacting Richelle Perez at (360) 407-7528 by October 17, 2013. If Ecology receives a request for a public hearing, Ecology will hold a hearing to receive public comments on the proposed designation recommendations as follows:

October 23, 2013 at 1:30 pm
Department of Ecology HQ
300 Desmond Drive SE
Lacey, WA 98503

If no one requests a hearing, Ecology will not hold one. To find out if Ecology cancelled the hearing, check Ecology's Public Involvement Calendar or call Richelle Perez.

What is the anticipated timeline for Ecology's proposal?

- Beginning of public comment period September 13, 2013
- Deadline to request a public hearing October 17, 2013
- Public hearing, if held October 23, 2013
- End of formal comment period October 30, 2013
- Deadline to submit final recommendations to EPA December 14, 2013

Please let me know if you have questions.

Sincerely,

Richelle Perez
Washington State Department of Ecology
Air Quality Program
360-407-7528
richelle.perez@ecy.wa.gov

Washington meets federal air quality standard for fine particles

The Department of Ecology (Ecology) proposes to recommend to the Environmental Protection Agency (EPA) that it find Washington State meets the new annual federal air quality standard for fine particles, or PM_{2.5}. PM_{2.5} is small pieces of dust, soot, and smoke in the air. These particles are microscopic, a fraction of the diameter of a single human hair. Their tiny size allows them to be inhaled deep into our lungs and circulatory system, where they can cause serious health effects. EPA sets air quality standards for PM_{2.5} to protect public health.

What is the new PM_{2.5} standard?

On December 14, 2012, EPA revised the primary annual PM_{2.5} standard ([78 FR 3086 January 15, 2013](#)). In doing so, EPA strengthened the primary annual PM_{2.5} standard by lowering it from 15.0 micrograms per cubic meter (µg/m³) to 12.0 µg/m³.

Does Washington meet the standard?

Ecology reviewed Washington’s fine particle monitoring data from 2010-2012. All areas of the state are either in attainment (meet air quality standards) or are unclassifiable (meaning there is insufficient information to determine whether they meet the standards). Table 1 summarizes Ecology’s recommended designations for Washington.

Table 1: Designation Recommendations for Washington by County

County	Design Value	Designation Recommendation
Clark	7.0	Attainment
King	5.9	Attainment
Pierce	7.5	Attainment
Snohomish	7.3	Attainment
Spokane	7.4	Attainment
Yakima	8.7	Attainment
Rest of Washington (Adams, Asotin, Benton, Chelan, Clallam, Columbia, Cowlitz, Douglas, Ferry, Franklin, Grant, Grays Harbor, Island, Jefferson, Kitsap, Kittitas, Klickitat, Lewis, Lincoln, Mason, Okanogan, Pacific, Pend Oreille, San Juan, Skagit, Skamania, Stevens, Thurston, Walla Walla, Whatcom, Whitman)	Insufficient data	Unclassifiable

MORE INFORMATION

Formal Comment Period:

September 13, 2013 through October 30, 2013

Deadline to request a public hearing:

October 17, 2013

Public Hearing, if held:

October 23, 2013, 1:30 pm
Department of Ecology HQ
300 Desmond Drive SE
Lacey, WA 98503

- If Ecology does not receive a request for a hearing, as allowed by federal law, Ecology will not hold a hearing.
- If Ecology cancels the hearing, we will post this decision on Ecology’s Public Involvement calendar on October 18, 2013.
- You may also contact Ecology to find out if we canceled the hearing.

Contact information:

Richelle Perez
Air Quality Program
PO Box 17600
Olympia, WA 98504-7600
360-407-7528
richelle.perez@ecy.wa.gov

Special accommodations:

For special accommodations or documents in an alternate format, call 360-407-6800, 711 (relay service), or 877-833-6341 (TTY).

Will there be a public hearing on Ecology's proposal?

There is an opportunity to request a public hearing on recommending these designations to EPA. You can request a hearing by contacting Richelle Perez at (360) 407-7528 by October 17, 2013. If Ecology receives a request for a public hearing, Ecology will hold a hearing to receive public comments on the proposed designation recommendations as follows:

October 23, 2013 at 1:30 pm
Department of Ecology HQ
300 Desmond Drive SE
Lacey, WA 98503

If no one requests a hearing, Ecology will not hold one. To find out if Ecology cancelled the hearing, check Ecology's Public Involvement Calendar or call Richelle Perez.

How can I submit comments?

The comment period starts September 13 and ends October 30, 2013.

You can give us your official comments in the following ways:

1. Testify or submit written comments at the public hearing.
2. Email your comments to: AQComments@ecy.wa.gov
3. Mail comments to:
Department of Ecology
Richelle Perez
PO Box 47600
Olympia, WA 98504-7600

4. FAX: 360-407-7534

How will Ecology respond to comments?

All of the comments we receive will become part of the official record. We will publish responses to comments on Ecology's website when we submit our final recommendations to EPA. You will find your name listed in the document with a reference to where, in the document, Ecology responded to your comments.

What is Ecology's deadline for final recommendations?

Ecology must submit final recommendations to EPA before December 14, 2013.





Public Involvement Calendar

CALENDAR

Public Hearings, Meetings,
Workshops, Open Houses

Public Comment Periods

More Ecology Events

The Public Involvement Calendar is designed to engage the public in our **decision-making process**. We encourage you to read [Frequently Asked Questions about Effective Public Commenting](#).

Activities that are educational only or are co-sponsored by Ecology may be found under the "More Ecology Events" link in the left column of this page. We invite your **feedback** about this Public Involvement Calendar.

If you have special accommodation needs or require documents in alternative format, please contact Ecology at:

360-407-6000 (voice)

711 (relay service)

800-833-6388 (TTY)

Public Hearings, Meetings, Workshops, Open Houses
(Next 21 days. Use the search feature (right) for events beyond 21 days.)

Public Comment Periods

Sep 13 -
Oct 30

Public Comment Period:

Request a public hearing be held October 23, 2013, and/or comment on proposed WA State air quality designations.

WA State must meet federal air quality standards designated by the Environmental Protection Agency (EPA). Ecology is requesting EPA concur that Washington State meets the new annual federal air quality standard for fine particles or PM2.5. IF REQUESTS for a public hearing are received by Oct 17, 2013, the hearing will be Oct 23, 1:30 at 300 Desmond Drive SE, Lacey. Send hearing requests to Richelle Perez 360/407-7528. GENERAL COMMENTS on the proposed designation may be sent to Richelle 9/13-10/30/13. [Air Quality Designations](#)

Sponsor: Dept of Ecology

Contact: Richelle Perez

(360) 407-7528 / AQComments@ecy.wa.gov

Search Calendar

This search feature accesses only **decision-making events**.

Search

Select date range:

Today & Next 21 Days

Select city....

All Cities

....or county:

All Counties

Select event type:

All Types

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All Keywords

401

Air

Aquifer

Enter search text:

Search

Search Help

Millennium Bulk Terminals has proposed a coal export terminal at the former Reynolds Aluminum smelter near Longview. The scope of the environmental impact statement (EIS), or what the EIS should analyze, is open for public comment. The proposed terminal would receive coal by rail, stockpile and blend coal on-site, and load coal onto ships for export. The proposed facility would handle up to 44 million metric tons of coal per year. [Joint EIS Scoping](#)

Location: Longview, WA
Sponsor: Dept of Ecology
SOUTHWEST REGIONAL DIR
Contact: Diane Butorac
(360) 407-6594 / dbut461@ecy.wa.gov

Associated Public Meeting: Sep 17
Associated Public Meeting: Sep 25
Associated Public Meeting: Oct 1
Associated Public Meeting: Oct 9
Associated Public Meeting: Oct 17

Sep 3 -
Nov 4

Public Comment Period:
UPDATE: Seattle Shoreline Master Program Comprehensive Update Comment Period Extended
UPDATE: The Washington State Department of Ecology seeks public comment on the City of Seattle's proposed update to its Shoreline Master Program. The public comment period that opened on September 3 is extended an additional 30 days. [City of Seattle SMP Comprehensive Update](#)

Sponsor: Dept of Ecology
Contact: Joe Burcar
(425) 649-7145 / jobu461@ecy.wa.gov

Sep 13 -
Oct 30

Public Comment Period:
Ecology invites your comments on proposed WA State air quality designations.
WA State must meet federal air quality standards designated by the Environmental Protection Agency (EPA). Ecology is requesting EPA concur that Washington State meets the new annual federal air quality standard for fine particles or PM2.5. Ecology did not receive any requests for a public hearing by October 17, therefore, a hearing will not be held. GENERAL COMMENTS on the proposed designation may be sent to Richelle 9/13-10/30/13. [Air Quality Designations](#)

Sponsor: Dept of Ecology
Contact: Richelle Perez
(360) 407-7528 / AQComments@ecy.wa.gov

Sep 18 -
Oct 18

Public Comment Period: Colville
Public Notice of Application and SEPA Determination for Vaagen Brothers Lumber, Inc. SWDP ST0045537
Vaagen Brothers has submitted an application for a State Waste Discharge Permit to segregate up to 2,000 gpd of water softener backwash for use as a liquid deicer and dust control solution. It has been determined that it will not have a probable significant adverse impact on the environment. The public is invited to comment on the SEPA. Comments must be received by Ecology no later than September 25, 2013. The application can be viewed at the following link. [Water Quality Permitting and Reporting Information System \(PARIS\)](#)

Location: Colville, WA
Sponsor: Dept of Ecology
Contact: Shara-Li Joy
(509) 329-3455 / stra461@ecy.wa.gov

Sep 18 -
Oct 18

Public Comment Period: Seattle
Draft NPDES Permit Fishing Vessel Owners Marine Ways, Inc.
Fishing Vessel Owners Marine Ways, Inc. is being reissued NPDES



Air Quality

AIR QUALITY

- Motor Vehicles
- Agricultural Burning
- Outdoor Burning
- Indoor Burning
- Standards and Plans

Criteria Pollutants:

NAAQS

Air Quality Designations:

Maintenance Areas

Nonattainment Areas

Plans:

Attainment SIPs

Maintenance SIPs

Infrastructure,

[Air Quality](#) > [Air Quality Standards & Plans](#) > [Air Quality Designations](#)

Washington's Air Quality Designations

When EPA sets or revises an air quality standard, the federal Clean Air Act requires [EPA to designate](#) each area of Washington in one of three ways:

- Attainment (meeting a standard)
- Nonattainment (failing to meet a standard)
- Unclassifiable (not enough information to classify)

Each designation is for a specific air quality standard. An area can be in attainment for one standard and nonattainment or unclassifiable for another.

Design values:

Washington's air quality monitoring network collects data about certain air pollutants. Based on this monitoring data, the state calculates how much air pollution is in the air. This amount is called the "design value." It is compared to the amount that the air quality standard allows.

EPA specifies how to calculate the design value for each standard. For example, the design value (DV) for the 8-hour ozone standard is equal to the average of the yearly 4th highest daily maximum 8-hour value for the most

Designation Requests

[Ecology's recommendations to EPA on designating PM_{2.5} areas in Washington - Opportunity to request a hearing](#)