

Response to Comments:

Washington State Designation Recommendations

for 2015 National Ambient Air Quality Standard for Ozone

September 2016 Publication no. 16-02-022

Publication and Contact Information

This report is available on the Department of Ecology's website at https://fortress.wa.gov/ecy/publications/SummaryPages/1602022.html

For more information, contact:

Air Quality Program P.O. Box 47600 Olympia, WA 98504-7600 360-407-6800

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

•	Headquarters, Olympia	360-407-6000
•	Northwest Regional Office, Bellevue	425-649-7000
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Response to Comments:

Washington State Designation Recommendations

for 2015 National Ambient Air Quality Standard for Ozone

Air Quality Program Washington State Department of Ecology Olympia, Washington

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Introduction

The purpose of a Response to Comments is to:

- Meet EPA's 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 Response to Comments provides information about Ecology's designation recommendations for the 2015 National Ambient Air Quality Standard (NAAQS) for ozone.

For more information about these air quality designations, go to http://www.ecy.wa.gov/programs/air/sips/sips.htm.

Reasons for Recommending Designations

When EPA revises national air quality standards, the federal Clean Air Act provides each state an opportunity to recommend designations of:

- Attainment (meets and maintains the standard),
- Nonattainment (does not meet the standard), or
- Unclassifiable (not enough information to classify).

On October 1 2015, EPA revised the national air quality standard for ozone pollution. Washington has until October 1, 2016 to recommend designations for the standard.

Ecology reviewed Washington's ozone monitoring data from 2013 - 2015. All areas of the state are either in attainment (meet air quality standards) or are unclassifiable (there is not enough data to determine if they meet the standards).

Summary of Public Involvement Process

Ecology accepted comments from August 16, 2016 through September 16, 2016. We published notice of the public comment period and opportunity to request a hearing on our website on August 16, 2016. We did not hold a hearing because we did not receive a request for one. However, we did receive one written comment. This document contains our response to the comment we received.

Response to Comments

Ecology received one written comment about this proposal.

Table 1: Individuals Providing Written Comments

Name and Affiliation	
Caprice Consalvo-Olson, Kennewick	

Comment:

The installation of an ozone monitor in Kennewick is an important step toward improving air quality. Burning, in all forms (i.e. agricultural, backyard, fossil fuel, wildfire), needs to be evaluated in determining its contribution to high ground ozone levels. Collecting such data will facilitate classifying the Tri-Cities, Benton and Franklin counties and developing a needed plan for reducing elevated ozone levels.

Ecology Response:

Thank you for your comment. We agree that installing an ozone monitor in Kennewick provides us critical information that will help in improving air quality. Ecology and Benton Clean Air Agency installed a permanent ground-level ozone monitor in Kennewick in 2015, and the agencies will continue to monitor ground-level ozone levels in the area. If the area violates the ozone National Ambient Air Quality Standard (NAAQS), the agencies will follow EPA's process to evaluate all of the sources contributing to the high ozone levels. We will also develop and implement plans to reduce ozone pollution and comply with the NAAQS. We did not make any changes to the designation recommendations based on your comment.

Appendix A. Copies of all written comments

From: Caprice Consalvo-Olson [mailto:capriceco@charter.net]

Sent: Wednesday, September 07, 2016 7:18 PM

To: ECY RE AQComments < AQComments @ECY.WA.GOV>

Subject: Ozone Monitor-Kennewick

The installation of an ozone monitor in Kennewick is an important step toward improving air quality. Burning, in all forms (i.e. agricultural, backyard, fossil fuel, wildfire), needs to be evaluated in determining its contribution to high ground ozone levels. Collecting such data will facilitate classifying the Tri-Cities, Benton and Franklin counties and developing a needed plan for reducing elevated ozone levels.

Thank you.

Caprice Consalvo-Olson

Kennewick

Appendix B. Copies of public involvement notices

Ekrem, Joanna (ECY)

From:

Ekrem, Joanna (ECY)

Sent:

Tuesday, August 16, 2016 1:27 PM

To:

Ekrem, Joanna (ECY)

Subject:

Comment on Proposed Ozone Air Quality Designation

Greetings,

Ecology is accepting comments on a <u>proposed recommendation</u> to the U.S. Environmental Protection Agency on air quality designations for the 2015 ozone national ambient air quality standards. Ecology proposes that all areas in Washington are in attainment with the standard or are unclassifiable due to insufficient monitoring data.

Review Proposed Recommendation:

You may review and comment on the proposed designation recommendation from August 16, 2016 through September 16, 2016. The document is available for review at

http://www.ecy.wa.gov/programs/air/sips/pdfs/Public Notice WA O3 Des Rec.pdf.

Public Hearing (if requested):

- The public can request a public hearing by contacting Joanna Ekrem by email at <u>Joanna.ekrem@ecy.wa.gov</u> or by phone at 360-407-6826.
- Requests must be received no later than August 30, 2016.
- If requested, a hearing will be held at 6 pm on September 15, 2016 at Washington State Department of Ecology, 300 Desmond Dr., Lacey, WA 98503.
- If a hearing request is not received, Ecology will announce a cancellation of the September 15 public hearing on its public involvement calendar: https://fortress.wa.gov/ecy/publiccalendar/.

How to comment:

- Email <u>AQComments@ecy.wa.gov</u>
- Mail Washington Dept. of Ecology, Joanna Ekrem, PO Box 47600, Olympia, WA 98504-7600
- Testify or submit written comments at the public hearing

For more information, please contact me by phone at (360) 407-6826 or by e-mail at joanna.ekrem@ecy.wa.gov.

Thanks, Joanna

Joanna Ekrem

Planner
Air Quality Program
WA Dept. of Ecology
tele 360-407-6826
joanna.ekrem@ecy.wa.gov

Ekrem, Joanna (ECY)

From:

Sent:

Ecology's Air Quality Rule and State Implementation Plan Updates <ECY-AQ-RULE-AND-

SIP-UPDATES@LISTSERV.WA.GOV> on behalf of ECY RE AQComments

<a href="mailto: AQComments@ECY.WA.GOV Tuesday, August 16, 2016 3:45 PM

To:

ECY-AQ-RULE-AND-SIP-UPDATES@LISTSERV.WA.GOV

Subject:

Washington SIP Notice: Comment on Proposed Ozone Air Quality Designation

Proposed Ozone Designations: Ecology is accepting comments through September 16 on a proposed recommendation to the U.S. Environmental Protection Agency on air quality designations for the 2015 ozone national ambient air quality standards. Ecology proposes that all areas in Washington are in attainment with the standard or are unclassifiable due to insufficient monitoring data.

More information: Public notice, Ozone webpage



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Public Comment Period on the Proposed Washington Designation Recommendations for the 2015 Ozone NAAQS

The Washington Department of Ecology (Ecology) opens a 32 day public comment period on the proposed 2015 Ozone NAAQS designation recommendations starting on page 2 of this document.

Public Comment Period August 16 – September 16, 2016

Request a Public Hearing

The public can request a public hearing by contacting Joanna Ekrem by email at <u>Joanna.ekrem@ecy.wa.gov</u> or by phone at 360-407-6826.

Requests must be received no later than August 30, 2016. If a hearing request is received by the deadline, it will be held at 6 pm on September 15, 2016 at the Department of Ecology, 300 Desmond Drive SE, Lacey, WA 98503. You can find a map and directions on Ecology's website http://www.ecy.wa.gov/contact.html.

If a hearing request is not received, Ecology will announce a cancellation of the September 15 hearing on its public involvement calendar: https://fortress.wa.gov/ecy/publiccalendar/.

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

Documents for Review

The proposal we are accepting public comment on is available starting on page 2 of this document.

A hard copy of the proposal is also available for review at Ecology Headquarters, 300 Desmond Drive, Lacey, WA 98503. Please call (360) 407-6826 to schedule an appointment to view the document.

How to Comment

You can give us your comments in the following ways:

- 1. Email your comments to: AQComments@ecy.wa.gov
- 2. Mail comments to:

Department of Ecology Joanna Ekrem PO Box 47600 Olympia, WA 98504-7600

Request a public hearing by August 30, 2016, and testify or submit written comments at the hearing.

All comments received will be part of the official public record. Ecology will prepare a response to the comments received.

Proposed Washington Designation Recommendations for the 2015 Ozone NAAQS

The U.S. Environmental Protection Agency sets national ambient air quality standards (NAAQS) to protect public health and the environment. When EPA revises the NAAQS, the federal Clean Air Act provides each state with an opportunity to recommend designations for all areas of the state as:

- Attainment (meets the standard),
- · Nonattainment (does not meet the standard), or
- Unclassifiable (insufficient information).

2015 Ozone NAAQS

On October 1, 2015, EPA strengthened the ozone NAAQS from 75 to 70 parts per billion (ppb) (80 FR 65292, October 26, 2015). An area will meet the standard if the ozone design value is equal to or less than 70 ppb. The ozone design value is the fourth-highest maximum daily 8-hour ozone concentration per year, averaged over three years.

As the Governor's designee for the State Implementation Plan (SIP), Ecology is responsible for submitting a recommendation to EPA by October 1, 2016 on air quality designations.

Ozone Design Values and Designation Recommendation for Washington Ecology reviewed Washington's ozone monitoring data, and all monitors in the state are meeting the standard based on 2013-2015 design values. Ecology installed an ozone monitor in Kennewick in 2015, and there is not enough information for a 3 year design value.

Table 1: Ozone Design Values by Monitor

Monitoring Site	2013-2015 Design Value (ppb)
Enumclaw - Mud Mtn.	66
Cheney - Turnbull	62
Spokane - Greenbluff	61
Spokane – Augusta Ave	61
Mt.Rainier - Jackson Visitors Ctr	60
North Bend North Bend Way	59
Vancouver – Blairmont Dr	58
Yelm - Northern Pacific	54
Issaquah – Lake Sammamish	53
Cheeka Peak	52
Custer - Loomis	45
Seattle - Beacon Hill	45
Anacortes - 202 Avenue	42
Kennewick - S Clodfelter	Insufficient information

Ecology recommends the designations listed in Table 2:

Table 2: Designation Recommendations for Washington

Benton, Franklin, and Walla Walla Counties	Unclassifiable (insufficient information)
Rest of state	Attainment/unclassifiable

Since there is insufficient monitoring data for the Kennewick monitor, Ecology recommends that Benton, Franklin, and Walla Walla counties be designated unclassifiable. Unclassifiable areas are treated the same as attainment areas. The rest of the state is either in attainment with the standard or lacks monitoring data, so Ecology recommends the rest of the state be designated attainment/unclassifiable.

Next Steps

EPA will consider Ecology's recommendation, and will review the most recent monitoring data from 2016. EPA will notify Ecology if it agrees with or modifies the state's recommendation in June 2017. Ecology can respond to EPA by early August 2017 and submit new information or justification.

EPA will issue final designations by October 1, 2017. EPA's final decision will take into consideration ozone monitoring data from 2014-2016. Since the Kennewick monitor will only have two years of monitoring data at that time, it is likely EPA will designate the area as unclassifiable.

Future Technical Work

In the fall of 2016, Ecology will work with local clean air agencies to review the most recent monitoring data and determine whether any area in the state violates the standard based on 2014-2016 design values. Ecology will evaluate whether exceptional events, such as wildfires, contributed to the violation. If exceptional events such as wildfires push an area into potential nonattainment, Ecology may request to EPA to remove monitoring data from exceptional events from consideration.

If an area is likely nonattainment based on 2014-2016 design values, the next step is to develop a boundary recommendation for a nonattainment area and submit the recommendation to EPA. Ecology will follow EPA's guidance and conduct a five factor analysis to determine the boundary, in consultation with local clean air agencies and other stakeholders.

Ecology will also conduct a study in the summer of 2016 to evaluate elevated levels of ozone in the Tri-Cities area, with results expected in mid-2017. The results will tell us what is causing high levels of ozone in the area, and will help us determine additional community outreach needs and reduction strategies.

More information

For more information on designations, see:

EPA's ozone designations webpage - https://www.epa.gov/ozone-designations

Contact us

If you have any questions, or would like to receive additional information and updates on this project, please contact Joanna Ekrem at (360) 407-6826 or <u>Joanna.ekrem@ecy.wa.gov</u>.



Public Involvement Calendar

Public Involvement Calendar

The Public Involvement Calendar is designed to engage the public in our decision-making process. We encourage you to read <u>Frequently Asked Questions about Effective Public</u> 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 <u>feedback</u> about this Public Involvement Calendar.

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

Sep 15 2016 6:00PM Public Hearing - Lacey

Washington Ozone Designation Recommendation

Ecology recommends EPA designate Washington as meeting national air quality standards for ozone for areas with sufficient air monitoring data and unclassifiable for areas with not enough data (Central Puget Sound and the Tri-Cities). A public hearing will only be held if requested by August 30, 2016. Cancellation of the public hearing will be posted on the public involvement calendar.

More Information: More Information

Location: Dept of Ecology HQ/Southwest Regional Office

300 Desmond Drive SE

Lacey, WA 📆

Sponsor: Ecology

ECY SWRO

Contact: Joanna Ekrem

(360) 407-6826 / jekr461@ecy.wa.gov

Public Comment Period - Aug 16 2016 - Sep 16 2016

Aug 16 2016 Public Comment Period - Statewide

Sep 16 2016 Washington Ozone Designation Recommendation

Ecology recommends EPA designate Washington as meeting national air quality standards for ozone for areas with sufficient air monitoring data and unclassifiable for areas with not enough data (Central Puget Sound and the Tri-Cities). A public hearing will only be held if requested by August 30, 2016. Cancellation of the public hearing will be posted on the public involvement calendar.

More Information: More Information
Location:

Statewide, WA

Sponsor: Ecology

ECY SWRO

Contact: Joanna Ekrem

(360) 407-6826 / jekr461@ecy.wa.gov

Public Hearing - Sep 15 2016 6:00PM

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Public Involvement Calendar

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Sep 15 2016 6:00PM Public Hearing - Lacey

Washington Ozone Designation Recommendation

PUBLIC HEARING CANCELLED: Ecology recommends EPA designate Washington as meeting national air quality standards for ozone for areas with sufficient air monitoring data and unclassifiable for areas with not enough data (Central Puget Sound and the Tri-Cities). A public hearing will only be held if requested by August 30, 2016. Cancellation of the public hearing will be posted on the public involvement calendar.

More Information: More Information Location: Dept of Ecology HQ/Southwest Regional Office

300 Desmond Drive SE Lacey , WA ₹⊒ Sponsor: Ecology

ECY SWRO Contact: Joanna Ekrem

(360) 407-6826 / jekr461@ecy.wa.gov

Public Comment Period - Aug 16 2016 - Sep 16 2016

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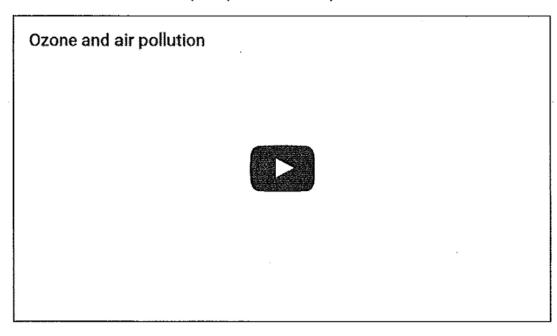
Ecology home > News > News Release

Department of Ecology News Release - August 17, 2016

Draft recommendation would list state as meeting new U.S. ozone standard

Ecology seeks comment on proposed request to EPA

OLYMPIA - The Washington Department of Ecology plans to submit a draft recommendation to the U.S. Environmental Protection Agency stating that Washington meets the new, tougher federal air quality standards for ozone. Ecology first wants the public to weigh in on the proposal.



The EPA adopted

a <u>tighter ozone standard</u> last year, based on current health studies. States face an Oct. 1 deadline to recommend whether EPA should designate any counties or regions as not meeting the new standard.

Although Ecology plans to tell federal authorities the state overall meets the new tougher standards, there isn't enough data collected on Benton, Franklin and Walla Walla counties and they will be earmarked as "unclassified" as a result.

"Being marked as unclassified means that we haven't collected enough data to make a recommendation," said Ecology Atmospheric Scientist Ranii Dhammapala. "We've monitored ozone in the Tri-Cities for only one year and the EPA standard requires three years of monitoring data."

Dhammapala and other Ecology scientists have discovered that ozone can reach high levels in the southern Columbia Basin. The agency is conducting a <u>special study</u> in the area to help pinpoint the origin of high Tri-Cities ozone levels.

Ground-level ozone can <u>harm delicate tissues</u> In peoples' respiratory systems. The elderly, very young children and people with existing respiratory or heart conditions are particularly at risk. Ozone also can <u>weaken plants</u>, affecting both natural areas and commercial forest and crop yields.

In the upper atmosphere, ozone is a beneficial gas. There, it filters harmful radiation in sunlight.

Ecology's proposed status for Washington under EPA's new ozone standard is available for review on the department's <u>website</u>. The public can comment on the draft filing through Sept. 16, 2016.

To submit public comments, please email Ecology at <u>AQComments@ecy.wa.gov</u>, or write to: Joanna Ekrem
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Contact:

Larry Altose, Ecology communications, 425-649-7009, @EcySeattle

Joanna Ekrem, air quality program, 360-407-6826

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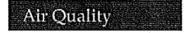
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Air Quality > Paths to Cleaner Air > Air Quality Standards

Air Quality Standards

Federal and state agencies set air quality standards for outdoor air. The purpose of these standards is to prevent air pollution from reaching levels that hurt human health. When an area does not meet an air quality standard, the state must develop a plan to clean up the air.

National Standards

EPA sets national standards for six air pollutants called "<u>criteria air pollutants</u>." These federal standards are called national ambient air quality standards (NAAQS). States monitor air quality in different areas to find out if the areas are meeting the national air quality standards. The criteria air pollutants are:

- Ozone (O₃)
- Carbon Monoxide (CO)
- Nitrogen Dioxide (NO₂)
- Particulate Matter (PM10, and PM2.5)
- Sulfur Dioxide (SO₂)
- Lead (Pb)

Ozone Designation
Public Comment:
Ecology's proposed
recommendation is available for
review and comment August 16,
2016 - September 16, 2016.

Send comments to
AOComments@ecy.wa.gov or to:
Joanna Ekrem
Air Quality Program
WA State Dept. of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

There are both national and state standards for most criteria air pollutants. States may set standards at different levels than the federal levels for their areas, State standards must be at least as protective as federal standards.

Designations

When EPA sets or revises a national standard, Washington uses air monitoring data to determine if air quality meets the new or revised standard. Based on this data, Washington recommends to EPA how areas of the state should be classified or *designated*. EPA sets each area's designation. Possible designations are:

- Attainment (meeting and maintaining a standard)
- Nonattainment (not meeting a standard)
- · Unclassifiable (not enough information to classify)

Огопе

In 2015, EPA adopted a more protective ozone standard from 0.075 parts per million (ppm) to 0.070 ppm. Washington must submit to EPA its recommendation whether EPA should declare any counties or areas that do not meet (are not in attainment or "non-attainment") the new standard. Based on air monitoring data, most of Washington meets the standard. However, Ecology recommends that Benton, Franklin, and Walla Walla Counties are unclassified because we have only monitored ozone in the Tri-Cities for one year, instead of three years as required.

Public Comment: Ecology's proposed recommendation to EPA is available for review and comment August 16, 2016 - September 16, 2016.

Send your comments to AOComment's@ecy.wa.gov or to:

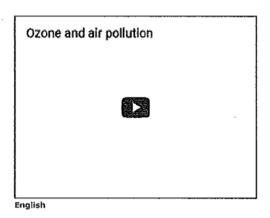
Joanna Ekrem Air Quality Program Washington State Department of Ecology P.O. Box 47600 Olympia, WA 98504-7600

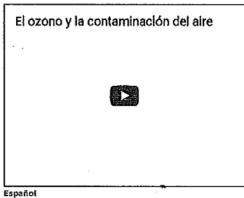
State Implementation Plans (SIPs)

The federal Clean Air Act requires states to develop plans to protect and maintain air quality in the state. It also requires states to develop specific plans to bring areas not meeting standards (nonattainment) back into attainment. These plans are called <u>State Implementation Plans</u> (SIPs).

Con	tact	Us
22011	100.0	-

Ozone video





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Ozone Designation

Public Comment:

Ecology's proposed

Send comments to

Air Quality Program

WA State Dept. of Ecology

Olympia, WA 98504-7600

3oanna Ekrem

P.O. Box 47600

recommendation is available for review and comment August 16,

AQComments@ecy.wa.gov or to:

2016 - September 16, 2016.

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Cleanup & Spills



Air Quality > Paths to Cleaner Air > Air Quality Standards > Criteria Pollutants > Ozone

Ozone (O₃)

Ozone high in the Earth's atmosphere protects us from the sun's harmful radiation. But ozone at ground level is air pollution, and is harmful to people and plants. Ozone is formed when air pollution — nitrogen oxides and volatile organic compounds (VOCs) — from vehicles, industry, and other sources react with each another in sunlight and hot temperatures. It is an ingredient of smog.

Health Effects

Ground-level ozone irritates the eyes, nose, throat, and respiratory system. It's especially bad for those with chronic heart and lung disease (like asthma, bronchitis, and emphysema), children and elderly, as well as pregnant women.

What You Can Do To Reduce and Avoid Ozone Pollution

When pollution rises on hot days:

- · Cut down on strenuous physical activity outside.
- · Stay inside until it cools down outside.
- Don't drive unless you have to. Share a ride, take the bus, ride your bike, or walk when you can. If you must drive, combine your trips.
- · Refuel your car or truck after dusk. Don't top off your tank.
- · Limit engine idling.
- · Put off using gasoline-powered lawn and garden equipment until the hot spell is over.
- . Don't fire up the barbecue or fire pit.
- Conserve electricity. Set your air conditioner at a higher temperature.
- Save that painting project for later. Don't use paint or other products that release solvent gases.

National Ozone Standard

In 2015, EPA adopted a more protective ozone standard from 0.075 parts per million (ppm) to 0.070 ppm. Washington must submit to EPA its recommendation whether EPA should declare any counties or areas that do not meet (are not in attainment or "non-attainment") the new standard. Based on air monitoring data, most of Washington meets the standard. However, Ecology recommends that Benton, Franklin, and Walla Walla Counties are listed as unclassified because we have only monitored ozone in the Tri-Cities for one year, instead of three years as required.

Public Comment

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Send your comments to AOComments@ecv.wa.gov or to:

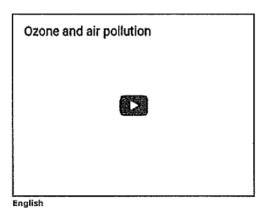
Joanna Ekrem Air Quality Program Washington State Department of Ecology P.O. Box 47600 Olympia, WA 98504-7600

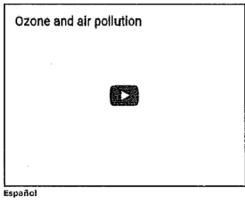
Pollutant	Level	Remarks
Ozone	0.070 ppm (parts per million)	Annual 4th-highest daily maximum 8-hour concentration, averaged over 3 years

Contact Us

Ozone video

http://www.ecy.wa.gov/programs/air/sips/pollutants/NAAQs O3.htm





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Affidavit of Publication

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The notice in the exact form annexed, was published in regular issues of The Daily Journal of Commerce, which was regularly distributed to its subscribers during the below stated period. The annexed notice, a

PN:COMMENT-AIR QUAL OZONE

was published on

08/16/16

The amount of the fee charged for the foregoing publication is the sum of \$118.80 which amount has been paid in full.

98/16/2016

Subscribed and sworn to before me on

Notary public for the State of Washington, residing in Seattle

State of Washington, King County

State of Washington Notice of Opportunity to Comment and Request a Hearing

Ecology is accepting comments on a proposed recommendation to EPA on air quality designations for the 2015 ozone national ambient air quality standards. Ecology proposes that all areas in Washington are in attainment of the standard or are unclassifiable due to insufficient monitoring data.

You may review and comment on the proposed designation recommendation from August 16, 2016 through September 16, 2016. The document is available for review at http://www.ecy.wa.gov/ programs/air/sips/designations/ designations.htm

To comment: To request a hear-

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Email to: AQComments@ecv. wa.gov Email: Joanna.ekrem@ecv.wa.gov

Mail to: Call: 360-407-6826

Joanna Ekrem

Washington State Dept. of Ecology

P.O. Box 47600

Olympia, WA 98504-7600

If requested, a hearing will be held at 6 pm on September 15, 2016 at Washington State Department of Ecology, 300 Desmond Dr., Lacey, WA 98503. Requests must be received no later than August 30, 2016. If a hearing is not requested, Ecology will announce a cancellation on its public involvement calendar: https://fortress.wa.gov/ecv/publiccalendar/.

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

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