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State of Washington

Air Operating Permit Program Report

Fiscal Year 2019
(July 1, 2018 – June 30, 2019)

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Air Operating Permit Program Report

*Fiscal Year 2019
(July 1, 2018 – June 30, 2019)*

by Trischa Lohr Barlet

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Washington State Department of Ecology
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Introduction

The Air Quality Program's mission is to protect and enhance the air quality of Washington to safeguard public health, the environment, and future generations.

Our strategic plan ensures our employees and other stakeholders are working toward a common goal. Work performed to meet the goals of the strategic plan is supported by funds from the Air Quality Program and the air operating permit program.

This report summarizes the air operating permit program performance, program activities, and financial details for Fiscal Year 2019 (July 1, 2018 – June 30, 2019).

Air Operating Permit Program Summary

The air operating permit program is an air pollution control program, based in federal law, designed to standardize air quality permits and the permitting process for major sources of air emissions.

Section 502(b) of the 1990 federal Clean Air Act amendments requires all sources subject to the permitting requirements under the air operating permit of the Clean Air Act amendments to pay an annual fee. These fees must cover all reasonable direct and indirect costs required to develop and administer the permit program.

EPA establishes an annually-adjusted minimum fee (“presumptive minimum fee”) expected to pay for the air operating permit program costs. Washington is required to provide detailed

accounting if its fee schedule is less than the presumptive minimum, or if the EPA thinks the fee schedule is insufficient to cover program costs.

To ensure financial accountability, Ecology’s air operating permit program undergoes a fiscal audit every other year. Permit program services are summarized in this report and are consistent with the state Clean Air Act (CAA), the Revised Code of Washington (RCW), and the Washington Administrative Code (WAC). These provide regulatory authority for the air operating permit program.

For more information about this report, contact Trischa Lohr Barlet at trischa.lohrbarlet@ecy.wa.gov or 360-407-7530.

Air Operating Permit Program Financial Performance

Total program revenue and expenditure

For Fiscal Year 2019 (July 1, 2018 – June 30, 2019), Ecology’s Air Operating Permit Program budget and projected revenue was \$2,058,761. The budget is set using a workload analysis that identifies the costs associated with Ecology staff performing various air operating permit tasks (WAC 173-401-900(3)). The air operating permit opening and closing balance is a working capital reserve required to maintain a positive fund balance throughout the fiscal year (July 1 – June 30). Opening fund balances greater than nine months’ worth of estimated expenditures are eligible for rebates as described in the "rebates and credits" section of this report.

| Biennium 2017 – 2019 | | | |
|--|-------------|---|-------------|
| Fiscal Year 2018 | | Fiscal Year 2019 | |
| Account opening balance | \$793,736 | Account opening balance ¹ | \$1,081,555 |
| Actual revenue (fees + development and oversight) | \$1,790,480 | Actual revenue ² (fees + development and oversight) | \$2,058,764 |
| Actual expenditures | \$1,502,661 | Actual expenditures | \$1,770,896 |

¹A registration fee was deposited into the air operating account in error in Fiscal Year 2018. It was corrected in Fiscal Year 2019, but the difference was calculated into Fiscal Year 2018’s revenue and account closing balance for the Fiscal Year 2018 annual report. In the state agency financial reporting system (AFRS), Fiscal Year 2018 revenue was \$1,790,930 and the Fiscal Year 2018 ending fund balance/Fiscal Year 2019 opening fund balance was \$1,082,005. Because the purpose of this report is to reflect actual fee payments by air operating permit sources during the Fiscal Year 2019 period, the opening balance for Fiscal Year 2019 reflects the adjustment of the registration fee error.

² The state financial reporting system reports \$2,058,251 in revenue at the end of Fiscal Year 2019. This included the registration fee correction from Fiscal Year 2018 and a registration permit processing fee that was deducted in error. Actual air operating permit revenue, accounting for these adjustments, was \$2,058,764. The table above represents actual air operating permit revenue payments made in Fiscal Year 2019.

| | | | |
|-------------------------|-------------|--------------------------------------|-------------|
| Account closing balance | \$1,081,556 | Account closing balance ³ | \$1,369,422 |
|-------------------------|-------------|--------------------------------------|-------------|

Table 1: Fiscal Year 2018 and Fiscal Year 2019 Comparison

Fee revenue

Ecology billed and collected \$1,962,322 from 31 facilities with air operating permits. WAC 173-401-900(5)(b) directs the allocation of air operating permit fees to each source. The amount billed included:

- An emission fee of \$37.71 per ton of emissions emitted
- A complexity fee which ranged from \$20.15 to \$106,050.14
- A flat fee of \$21,100.23
- A 3 percent processing fee if a credit card is used for fee payment

Development and oversight (D&O) revenue

Development and oversight costs are Ecology's costs to:

- Develop and administer the state air operating permit program
- Oversee the program administration by the delegated local clean air agencies

All sources with an air operating permit pay Ecology's development and oversight costs (WAC 173-401-900(5)(a)). The costs for Ecology sources are included in the flat fee portion of their billing. Local clean air agencies paid \$96,442 in development and oversight costs for Fiscal Year 2019 (July 1, 2018 – June 30, 2019).

Expenditures

WAC 173-401-940 lists the activities authorized to be performed using funds supported by the state air operating permit program. During Fiscal Year 2019, Ecology spent \$1,770,896 administering these activities. Activities include:

- Permit processing
- Permit management
- Program management
- Delegation and regulation
- Technical assistance
- Public outreach and education
- Monitoring and oversight

| Expenditures | |
|-----------------------|-------------|
| Salaries | \$1,071,947 |
| Benefits ⁴ | \$378,840 |

| | |
|--|--------------------|
| Intra-agency reimbursements ⁵ | \$169,431 |
| Goods and services ⁶ | \$117,950 |
| Travel | \$28,370 |
| Capital outlays ⁷ | \$2,626 |
| Professional service contracts | \$1,653 |
| Grants, benefits, and client services ⁸ | \$79 |
| Total | \$1,770,896 |

Table 2: Fiscal Year 2019 Expenditures

Air operating permit program presumptive minimum test

EPA establishes an annually-adjusted minimum fee called “presumptive minimum” that is expected to cover air operating permit program costs. The presumptive minimum rate for Fiscal Year 2019 (July 1, 2018 – June 30, 2019) is \$51.06 per ton of emissions. Ecology sources emitted 17,348 tons of regulated pollutants, so Ecology’s program presumptive minimum is \$885,789.

In 2019, Ecology collected \$2,058,764 in revenue. Ecology revenue is greater than the presumptive minimum for 2019, so it is presumed sufficient to cover air operating permit program costs.

Rebates and credits

In the past, the Office of Financial Management (OFM) allowed Ecology to accrue a negative cash balance until fees were received. Since 2015, OFM has required Ecology to maintain a positive monthly cash balance in each dedicated account it manages. This is a challenge in the Air Operating Permit Account because expenditures are ongoing, yet total revenue is received in annual payments nine months into each fiscal year. Fiscal years begin July 1 and end June 30; revenue is generally received at the beginning of March. In order to maintain a positive cash balance in the Air Operating Permit Account, Ecology is building a working capital reserve.

Until the opening fund balance of a fiscal year is greater than nine months’ worth of estimated expenditures (determined by the workload analysis), rebates will be suspended. The opening fund balance for Fiscal Year 2019 was \$1.08 million. Nine months’ worth of estimated

³ The air operating permit account ending balance in AFRS for Fiscal Year 2019 is \$1,369,360. Because this report reflects adjustments to the revenue as described above, it reflects the air operating permit balance based on actual air operating permit revenue and expenditures in Fiscal Year 2019.

⁴ Survivors insurance, disability insurance, retirement, etc.

⁵ Reallocation of expenditures and accruals within an agency

⁶ Materials, supplies, communications, postage, utilities, subscriptions, etc.

⁷ Furnishings, equipment, and software purchases with a useful life greater than one year

⁸ Charge to permittees for using electronic payment service (E-Pay)

expenditures for Fiscal Year 2019 would have been \$1.54 million, so no rebates or credits will be given for the 2019 billing. When rebates are applied, they are calculated at the end of each fiscal year and applied to the following fiscal year's fee.

Previously, the working capital reserve required to maintain a positive cash balance assumed seven months' worth of estimated expenditures. Source fees are due by February 28 each year. Local clean air agencies' development and oversight fees are due by March 31 each year (WAC 173-401-930(1), 935(2)).

Program Performance

Ecology performed the following to support the air operating permit program:

- Permit processing – application reviews, pre-application assistance, permit renewals, draft permits, public notices, permit register, public hearings, modifications and amendments, operational reviews, performance audits, and permit appeals
- Permit management – inspections, stack test oversight, report reviews, emissions reports, annual compliance, enforcement, complaint investigations, monitoring and local oversight, and NESHAP reports
- Program management and support – program administration and planning, data management, fee administration, emissions inventory support, accounting, supervision, permit workshops, training, coordination, audits, and public records requests
- Delegation and regulation – rulemaking, permit guidance, engineering support, engineering development, and interagency agreements
- Technical assistance – source assistance, source environmental audits, program evaluation and compliance, business liaison, policy coordination

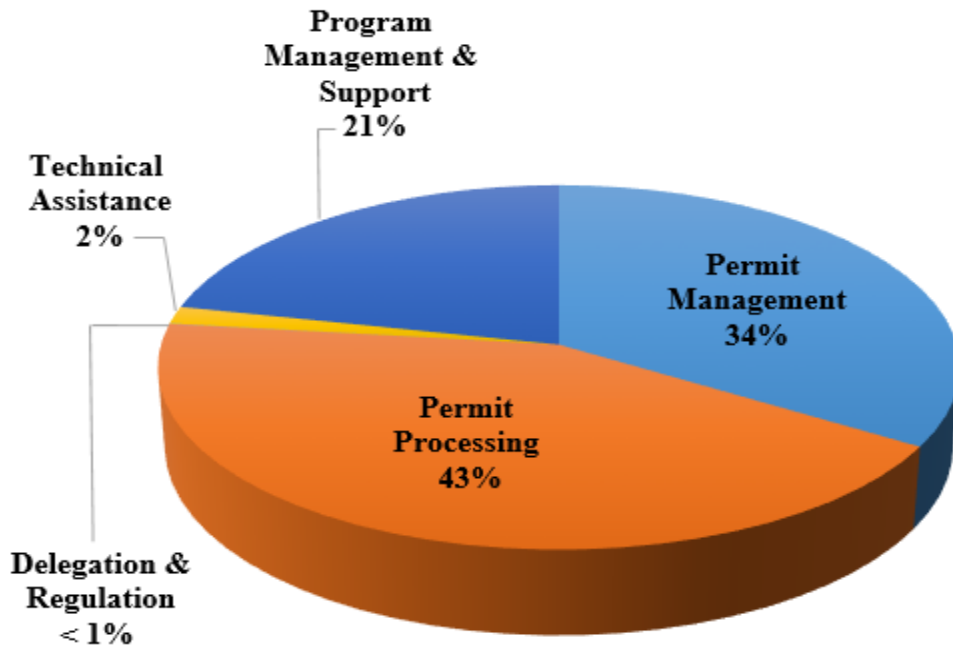


Figure 1: Program Support Activities

Workload Analysis

Ecology is required to conduct a workload analysis each biennium that allows for public comment before it is published on Ecology’s website. The analysis includes resource requirements for both the direct and indirect costs of the air operating permit program, and is a projected budget for the work to be performed in the next biennium.

In June 2016, the workload analysis was updated for Fiscal Years 2018 and 2019 (2017-2019 biennium). Updates to the analysis are completed each fiscal year to account for changes in salaries, benefits, indirect costs, and the air operating permit fee schedule.

To receive notice about air operating fees and fee determination, contact Trischa Lohr Barlet at trischa.lohrbarlet@ecy.wa.gov or 360-407-7530.

Management and Support

Staffing levels

Ecology staff are calculated as Full Time Equivalents (FTEs). This is a useful measurement because it helps budget analysts estimate labor costs. One FTE is a unit that indicates the

workload of one full-time employee working 40 hours per week. In some instances, the actual FTE exceeds the projected FTE by the workload analysis due to shifting of staff resources when workload increases or during staffing vacancies.

| Section | Office | Projected Direct FTEs | Actual Direct FTEs |
|---------------------------------|--------------------|------------------------------|---------------------------|
| Program Management, HQ | Ecology, Lacey | 0.42 | 0.56 |
| Science/Engineering, HQ | Ecology, Lacey | 1.32 | 1.00 |
| Policy and Planning, HQ | Ecology, Lacey | 0.09 | 0.00 |
| Technical Services, HQ | Ecology, Lacey | 0.41 | 0.36 |
| Industrial Section, HQ | Ecology, Lacey | 4.34 | 4.27 |
| Central Regional Office | Ecology, Union Gap | 1.61 | 0.96 |
| Eastern Regional Office | Ecology, Spokane | 3.73 | 2.47 |
| Nuclear Waste Program (Hanford) | Ecology, Richland | 1.58 | 1.42 |
| Dept. of Health (Hanford, WSU) | Richland | 0.48 | 0.77 |
| Total | | 13.98 | 11.81 |

Table 3: Projected vs. Actual Staffing Levels

Emissions Inventory

An emissions inventory is a list of pollutants discharged into the air during a specific time period. Ecology collects emissions data according to federal regulations. The inventory is used to determine significant sources of air pollution, provide the public with air emissions data, and establish trends.

Ecology Air Quality Program’s emissions inventory group tracks emissions inventories from major stationary sources of air pollution. In 2019, sources with an air operating permit in Ecology’s jurisdiction emitted 17,348 tons of emissions, including particulate matter (PM₁₀), volatile organic compounds (VOC), nitrogen oxides (NO_x), and sulfur dioxide (SO₂).

Air pollution sources submit their emissions data using the Washington Emissions Inventory Reporting System (WEIRS). WEIRS is an electronic data collection system that allows sources with an air operating permit and local clean air agencies to report their emissions data.

The information in WEIRS is submitted to EPA so they can develop the National Emissions Inventory (NEI). The National Emissions Inventory is released every three years based on data submitted by state, local, and tribal clean air agencies. The inventory consists of criteria pollutants, criteria precursors, and hazardous air pollutants from air emissions sources. The data allows EPA to identify trends and establish air quality standards.

Delegation and Regulation

Ecology has authority delegated through federal and state law to implement and enforce various environmental laws and rules. This is accomplished through a public rulemaking process, and by ensuring compliance with those laws and rules.

Rulemaking

Federal proposal

On June 25, 2019, EPA proposed a change to 40 CFR Part 63 that would implement the clear language of the Clean Air Act that allows major sources of hazardous air pollutants (HAP) to reclassify as area sources at any time, provided they permanently reduce hazardous air emissions.⁹ This action would provide a level of fairness and flexibility for sources that reduce hazardous air pollutant emissions below major source thresholds. Sources could reclassify as area sources, reducing regulatory burden.

Fiscal Year 2019 rule changes

On August 16, 2018, Ecology adopted amendments to Chapter 173-400 WAC and Chapter 173-401 WAC to comply with EPA's 2015 State Implementation Plan (SIP) call. In 2016, EPA proposed a rule amendment to 40 CFR Parts 70 and 72 to remove the affirmative defense provisions from the federal Title V permitting regulations. This proposal was an extension of EPA's 2015 startup, shutdown, and malfunction SIP action, known as a SIP call.¹⁰ EPA has not finalized this rulemaking because they are reviewing their decision for possible change or repeal as part of a lawsuit against the 2015 decision.

Effective September 16, 2018

Ecology amended public notice requirements in WAC 173-401-800 and Chapter 173-400 WAC to require web posting of public comment periods, draft permits, and changes to existing permits.¹¹ This revision allows public notices to be posted on an agency website instead of exclusively requiring newspaper notice. It will save permitted sources the cost of a newspaper ad and will likely reach a wider audience.

⁹ <https://www.epa.gov/stationary-sources-air-pollution/documentation-reclassification-major-sources-area-sources-under>

¹⁰ State Implementation Plans: Response to Petition for Rulemaking; Restatement and Update of EPA's SSM Policy Applicable to SIPs; Findings of Substantial Inadequacy; and SIP Calls To Amend Provisions Applying to Excess Emissions During Periods of Startup, Shutdown and Malfunction, 80 FR 33839 (June 12, 2015). Federal Register: The Daily Journal of the United States. Web. September 2016. <https://www.gpo.gov/fdsys/granule/FR-2015-06-12/2015-12905>

¹¹ <https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Closed-rulemaking/WAC-173-400-July15>

Permit Processing

Renewals

An air operating permit expires 5 years after it is issued. Ecology completes the renewal process in an average of 18 months. If a source has submitted a completed application to Ecology, the source may continue operating under their current (expired) permit (Chapter 173-401-705(2)).¹² Sources can submit an application for air operating permit modifications, revisions, and renewals. Two sources submitted a permit modification and one submitted a permit revision during Fiscal Year 2019.

| Active Ecology air operating permits | Sources operating under an extended permit (under renewal) | Initial applications submitted | Total initial applications in process | Initial applications older than 18 months |
|--------------------------------------|--|--------------------------------|---------------------------------------|---|
| 28 | 13 (46 percent) | 0 | 3 | 3 (100 percent) |

Table 4: Permit Application Renewals

Permit Management

Compliance and enforcement activities

Ecology's goal is to ensure compliance by offering technical assistance and education. Formal and informal enforcement actions include (in increasing severity):

- Notice of correction (NOC)
- Notice of violation (NOV)
- Administrative order
- Notice of penalty (NOP)

Penalties are issued for serious violations or when non-compliance continues after Ecology has provided technical assistance or warnings. During the Fiscal Year 2019 reporting period, Ecology undertook the following air quality-related compliance and enforcement actions.

Ecology issued 2 notices of correction and 8 notices of violation. Most of the violations were due to illegal burning. Other violations were issued due to facilities exceeding their permitted emission limits for hazardous air pollutants and violating motor vehicle emission requirements.

¹² Air operating permit application shield: <http://app.leg.wa.gov/WAC/default.aspx?cite=173-401-705>

Before being issued a notice of violation, a facility is given a verbal warning and offered technical assistance. Also issued were 2 administrative orders and 3 notices of penalty due to sources of emissions being out of compliance or from illegal burning.

Ecology completed 34 partial compliance evaluations (PCE). A partial compliance evaluation is an on-site evaluation conducted to make a compliance determination focused on regulated pollutants, processes, regulatory requirements, or emission units. Examples of specific activities include, but are not limited, to:

- Visible emission observations
- Consent decree follow-up
- Reports and semi-annual deviation reports
- Facility records review

Ecology completed 18 full compliance evaluations (FCE). A full compliance evaluation is a comprehensive on-site evaluation to assess compliance of a facility. It addresses:

- All regulated pollutants at all regulated emission units
- The current compliance of each emission unit
- The facility's continuing to maintain compliance at each emission unit

Ecology notifies a source of a high priority violation (HPV) or federally-reportable violation (FRV) if one is found during an inspection. In turn, facilities can report a violation to Ecology for quality assurance. A high priority violation can require EPA oversight if the violation is not addressed and resolved within 180 days. During Fiscal Year 2019, 5 HPVs were found (1 notified, 1 addressed, 3 resolved) and 11 FRVs were found (8 notified, 2 discovered, 1 resolved). Violations can result from:

- Emission violation
- Enforcement violation
- Air operating permit application violation
- Testing, monitoring, and reporting violation

Penalties

In Fiscal Year 2019, Ecology issued 1 penalty for a violation of air operating permit regulations. Ecology issued and received \$27,500 in related penalty revenue. There are currently no operating permit penalties under appeal or outstanding. Money received from penalties does not become part of the air operating permit budget. Instead, the money is directed by law to be deposited into the Air Pollution Control Account to fund:

- Environmental restoration and enhancement projects
- Research and development
- Permitting and regulatory programs
- Education and assistance

When deciding the appropriate amount of the penalty, Ecology considers the following:

- The nature of the violation
- Prior behavior of the facility
- Actions taken by the violator to correct the problem

Ecology works with businesses to help them comply with state laws. Penalties are issued in cases where non-compliance continues after Ecology has provided technical assistance or warnings, or for particularly serious violations.

Technical Assistance

Ecology provides technical assistance, training, and advice about air operating permits to local clean air agencies, industry, and other affected groups. For the purposes of this report, technical assistance includes coordination among air operating permit writers.

Permit Writers Training

The Electronic Reporting Tool (ERT) is used to electronically create and submit stationary source sampling test plans to regulatory agencies, and to calculate and submit the test results as an electronic report to the regulatory agency. EPA provided a training webinar on the ERT and related environmental reporting and recordkeeping systems to Ecology staff in October 2018.

Another federal electronic tool used by permit writers and air operating permit personnel is “Integrated Compliance Information System” (ICIS Air). EPA offers an online training course containing six integrated modules that Ecology staff can use to learn about minimum data requirements when entering data into ICIS. Staff can attend Environmental Compliance History Online (ECHO) Data Verification training webinars to assure proper verification of data entered into ICIS Air.

Air Quality staff have the opportunity to attend an EPA Title V workshop every other year. These workshops include information about EPA policy and oversight, permit writing, processing, monitoring, revisions, renewals, and compliance/enforcement.

Ecology periodically hosts a variety of environmental training courses provided by third party providers or other regulatory agencies. These courses are designed to improve the permit writer’s and inspector’s general skills and knowledge. In Fiscal Year 2019, third party providers included:

- WESTAR
- Nelson Facilitation
- EPA
- APTI-Learn (through EPA)

Permit writers meetings

Permit writers have a large amount of authority and responsibility. They must stay informed about regulatory changes, so that they issue effective permits that meet state air quality standards. The permitting process should be consistent and all permits should be federally-enforceable.

Over time, these meetings have expanded to include environmental planners, rule writers, scientists, and engineers. Quarterly meetings include attendees from Ecology, local clean air agencies, Energy Facility Site Evaluation Council (EFSEC), EPA Region 10, Washington State Department of Health, Oregon Department of Environmental Quality, Alaska Department of Conservation, and Idaho Department of Environmental Quality.

The purpose of the meetings is to exchange information and knowledge, network about technical issues, develop implementation plans for new federal requirements, and interpret new policies.

Meeting dates and locations:

- September 27, 2018 – Ecology’s Northwest Regional Office, Bellevue
- December 20, 2018 – Ecology Headquarters, Lacey (conference call)
- March 21, 2019 – Ecology Headquarters, Lacey (conference call)
- June 12, 2019 – Ecology’s Northwest Regional Office, Bellevue

Outreach and Education

Public involvement

A public participation event includes a public comment period, public meeting, public hearing, or webinar where the public is invited to provide comments about air quality developments. Ecology provides the public an opportunity to comment or attend a public meeting/hearing when a permit is being renewed or revised, and during stages of rulemaking.

Ecology invited the public to comment on the following air operating permits:

- Naval Air Station Whidbey Island: June 27, 2018 – August 6, 2018
- Northwest Pipeline, Washougal Compressor Station: June 29, 2018 – July 29, 2018
- Hanford Nuclear Reservation: June 29, 2018 – July 29, 2018
- Hanford Nuclear Reservation: July 22, 2018 – September 14, 2018
- Kenworth Truck Company: September 18, 2018 – October 25, 2018
- Cardinal FG, Winlock: September 27, 2018 – November 1, 2018
- Avista, Kettle Falls Generating Station: October 10, 2018 – November 9, 2018
- Clark PUD, River Road: December 5, 2018 – January 4, 2019
- Shell Puget Sound Refinery: December 5, 2018 – January 4, 2019
- North Pacific Paper Company: February 12, 2019 – March 15, 2019

- Goldendale Generating Station: March 25, 2019 – April 24, 2019
- LAB Washington: April 10, 2019 – May 10, 2019
- Vaagen Brothers Lumber Company: April 25, 2019 – May 27, 2019
- Sun Steel: May 13, 2019 – June 13, 2019
- Nippon Dynawave: June 10, 2019 – July 11, 2019

Ecology invited the public to comment on the following air operating permits program activities:

- Proposed Complexity Level for Air Operating Permit Fees: November 8, 2018 – December 10, 2018

Ambient Monitoring and Oversight

Audits and reviews

The air operating permit program must have a performance overview audit every three years and a fiscal audit every 2 years.

Every three years, Ecology and local clean air agencies conduct a performance overview audit. In 2016, Chapter 173-401 WAC was revised, updating performance audit requirements. The revised rule introduced requirements for a performance audit advisory committee, framework for an overview audit, and options for an intensive performance audit. The most recent performance overview audit was completed in December 2017 and a report was written. The next audit will be completed in Fiscal Year 2020.

The purpose of a fiscal audit is to verify that the air operating permit account funds are being used as authorized by the law. The most recent audit occurred in Fiscal Year 2018 for Fiscal Years 2016 and 2017. The results of the audit found that account funds were being used as authorized. The next fiscal audit will be completed in Fiscal Year 2020 for Fiscal Years 2018 and 2019. The report will be published on the Washington State Auditor’s Office website.

Other Activities

Pacific Northwest International Section (PNWIS) annual conference

The Pacific Northwest International Section (PNWIS), which is a branch of the Air and Waste Management Association, held their annual conference November 7 – 9, 2018 at the Vancouver Island Conference Centre in Nanaimo, British Columbia. The 2018 PNWIS conference provided a technical program discussing environmental issues relating to air and waste management in the Pacific Northwest. Topics included permitting, air modeling, emissions monitoring, regulatory updates, climate change, and greenhouse gases.

State Review Framework reporting

State Review Framework reports allow EPA to identify recommendations for improvement to ensure fair and consistent enforcement and compliance programs across states. Each Ecology office received desk manual training on State Review Framework findings and Integrated Compliance Information Systems (ICIS) database. Training dates were:

- July 25, 2018 – Industrial Section/HQ, Lacey
- July 31, 2018 – Central Regional Office, Union Gap
- July 31, 2018 – Nuclear Waste Program and Washington State Department of Health, Richland
- August 16, 2018 – Eastern Regional Office, Spokane