



Washington State Implementation Plan Revision

Revised Olympic Region Clean Air Agency General Regulations

By Linda Kildahl

For the Air Quality Program

Washington State Department of Ecology
Olympia, Washington

July 2024

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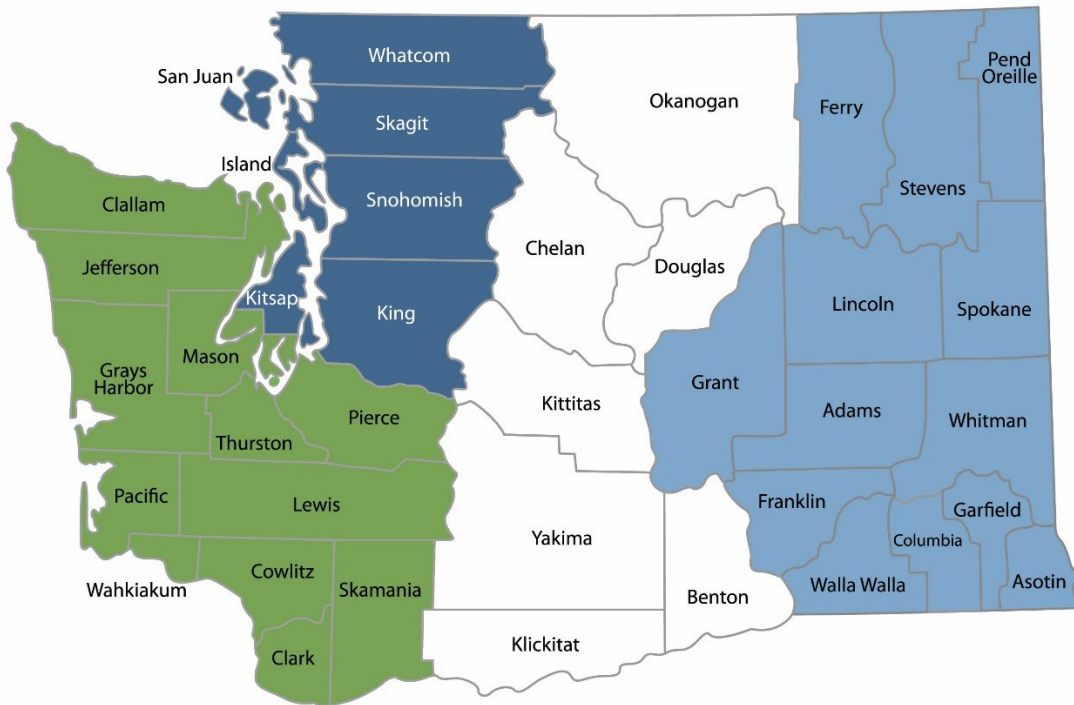
To request an ADA accommodation, contact Linda Kildahl by phone at 360-706-3038 or email at linda.kildahl@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit Ecology's website for more information.

¹ <https://ecology.wa.gov/about-us/contact-us>

² <https://www.orcaa.org>

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
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Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	P.O. Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	P.O. Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 West Alder Street Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 North Monroe Spokane, WA 99205	509-329-3400
Headquarters	Statewide	P.O. Box 46700 Olympia, WA 98504	360-407-6000

Washington State Implementation Plan Revision

Revised Olympic Region Clean Air Agency General Regulations

Air Quality Program
Washington State Department of Ecology
Olympia, WA

July 2024 | Publication 24-02-021



DEPARTMENT OF
ECOLOGY
State of Washington

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Executive Summary

The Washington State Department of Ecology (Ecology) requests that the U.S. Environmental Protection Agency (EPA) approve this revision to the Washington State Implementation Plan (SIP) proposed by the Olympic Region Clean Air Agency (ORCAA). The proposed SIP revision updates ORCAA air quality regulations currently in the Washington SIP.

On January 11, 2023, the ORCAA Board of Directors adopted an amendment to its general air quality regulations to remove the prohibition on recreational fires that had been in effect in the cities of Olympia, Lacey, and Tumwater since March 2011. EPA approved this provision, ORCAA Rule 6.2.7(c), into the Washington SIP on October 3, 2013. With this submittal, Ecology is requesting that EPA approve the amended Rule 6.2.7 Recreational Burning, which removes subsection (c), as shown in Appendix B.5, into the Washington SIP. This proposed SIP revision is applicable in ORCAA's jurisdiction of Thurston County, Washington. No other areas in ORCAA's jurisdiction are affected.

Ecology held a public comment period from February 8 through March 17, 2024, on whether the proposed SIP revision should be submitted to EPA. Ecology held an online public hearing on March 12, 2024. No members of the public attended the public hearing. Ecology received one written comment during the public comment period. Ecology's response to the comment is included in Appendix F.

Introduction – ORCAA SIP Revision

Background

The federal Clean Air Act (CAA) authorizes EPA to adopt National Ambient Air Quality Standards (NAAQS) to protect public health and welfare, and to prevent adverse effects from air pollutants. The CAA requires states to develop and adopt SIPs to show how they attain and maintain the latest NAAQS and relevant federal rules. To include state and local clean air agency regulations and programs in the Washington SIP, Ecology submits SIP revisions to EPA for approval after a notice, comment period, and, if requested, a public hearing. When EPA approves inclusion of state and local agency regulations into the SIP, they become federally enforceable.

The Washington SIP currently includes ORCAA’s Rule 6.2.7(c), which prohibits recreational fires within the cities of Olympia, Lacey, and Tumwater in Thurston County, Washington. This section was originally submitted to EPA for inclusion in the SIP as part of the 2013 second 10-year Limited Maintenance Plan update for the Thurston County Particulate Matter (PM10) area. ORCAA has since determined that the prohibition on recreational fires is not necessary to attain or maintain PM10 standards in these areas, nor is it germane to the control measures in the attainment plan and original maintenance plan.

On January 11, 2023, ORCAA’s Board of Director’s adopted an amendment to remove subsection (c) from Rule 6.2.7, which had been in effect since March 2011. The amended rule became effective on March 6, 2023.

Scope and Purpose of the SIP Revision

Ecology requests EPA to approve ORCAA’s amended Rule 6.2.7, Recreational Burning, which removes subsection (c), into the Washington SIP. The amended language is shown in strikethrough text in Appendix B.5. Other amended rule language shown in Appendix B.5 relates to Rule 6.2.8, which is not part of the SIP and is not proposed for incorporation into the Washington SIP.

This SIP revision applies only to Thurston County, Washington and does not apply to other areas in ORCAA’s jurisdiction or to areas within Tribal jurisdictions.

SIP Revision Submittal Documents

This SIP revision request is to remove ORCAA Rule 6.2.7(c) from the Washington SIP. All other portions of the SIP remain unchanged.

- Appendix A: ORCAA’s request letter to Ecology
- Appendix B: ORCAA’s rulemaking documents and public notices
- Appendix C: Additional ORCAA public outreach
- Appendix D: ORCAA’s coordination with EPA prior to rule adoption

- Appendix E: Public notice and opportunity for input on the draft SIP Revision (Ecology)
- Appendix F: Public comments received and response to comments (Ecology)
- Appendix G: SIP adoption order (Ecology)

ORCAA Outreach and Coordination

ORCAA conducted outreach during the rulemaking to inform the public about the rule change and its anticipated impacts. Documentation of this outreach is included in Appendix C of this document.

Prior to submitting the SIP request to Ecology, ORCAA coordinated with EPA on the proposed amendment to remove Rule 6.2.7(c) from the Washington SIP. ORCAA provided a demonstration to show that the amendment would not interfere with any applicable requirement concerning attainment, reasonable further progress, or any other applicable requirement of the federal Clean Air Act. A copy of ORCAA's demonstration and the EPA's response letter is included in Appendix D of this document.

Ecology's Request

Ecology requests EPA to approve the amended Rule 6.2.7, adopted by ORCAA's Board of Directors on January 11, 2023, into the Washington SIP.

Public Involvement

Ecology held a public comment period from February 8 to March 17, 2024, on whether the proposed SIP revision should be submitted to EPA. Ecology held an online public hearing on March 12, 2024. No members of the public attended the public hearing. Ecology received one written comment during the comment period.

To satisfy state and federal requirements for public review, Ecology took the following actions:

- Published a legal notice in "The Olympian."
- Sent an email describing the proposed SIP revision and opportunity for comment to subscribers of Ecology's "Air Quality Rules and SIPs" distribution list.
- Posted public notice information on Ecology's "Infrastructure, rule, and program plans" webpage.
- Added to Ecology's "Events Listing" public calendar with additional details about the public comment period and hearing date.

Appendix E contains documentation of Ecology's public involvement process.

Appendix F contains comments received during the public comment period and Ecology's responses.

Differences between public review draft and final SIP revision

- The executive summary, this subsection, and Appendix E through F were updated with details about the public involvement process and copies of outreach documents and webpages.
- Minor, non-substantive changes, such as page numbering and formatting adjustments, were made in preparing for final submission to EPA. No substantive changes were made between the public review draft and this final document.

Appendix A

ORCAA request letter to Ecology



2940 Limited Lane NW
Olympia, WA 98502

*Representing Clallam, Grays Harbor, Jefferson,
Mason, Pacific, and Thurston Counties*

1-800-422-5623 • (360) 539-7610

Laura Watson
300 Desmond Drive SE
Lacey, WA 98503

Dear Ms. Watson,

The Olympic Region Clean Air Agency (ORCAA) requests that the Washington State Department of Ecology (ECY) submit the attached adopted revision to ORCAA Regulation, Rule 6.2.7 to the United States Environmental Protection Agency (EPA) for inclusion with the Washington State Implementation Plan (SIP).

ORCAA worked through established public processes to remove the ORCAA Rule 6.2.7(c) from our Regulation. The change was published in the Washington State Register and the removal was official on March 6, 2023.

The revision to the rule was made after ORCAA determined that Rule 6.2.7(c) is not needed to maintain healthy air quality in the area covered by this rule. As part of the 2013 second 10-year Limited Maintenance Plan update for the Thurston County Particulate Matter (PM10) area, Ecology in coordination with ORCAA submitted ORCAA Rule 6.2.7(c) regarding recreational fires as part of the package included in the SIP. The inclusion of this rule, however, was an error. ORCAA has reviewed the 1999 maintenance plan, and recreational fires were not a component of the control measures relied on to demonstrate maintenance (65 FR 59128, October 4, 2000). Nor was the rule part of the original 10-year Implementation Plan – it only appeared in the second 10-year Limited Maintenance Plan.

In addition to clarifying the rules, the proposed changes improve compliance efforts as well as coordination with other agencies, especially local fire departments, by ensuring all communities are treated equally and fairly in our air quality regulations. Despite the removal of this specific rule, ORCAA retains the ability to regulate smoke from all fires under other existing rules.

Please do not hesitate to contact me for further conversation or clarification.

Sincerely,

A handwritten signature in black ink that reads "Jeff C Johnston".

Jeff Johnston, Ph.D.
Executive Director
Olympic Region Clean Air Agency

Appendix B

ORCAA rulemaking documents

- B.1. Notice of proposed rule amendment and public hearing
- B.2. Summary of issues raised in public comments and ORCAA responses to comments
- B.3. Concise explanatory statement
- B.4. Notice of rule adoption
- B.5. Adopted rule language amendment shown in strikethrough text

Appendix B.1

Notice of proposed rule amendment and public hearing

**PUBLIC NOTICE
NOTICE OF PUBLIC HEARING
PROPOSED CLEAN AIR REGULATION CHANGES
OLYMPIC REGION CLEAN AIR AGENCY (ORCAA)**

Olympic Region Clean Air Agency (ORCAA) has scheduled a public hearing to consider changes to ORCAA's Regulations, Rules 6.2.7 and 6.2.8, regarding the removal of the ban on recreational burning in the city limits of Lacey, Olympia, and Tumwater.

On January 11, 2023, a formal hearing on the proposed regulation change will be held at Olympic Region Clean Air Agency (ORCAA), 2940 Limited Lane NW, in Olympia during their regular scheduled Board meeting beginning at 10:00 am.

Written comments on the change may be submitted to the agency until January 9, 2023 or attend the public hearing on January 11, 2023, via the Zoom link on ORCAA's website, or in person at the address above. Information regarding the regulation change is available for review online at www.orcaa.org. Notice is given by the Executive Director, Jeff C. Johnston Ph.D., of the Agency.

Phone: (360) 539-7610 or 1-800-422-5623

Appendix B.2

Summary of issues raised and ORCAA response to comments

Proposed Revisions to ORCAA Rule 6.2.7c

Summary of issues raised in public comments and ORCAA's response

During the public comment period for the Proposed Revisions to ORCAA Rule 6.2.7c concerning the ban on recreational fires within Lacey, Olympia, and Tumwater, ORCAA received 21 written comments. Those comments raised several issues. ORCAA staff has investigated the concerns and provides the following responses to the issues raised.

Several comments addressed fire danger. Commenters generally were concerned that allowing recreational fires would increase fire danger.

The Olympia and Tumwater Fire Departments, and the Lacey Fire District 3, have been involved with this proposed rule amendment. ORCAA is not a fire agency though we work closely with them to provide messaging to our residents in our counties on responsible burning.

The change would allow small recreational fires in Lacey, Olympia, and Tumwater – just as they are allowed in every other Western Washington city. There are NO changes to any city or county fire codes or building/zoning ordinances. Cities and counties continue to have authority to regulate for fire safety purposes.

Several comments addressed wildfire smoke. Commenters generally were concerned that recreational fires would contribute to unhealthy conditions caused by wildfire smoke.

Western Washington experienced multiple days of regional wildfire smoke the last few years. ORCAA is also concerned about exposure to wildfire smoke, but these events are outside ORCAA's control and are beyond the scope of this rulemaking amendment. ORCAA provides air quality monitoring information, and we work with state and local health departments during these events. In the event of adverse conditions created by wildfire smoke or other factors, ORCAA maintains authority to call Stage 1 burn bans which would shut down all outdoor burning to protect public health and safety, as allowed by Rule 6.2.6.

Air quality is bad locally. Commenters expressed concern that allowing recreational fires will cause localized impacts and unhealthy conditions.

The US Environmental Protection Agency (EPA) requirements for ambient monitoring recognize the monitor located in the City of Lacey as being indicative of air quality in Thurston County. That monitor has shown compliance with all national ambient air quality standards (including the particulate matter standards of PM₁₀ and PM_{2.5}) for more than two decades. ORCAA's nuisance smoke regulations will continue to be enforced to protect local air quality. Additionally, the growing use of personal air monitoring devices, such as the Purple Air sensor,

allows ORCAA staff to 'crowd-source' local air quality monitoring to isolate potential problem areas. If problem areas are identified, ORCAA's compliance and education teams can focus on those areas for targeted responses.

Under Rule 6.2.7, recreational fires must be small (maximum of 3 feet diameter and 2 feet high) and must use dry, seasoned firewood or charcoal. Burning yard waste such as leaves, clippings, prunings, and other yard and gardening debris continues to be prohibited in cities and their urban growth area (UGA) boundaries under Rule 6.2.3. Furthermore, under ORCAA Rule 6.2.5(g), burning recreational fires is unlawful if it is detrimental to the health, safety, or welfare of any person; if it causes damage to property or business; or if it causes a nuisance. In short, there is no change to ORCAA's nuisance smoke rule 6.2.5(g), which is the rule that has been enforced and allows ORCAA to focus on problem fires, no matter the kind or location.

Potential health impacts. Commenters expressed concerns that allowing recreational fires will have adverse health impacts on neighbors.

There are concerns from those with asthma and other medical issues. This remains a concern for ORCAA as well but is best handled on an individual basis with the those involved. For those that are impacted by smoke, ORCAA has an existing nuisance regulation – Rule 6.2.5(g) – to address those situations.

For those concerned about health impacts of wood combustion, this is usually a summertime activity, the duration is relatively short, and the smoke dispersion is typically good.

Department of Ecology estimates emissions of multiple pollutants from multiple activities at the county level as part of the Air Emissions Inventory. To put the quantity of smoke from a recreational fire in perspective, based on the Department of Ecology's 2017 Air Emissions Inventory, it's estimated the amount of PM₁₀ produced by outdoor burning in Thurston County (which includes land clearing, yard debris burning and campfires) is 105 tons per year. For comparison, woodstove use is 381 tons per year of PM₁₀. If all the air emissions source categories are added together, including the top contributors such as road dust, dust from construction activities, and PM₁₀ from wildfires, the total PM₁₀ emissions in Thurston County are 3,194 tons per year. Thus, outdoor burning is less than 4 percent of the county-wide emissions.

The proposed rule is as stringent as the state regulation and regulates recreational burning in Lacey, Olympia, and Tumwater the same as recreational burning in any other city in Western Washington.

Burning garbage and other potential violations. Commenters expressed concerns that allowing recreational fires will increase the burning of garbage.

Under ORCAA's Rule 6.2.5(a), it continues to be unlawful to burn garbage, dead animals, asphalt, petroleum products, paints, rubber products, plastics, paper, cardboard, treated wood, processed wood, construction/ demolition debris, metal, or any substance which when burned releases toxic emissions, dense smoke, or obnoxious odors. Only dry, seasoned firewood or

charcoal and enough clean paper necessary to start a fire may be burned under Rule 6.2.7(b). Trash burning remains a violation of state law and remains a priority for ORCAA's enforcement efforts. ORCAA will continue to respond to complaints regarding burning garbage. ORCAA does issue Notices of Violation for burning garbage, as well as other violations of ORCAA's regulations.

Outdoor burning in homeless camps. Commenters expressed concern about 'survival fires' in homeless camps.

The homeless camp issue is complex. This rulemaking does not specifically address burning by homeless persons, but makes small recreational fires lawful in Lacey, Olympia, and Tumwater. ORCAA supports reduction of burning at these sites, and in the short term this revision allows ORCAA to better focus on eliminating trash burning at the camps. Many of the non-profit organizations and even other government agencies look the other way when it comes to campfires in homeless camps used for cooking and heat – "survival fires" – but at the same time, we are telling homeowners they cannot have a similar campfire. So, the issue is one of uniformity, equal protection of the law and fundamental fairness.

Again, it comes back to where we can best focus our limited resources. This rule amendment will allow ORCAA to focus its resources more effectively on nuisance smoke and trash burning complaints, including areas where unlawful burning is conducted by persons experiencing homelessness, which are impactful on health. The proposed rule change essentially re-emphasizes our strict enforcement of nuisance smoke complaints.

Climate Change Impacts. Commenters suggested that recreational burning will contribute emissions that cause climate change.

As it stands, devices burning fossil fuels – natural gas and propane – are allowed under the existing rule. Though wood burning does create carbon dioxide, the GHG emissions from a campfire is minimal – far less than the GHG emissions from propane or natural gas burning firepits.

Summary

Commenters raised some important issues in response to this rule change. As a Clean Air Agency, ORCAA is focused on reducing air pollution while ensuring residents can enjoy their property and their communities. Recreational fires represent a very small contributor to PM pollution in urban Thurston County. The proposed changes are not expected to affect any measurable impact on the overall PM burden within the community.

ORCAA takes its regulatory role seriously and is not looking to significantly increase the woodsmoke in the air. With Rule 6.2.7(c), ORCAA believes the rule prohibiting recreational burning in Lacey, Olympia, and Tumwater is outdated and provides minimal if any actual reduction in woodsmoke while adding to public confusion.

The proposed rule change would allow recreational fires (i.e., “campfires”) within the city limits of Lacey, Olympia, and Tumwater – making the rules for those cities consistent with all other cities within our jurisdiction and the rules within their own urban growth areas. The air quality regulations regarding nuisance smoke and burning of prohibited materials (i.e., ‘trash’) will remain unchanged. Indeed, the ORCAA compliance efforts would be strengthened in terms of being able to focus more fully on those problem areas of trash burning and nuisance smoke.

As far as fire dangers from this proposal, ORCAA has worked closely with the fire departments of Lacey, Olympia, and Tumwater. They support the proposed rule’s efforts to streamline regulations and focus enforcement on problem areas. The proposed rule change will NOT change local fire safety, zoning, or building code rules. Fire safety will not be impacted by this proposal.

ORCAA’s compliance efforts will continue to focus on enforcement of nuisance smoke and illegal trash burning complaints. ORCAA’s commitment to clean air won’t change, although this proposal will strengthen ORCAA’s ability to focus its resources on problem areas.

Finally, if anyone experiences ANY nuisance smoke or other air quality problems, they should let ORCAA know. As a small agency, ORCAA’s enforcement efforts are driven by complaints – if ORCAA doesn’t hear about problems, it can’t respond to them. By letting ORCAA know about smoke concerns, with as much detail as possible (i.e., when the problem occurs, what the specific problem is, the source of the problem, etc.) ORCAA can respond. People may contact ORCAA by phone at (360) 539-7610, by email at info@orcaa.org, or by using the online complaint form: <https://www.orcaa.org/public-records/online-complaints/>

Appendix B.3

Concise explanatory statement

Concise Explanatory Statement

Olympic Region Clean Air Agency (ORCAA)

Date: January 31, 2023

Per RCW 34.05.325(6), ORCAA must prepare a concise explanatory statement of a rule amendment prior to filing an adopted rule with the code reviser.

The following rule amendment was adopted by the Olympic Region Clean Air Agency (ORCAA) Board of Directors on January 11, 2023:

- *Revise Rule 6.2.7 Recreational Burning* to eliminate the prohibition of recreational fires within the city limits of Lacey, Olympia, Tumwater, and particular unincorporated areas of Thurston County.
- *Revise Rule 6.2.8 Permit Program* to remove the requirement for Native American ceremonial fires within the areas listed above to obtain a written permit.

Identify the agency's reasons for adopting the rule: The ban on recreational fires was enacted more than 20 years ago to help reduce particulate matter pollution levels in Thurston County. This ban once served an important purpose, but the ban is no longer needed for maintaining healthy air quality in Thurston County. Lacey, Olympia, and Tumwater are the only cities in Western Washington that have a ban on recreational fires. Lifting the ban further aligns local and state burning laws. ORCAA retains the ability to regulate problematic recreational fires in our jurisdiction through nuisance smoke and other prohibitions and restrictions (Rule 6.2.5).

Describe the differences between the proposed text and what was adopted and the reasons for the differences: No changes were made to the proposed text.

Summarize the comments received and responses to those comments by subject or category. How does the final rule reflect the comments, or why it failed to do so? ORCAA received 21 written comments and five verbal comments addressing fire danger, wildfire smoke, air quality concerns, potential health impacts, burning garbage, outdoor burning in unincorporated communities, and climate change impacts.

Fire Danger: ORCAA worked closely with the fire agencies of Lacey, Olympia, and Tumwater, as well as the Thurston County Fire Chiefs Association. Those fire officials supported ORCAA's effort to streamline regulations. The final rule as adopted will not change local fire safety, zoning, or building codes. Fire safety will not be impacted by this final rule.

Wildfire Smoke: Impacts from wildfire smoke are outside of ORCAA's control and the purview of this rulemaking. However, ORCAA will continue to monitor air quality and work with state and local health departments during wildfire smoke impact events. This rule does not affect

ORCAA's ability to call Stage 1 or Stage 2 burn bans to prohibit all outdoor burning during a wildfire smoke impact event.

Local Air Quality Concerns: There will be no change to ORCAA's nuisance smoke rules, nor its air quality monitoring program. The US Environmental Protection Agency (EPA) requirements for ambient monitoring recognize the monitor located in the City of Lacey as being indicative of air quality in Thurston County. That location has shown compliance with national ambient air quality standards for the particulate matter standards of PM₁₀ and PM_{2.5} for more than two decades. ORCAA's nuisance smoke regulations will continue to be vigorously enforced to protect local air quality. Additionally, the growing use of personal air monitoring devices, such as the Purple Air device, allows ORCAA staff to 'crowd-source' local air quality monitoring to isolate potential problem areas. If problem areas are identified, ORCAA's compliance and education teams can focus on those areas for targeted responses.

Potential Health Impacts: ORCAA vigorously responds to violations of its nuisance smoke rule. This action alone helps mitigate situations where smoke impacts are localized. Additionally, the type of burning affected by this rule accounts for less than 4 percent of the county-wide emissions according to the Department of Ecology.

Burning Garbage: Burning trash is a violation of state law and remains a priority for ORCAA's enforcement efforts. This final rule will not change ORCAA's response to trash burning complaints and enforcement.

Outdoor Burning in Unhoused Communities: ORCAA recognizes that this is a complex issue. The final rule will allow ORCAA to focus its resources more effectively on nuisance smoke and trash burning complaints. The final rule will also provide camp residents with additional cleaner options for staying warm and for cooking in their survival situation.

Climate Change: ORCAA responded to comments by noting that the contribution from campfires in Lacey, Olympia, and Tumwater is minimal. The final rule does not affect climate change impacts since there are insignificant contributions of greenhouse gas emissions from recreational fires in Lacey, Olympia, and Tumwater, especially considering the alternatives require the burning of fossil fuels (propane and natural gas).

Summary

Commenters raised some important issues that must be considered when looking at this rule change. As a Clean Air Agency, ORCAA is focused on reducing air pollution while ensuring residents can enjoy their property and their communities. Recreational fires represent a very small part of the sources of PM pollution in urban Thurston County. The proposed changes are not expected to have any measurable impact on the overall PM burden within the community.

We take our regulatory role seriously and are not looking to significantly increase the woodsmoke in the air. With Rule 6.2.7(c), we feel we have an outdated regulation that provides minimal if any actual reduction in woodsmoke while adding to the confusion.

The proposed rule change would allow campfires (recreational fires) within the city limits of Lacey, Olympia, and Tumwater – making the rules for those cities consistent with all other cities within our jurisdiction. But the air quality regulations regarding nuisance smoke and burning of prohibited materials (i.e., 'trash') will remain unchanged. Indeed, the ORCAA compliance efforts would be strengthened in terms of being able to focus more fully on those problem areas of trash burning and nuisance smoke.

As far as fire dangers from this proposal, we have worked closely with the fire departments of Lacey, Olympia, and Tumwater. All of them support our efforts to streamline regulations and focus enforcement on problem areas. The proposed rule change will NOT change local fire safety, zoning, or building code rules. Fire safety will not be impacted by this proposal.

ORCAA's compliance efforts will continue to focus on enforcement of nuisance smoke and illegal trash burning complaints. Our commitment to clean air won't change though this proposal could strengthen our ability to focus on those problem areas.

Appendix B.4

Notice of rule adoption



RULE-MAKING ORDER PERMANENT RULE ONLY

CR-103P (December 2017) (Implements RCW 34.05.360)

CODE REVISER USE ONLY
OFFICE OF THE CODE REVISER STATE OF WASHINGTON FILED
DATE: January 31, 2023 TIME: 4:31 PM WSR 23-04-101

Agency: Olympic Region Clean Air Agency
Effective date of rule: Permanent Rules <input type="checkbox"/> 31 days after filing. <input checked="" type="checkbox"/> Other (specify) <u>March 6, 2023</u> (If less than 31 days after filing, a specific finding under RCW 34.05.380(3) is required and should be stated below)
Any other findings required by other provisions of law as precondition to adoption or effectiveness of rule? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, explain:
Purpose: This action is to revoke the ban on recreational fires in the cities of Lacey, Olympia, and Tumwater.
Citation of rules affected by this order: New: Repealed: Amended: ORCAA Regulations Rules 6.2.7, 6.2.8 Suspended:
Statutory authority for adoption: Chapter 70A.15 RCW
Other authority:
PERMANENT RULE (Including Expedited Rule Making) Adopted under notice filed as <u>WSR 22-24-015</u> on <u>11/29/2022</u> (date). Describe any changes other than editing from proposed to adopted version: No changes were made to the adopted version. If a preliminary cost-benefit analysis was prepared under RCW 34.05.328, a final cost-benefit analysis is available by contacting: Name: Address: Phone: Fax: TTY: Email: Web site: Other:

**Note: If any category is left blank, it will be calculated as zero.
No descriptive text.**

Count by whole WAC sections only, from the WAC number through the history note.
A section may be counted in more than one category.

The number of sections adopted in order to comply with:

Federal statute:	New	___	Amended	___	Repealed	___
Federal rules or standards:	New	___	Amended	___	Repealed	___
Recently enacted state statutes:	New	___	Amended	___	Repealed	___

The number of sections adopted at the request of a nongovernmental entity:

New	___	Amended	___	Repealed	___
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The number of sections adopted on the agency's own initiative:

New	___	Amended	___	Repealed	___
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The number of sections adopted in order to clarify, streamline, or reform agency procedures:

New	___	Amended	___	Repealed	___
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The number of sections adopted using:

Negotiated rule making:	New	___	Amended	___	Repealed	___
Pilot rule making:	New	___	Amended	___	Repealed	___
Other alternative rule making:	New	___	Amended	___	Repealed	___

Date Adopted: January 11, 2023	Signature: 
Name: Jeff C. Johnston	
Title: Executive Director	

Appendix B.5

Adopted rule language amendment shown in strikethrough text

Washington State Register

WSR 23-04-101

WSR 23-04-101
PERMANENT RULES
OLYMPIC REGION
CLEAN AIR AGENCY

[Filed January 31, 2023, 4:31 p.m., effective March 6, 2023]

Effective Date of Rule: March 6, 2023.

Purpose: This action is to revoke the ban on recreational fires in the cities of Lacey, Olympia, and Tumwater.

Citation of Rules Affected by this Order: Amending ORCAA Regulations Rules 6.2.7 and 6.2.8.

Statutory Authority for Adoption: Chapter 70A.15 RCW.

Adopted under notice filed as WSR 22-24-015 on November 29, 2022.

Date Adopted: January 11, 2023.

Jeff C. Johnston
Executive Director

AMENDED SECTION

Rule 6.2.7 Recreational Burning

The following burn practices must be used for recreational burning where allowed.

(a) Maximum pile size is three (3) feet in diameter and two (2) feet high.

(b) Only dry, seasoned firewood or charcoal and enough clean paper necessary to start a fire may be burned.

~~((c) No recreational fires are allowed within the city limits of Lacey, Olympia, and Tumwater, and unincorporated areas of Thurston County lying within or between the municipal boundaries of these cities. Charcoal, propane, or natural gas may be used without a permit.))~~

AMENDED SECTION

Rule 6.2.8 Permit Program

ORCAA may consult with fire protection authorities, conservation districts, or counties to determine if any of these agencies are capable and willing to serve as the permitting agency and/or enforcing agency for specific types of burning. Permitting agencies may use, as appropriate, a verbal, electronic, written, or general permit established by rule, for any type of burning that requires a permit.

(a) Permitting agencies may deny an application or revoke a previously issued permit if it is determined that the application contained inaccurate information, failed to contain pertinent information or the permitted activity has caused a nuisance.

(b) Failure to comply with any term or condition of a permit constitutes a violation of this rule and is subject to penalties pursuant to RCW 70A.15.3150 and RCW 70A.15.3160.

(c) Types of burning that require a written permit.

(1) Agricultural burning must abide by Rule 6.2 and all conditions of the written permit issued by ORCAA or another permitting agency.

(2) Fire training fires, except as provided in RCW 52.12.150, may be conducted provided all the following requirements are met:

(i) Fire training must not occur during a burn ban.

(ii) The fire must be for training.

(iii) The agency conducting the training fire must obtain any permits, licenses, or other approvals required by any entity for such

Certified on 2/9/2023

[1]

WSR 23-04-101

training fires. All permits, licenses, and approvals must be kept on-site and available for inspection.

~~((3) Native American ceremonial fires within the city limits of Olympia, Lacey, and Tumwater and unincorporated areas of Thurston County lying within or between the municipal boundaries.))~~

~~((4))3) Land Clearing Burning requires an approved written permit. Conditions of the written permit issued by ORCAA, or another permitting agency are enforceable.~~

~~((5))4) Storm and flood debris resulting from a declared emergency by a governmental authority may be burned within two years of the event (storm). Burning must abide by Rule 6.2 and all conditions of the written permit issued by ORCAA or another permitting agency.~~

~~((6))5) Weed abatement fires.~~

~~((7))6) Residential fires in Thurston County.~~

The permit application for the above permits must be accompanied by the applicable fee, pursuant to Rule 3.4.

(d) Where residential burning is allowed and no written burn permits are issued, burning must abide by Rule 6.2 and the following:

(1) Maximum pile size is four (4) feet in diameter and three (3) feet high.

(2) Only one pile may be burned at a time, and each pile must be extinguished before lighting another.

(3) Only natural vegetation may be burned.

(4) No fires are to be within fifty (50) feet of structures or within five hundred (500) feet of forest slash.

(5) No tree stumps may be burned.

Appendix C

Additional ORCAA public outreach

- C.1. List of meetings in which the rule amendment was discussed
- C.2. Focus sheet and focus sheet addendum on recreational fires
- C.3. Information featured on the ORCAA website
- C.4. PowerPoint presentation provided to Lacey City Council
- C.5. List of Tribal contacts subscribed to receive ORCAA email updates

Appendix C.1

List of meetings in which the rule amendment was discussed

ORCAA Rule Change – Amending sections 6.2.7 and 6.2.8 regarding eliminating the ban on recreational burning in Lacey, Olympia, and Tumwater

ORCAA's proposed rulemaking was discussed at the following meetings:

June 21, 2022 – Meeting with Lacey Fire Department and Lacey City Officials

Participants: Jeff Johnston, Robert Moody & Dan Nelson; Chief Steve Brooks & Jennifer Schmidt (Lacey Fire District 3); Terry McDaniel & Asher Cabe (City of Lacey)

June 24, 2022 – Meeting with Thurston Fire Chiefs Association Executive Board

Participants: Jeff Johnston & Dan Nelson, Chiefs Brian Van Camp, Steve Brooks & Leonard Johnson

August 1, 2022 – City and County Managers Meeting

Participants: Jeff Johnston & Dan Nelson; Scott Spence, Lacey City Manager; John Doan, Tumwater City Manager; Andrew Neidtz, former City Manager of Lakewood and Sumner.

September 12, 2022 – Meeting with Olympia Fire Department

Participants: Jeff Johnston; Chief Todd Carson, Interim Assistant Fire Chief Mike Buchanan, Interim Fire Marshal Randy Haines

September 15, 2022 – Meeting with Tumwater Fire Department

Participants: Jeff Johnston; Acting Tumwater Fire Chief Brian Hurley

September 28, 2022 – Monthly meeting of the Thurston Fire Chiefs Association

Participants: Jeff Johnston, Robert Moody, Thurston County Fire Chiefs, and variety of allied agencies and partners.

December 7, 2022 – Monthly meeting of the Thurston Fire Chiefs Association

Participants: Jeff Johnston, Thurston County Fire Chiefs, and variety of allied agencies and partners.

December 8, 2022 – Lacey City Council Work Session

Participants: Jeff Johnston, Dan Nelson, Chief Steve Brooks (Lacey Fire District 3), Lacey City Council

[Lacey City Council Worksession - December 8, 2022 - YouTube](#)

Public events / discussions:

September 2-4, 2022 – Olympia Harbor Days Festival

Participants: Dan Nelson, Jeff Johnston, assorted staff. Informal conversations with countless members of the community.

[https://stateofwa-my.sharepoint.com/personal/lkil461_ecy_wa_gov/Documents/SIPs/ORCAA SIP Revision/Appendices/ORCAA/ORCAARuleChange_DocumentingOutreach.docx](https://stateofwa-my.sharepoint.com/personal/lkil461_ecy_wa_gov/Documents/SIPs/ORCAA%20SIP%20Revision/Appendices/ORCAA/ORCAARuleChange_DocumentingOutreach.docx)

Appendix C.2

Focus sheet and focus sheet addendum on recreational fires



Focus on Recreational Fires

Proposed rule revisions re: Campfires in Lacey, Olympia, & Tumwater

Situation

During late 1980s, urban Thurston County exceeded federal ambient air quality standards for Particulate Matter (PM₁₀) pollution. One of the tools the EPA approved for improving air quality was a ban on ALL forms of wood burning – including small recreational fires – in the cities of Lacey, Olympia, and Tumwater.

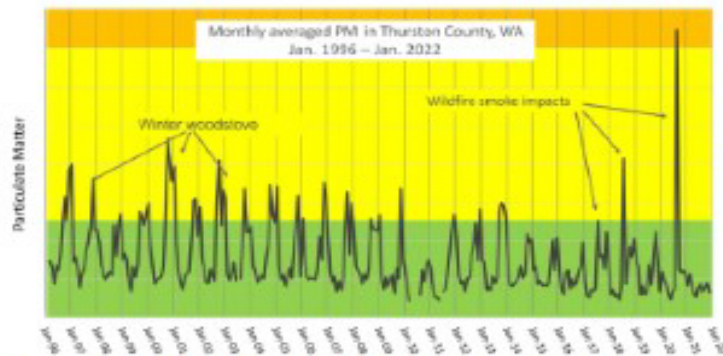
Air quality monitoring data shows that the high levels of particulate matter in urban Thurston County were caused primarily by wood stoves used for home heating – the highest concentrations were measured in between November and March each year.



Air Quality Background

The unhealthy levels of particulate matter (PM) pollution in the 1980s and 1990s stemmed largely from the use of wood burning devices for home heating during the cooler months. That is, *the use of woodstoves and fireplaces accounted for the worst air pollution periods each year*. To resolve the problem, however, all forms of burning, regardless of season, were targeted for smoke reduction, including outdoor recreational fires in the warm months. ORCAA and the Department of Ecology (ECY) successfully addressed the task of staying within federal air quality standards largely by tightening standards on wood stoves, creating a wood stove replacement program, and reducing residential yard waste burning.

Over the last decade, ORCAA has used funding from a state Wood Smoke Reduction Grant program to remove more than 628 old, uncertified wood stoves in Thurston County, primarily within the three cities and their urban growth areas (UGAs). The total PM levels have declined substantially since 1996. See figure below.



The ban on recreational fires within the three Thurston County cities has outlived its usefulness. Today, that ban creates an extra layer of rules that complicates enforcement efforts of ORCAA, fire departments, and law enforcement. By removing the recreational fire ban, ORCAA and Thurston County Fire agencies can focus on specific smoke and fire problems. All city and county fire safety regulations as well as ORCAA's nuisance smoke rules will remain unchanged.



Focus on Recreational Fires

Proposed rule revisions re: Campfires in Lacey, Olympia, & Tumwater

Key Facts

- The problem that resulted in the ban on recreational fires occurred more than 20 years ago.
- The cause of the problem was wood smoke in general, and more specifically, indoor wood burning for home heating.
 - The use of woodstoves and fireplaces historically account for the worst air pollution periods annually.
 - Outdoor burning contributes to the overall PM pollution levels, but the most severe episodes of elevated PM levels occur during the winter months when outdoor burning is less frequent, while indoor burning is common.
 - In recent years, wildfire smoke – sometimes generated as far away as California, Montana, and northern British Columbia – has caused elevated PM levels during summer months, when local fires may be banned for fire safety reasons.
- The ban is no longer needed for maintaining healthy air quality in our area.
 - Recreational fires had a very minor impact on overall PM levels, but their ban was included in the rules merely to maintain a broad and fair approach to meeting air quality standards.
 - Lifting the ban on recreational fires makes it easier to focus on actual smoke and fire violations.
 - Lifting the ban on recreation fires in the three cities brings local burning rules into alignment with state laws and makes them consistent across ORCAA's jurisdiction.
 - Lacey, Olympia, and Tumwater are the *only* cities in Western Washington that have a ban on recreational fires.
 - Cities may enact local ordinances and code updates to ensure fire safety remains top priority. For example, many western Washington cities include 15- to 25-foot setbacks from existing structures and/or trees for recreational fires.
 - Any Burn Bans called for fire safety or air quality reasons override any fire allowance.



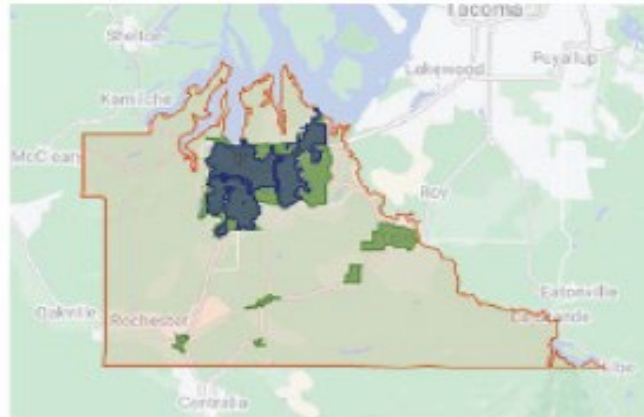


Focus on Recreational Fires

Campfires in Lacey, Olympia, & Tumwater Addendum

Outdoor Burning Rules in Thurston County vary by location

1. Throughout ALL of Thurston County (see area **marked in red**) burning any trash, construction debris, or other 'prohibited materials' is illegal, as is the use of burn barrels at any time. This is a state-wide law.



2. Within all Cities and designated Urban Growth Area (UGA) boundaries, (see area **marked in green**) residential yard waste burning and land clearing burning is prohibited.

3. With the Cities of Lacey, Olympia, and Tumwater (see area **marked in blue**) only, Recreation Fires are prohibited.


- Lifting the permanent ban has no impact on fire safety standards and regulations.
 - State and local laws and regulations regarding fire safety will not be impacted.
 - Cities that would like to keep some form of ban on recreational fires may create their own ordinances based on fire safety regulations, or zoning codes.
- Anyone burning is still responsible for their smoke and all nuisance smoke regulations remain in effect.
 - The Washington Clean Air Act will still be fully enforceable, meaning nuisance smoke, trash burning, and use of burn barrels are STILL illegal. Yard waste burning is still illegal in all cities and Urban Growth Areas under the state Clean Air Act.

Appendix C.3

Information featured on the ORCAA website

ORCAA Board votes to update campfire rules for Lacey, Olympia, and Tumwater

February 27, 2023 Share: [f](#) [t](#) [e](#) [m](#)



The ORCAA Board of Directors, during the January 11, 2023, meeting voted to revise ORCAA's rules concerning recreational fires, i.e., 'campfires', within the cities of Lacey, Olympia, and Tumwater.

- [Recreational Fires Focus Sheet](#)

The vote came after the Board considered multiple written comments received in the weeks prior to the meeting, and after hearing several public comments during the Public Hearing that was part of the meeting.

- [Public Comments Received](#)
- [ORCAA's Response to Comments](#)

The Board voted to adopt the revisions to Rules 6.2.7c and 6.2.8 that removes the blanket ban on campfires in Lacey, Olympia, and Tumwater, making the rules for those cities consistent with all other cities within ORCAA's jurisdiction.

The updated rules will be effective as of March 6, 2023.

The rule change removes the extra layer of regulation that was unique to those cities while retaining rules that ban nuisance smoke and fire hazards. The revision will allow both ORCAA compliance officers and fire officials within those cities to focus on the true problem burns rather than simple rule violations. ORCAA has worked closely with the fire departments of Lacey, Olympia, and Tumwater. These agencies support the rule revision as a positive step to streamline regulations and focus enforcement on problem areas. The rule change does NOT change local fire safety, zoning, or building code rules.

ORCAA's compliance efforts will continue to focus on enforcement of nuisance smoke and illegal trash burning complaints. ORCAA's commitment to clean air won't change, although this proposal will strengthen ORCAA's ability to focus its resources on problem areas. The brochure linked below contains information about the responsibilities for those who do choose to have backyard campfires and easy ways to reduce smoke from these fires.

- [Best Practices for Clean Burning Recreational Fires/Campfires](#)

If anyone experiences ANY nuisance smoke or other air quality problems, they should let ORCAA know. As a small agency, ORCAA's enforcement efforts are driven by complaints. If ORCAA doesn't hear about problems, it can't respond to them. By letting ORCAA know about smoke concerns, with as much detail as possible (i.e., when the problem occurs, what the specific problem is, the source of the problem, etc.) ORCAA can respond. People may contact ORCAA by phone at **(360) 539-7610**, by email at info@orcaa.org, or by using the [online complaint form](#).


Appendix C.4

PowerPoint presentation provided to Lacey City Council

Revising Recreational Fire Rules
Lacey, Olympia, Tumwater



Presentation to Lacey City Council Work Session
December 8, 2022

Jeff Johnston, Executive Director


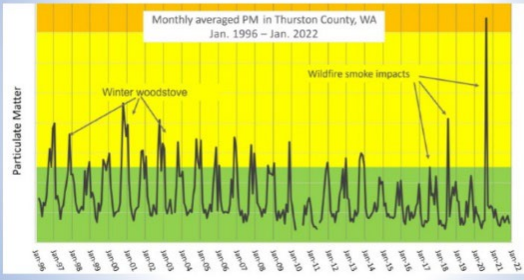


Background

- 1980s – Thurston County exceeds air quality standards
- Source of pollution was primarily indoor burning for home heating.
- Rules were put in place to return to, and then stay within, those standards.



Pollution levels have declined over the past 25 years



ORCAA's Goal –

Reduce confusion and
focus on education



Timeline for the rule change

- Spring, Summer, Fall 2022 –
*Meetings with city staff and leadership
as well as fire officials and police.
Informal public outreach at community
events*
- December/January 2022-23 –
Public Comment Period open
- January 11, 2023
Public Hearing with ORCAA Board
- February or March 2023
Rule change becomes effective



Questions?

Olympic Region Clean Air Agency (ORCAA)
(360) 539-7610

Jeff Johnston, Executive Director
Jeff.Johnston@orcaa.org

Dan Nelson, Communications Manager
Dan.Nelson@orcaa.org

Robert Moody, Compliance Manager
Robert.Moody@orcaa.org



Appendix C.5

List of Tribal contacts subscribed to receive ORCAA email updates

Nisqually

David Trout, Natural Resources Dir.
(360) 456-5221
troutt.david@nisqually-nsn.gov

Squaxin Island

Candace Penn, Climate Change Ecologist,
(360) 432-3898,
cpenn@squaxin.us

Jeff Dickison, Natural Resource Director,
(360) 432-3815,
jdickison@squaxin.us

Confederated Tribes of the Chehalis Reservation

Glen Connelly, Director of Natural Resources
360-273-5911
cdnr@chehalistribe.org

Appendix D

ORCAA coordination with EPA prior to rule adoption

D.1 ORCAA technical demonstration to EPA to remove ORCAA Rule 6.2.7(c) from the SIP

D.2 EPA response letter to the ORCAA technical demonstration

Appendix D.1

ORCAA technical demonstration to EPA to remove ORCAA Rule 6.2.7(c) from the SIP

Request to remove ORCAA Rule 6.2.7(c) from the SIP

As part of the 2013 second 10-year Limited Maintenance Plan update for the Thurston County Particulate Matter (PM10) area, Ecology in coordination with ORCAA submitted ORCAA rule 6.2.7(c) regarding recreational fires in the SIP. Upon further review, ORCAA has determined that rule 6.2.7(c) is not germane to the wintertime PM10 episodes that originally drove nonattainment in the area, nor is it germane to the control measures contained in the attainment plan and original maintenance plan.

Specifically, recreational fires are a very small subset of overall open burning. However, even with respect to general open burning, in the final approval of the Thurston County PM10 attainment plan (58 FR 40056, July 27, 1993), EPA stated in the response to comments, “EPA received only one comment on its March 12, 1993, (58 FR 13575-13579) Federal Register proposal to approve the Thurston County moderate nonattainment area PM10 SIP as a revision. An April 12, 1993, letter from Ecology pointed out that the EPA incorrectly proposed to approve a Washington State regulation on open burning (Chapter 173-425 WAC) which bans all outdoor burning in all PM10 or CO nonattainment areas. Ecology noted that the regulation has not been submitted to EPA as a SIP revision. After further review, EPA has determined that Ecology is correct, and that on January 15, 1993 (58 FR 4579), EPA adopted the October 18, 1990, version of Chapter 173—425 WAC. The 1990 version is the most recently submitted and does not include the open burning ban in nonattainment areas. EPA will continue to include the October 18, 1990, version in the Washington State Implementation Plan. The regulation is not relied on to attain or maintain the PM10 standards, therefore not including an outdoor burning ban in the Thurston County SIP revision will not impact the approvability of the revision.” Additionally, ORCAA has reviewed the 1999 maintenance plan, and recreational fires were not a component of the control measures relied on to demonstrate maintenance (65 FR 59128, October 4, 2000). For the reasons set forth below, we are requesting that the EPA correct the inadvertent error in our 2nd 10-year Limited Maintenance Plan submittal and remove rule 6.2.7(c) from the SIP for ORCAA’s jurisdiction.

Rule 6.2.7(c) is not germane to the wintertime PM10 episodes that originally drove nonattainment

In the 1988 SIP development process the choice for control of emissions was limited to restricting the use of wood stoves during poor air quality. The subsequent 1991 SIP supplement also stated that wood stoves were the primary contributor to poor air quality. The Redesignation Request and Maintenance Plan (MPlan) approved in 2000 concluded “Most source categories, except for residential wood burning and road dust, are not significant contributors to PM10 emissions and subsequent concentration in Thurston County.” As part of the computer model validation exercise in the MPlan, PM10 emissions for the burn ban on January 2, 1995, were reviewed. Wood burning accounted for 80 percent of the emissions; outdoor burning was less than 1 percent. The MPlan also estimated emissions for 2010. The annual PM10 emissions estimates were 1,441 tons per year (tpy) from woodburning and 22 tpy

from outdoor burning. The MPlan supported curtailment of wood burning during air pollution episodes as the major control measure to maintain the NAAQS in Thurston County.

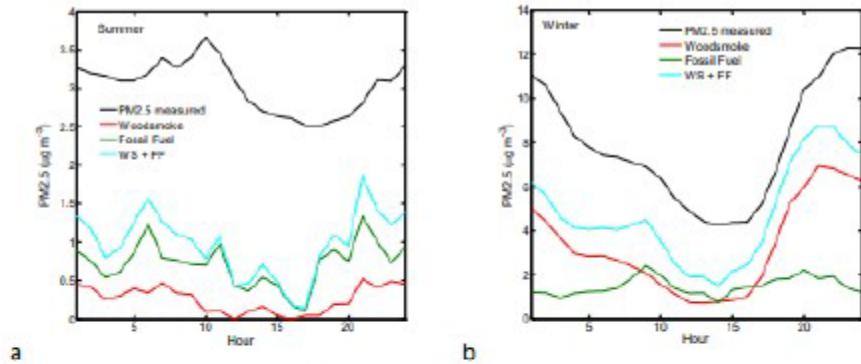
As part of a PM10 saturation study a group of filters were analyzed for elemental and organic carbon. The filters were collected on two days in January 1995 from sites on the opposite ends of the non-attainment area. The results indicated low temperature combustion was very similar across the nonattainment area. Hourly Tapered Element Oscillating Microbalance data collected at Mt View Elementary on those days show the classic diurnal pattern of wood stove usage indicating the carbon was most likely generated by wood stove combustion.¹

The second 10-year MPlan for Thurston County was incorporated in the SIP in 2013. The plan supported maintenance of the NAAQS with the existing control measures. "Wood smoke is the most significant source of PM10 in Thurston County in the winter. ORCAA and Ecology relied upon Reasonably Available Control Measures for residential wood combustion to return the area to compliance with the 1987 PM10 standard. Ecology and ORCAA have continued to implement the control measures included in the attainment and earlier maintenance plans. The control measures include:

- Curtailment program during impaired air quality
- Certification of new wood stoves
- Rules that govern the sale and transfer of uncertified stoves
- Opacity limits
- Fuel restrictions²

Aethalometer data collected during the 2015-2017 Thurston County PM2.5 Saturation Study provided hourly-resolved organic and black carbon contribution to the total PM2.5 concentration. The organic carbon associated with low temperature wood combustion shows a clear diurnal pattern in the winter months. Between October and March wood stoves are used primarily for home heating from early evening through morning hours. Wood stove use is more sporadic the rest of the year. The aethalometer data during summer months remains relatively steady throughout the day at one fourth the wintertime peak nighttime concentrations. This corresponds to the time of year when outdoor burning, including recreational fires, is most common. This demonstrates that outdoor burning does not significantly contribute to ambient PM2.5 concentrations in winter. The study concluded that Mt. View was representative of air quality in Thurston County. The following conclusion is from that report.

"The monitoring site at Mountain View Elementary [MTV] continues to be generally representative of air quality in Thurston County. During cold stagnant periods, the number of wood stoves in the cities and UGAs will cause higher PM2.5 concentrations than outdoor burning."³



Average hourly PM2.5 in a) summer and b) winter at Lacey, Washington.

October through March are considered the wood stove heating season in Thurston County. Six months of wood stove emissions claim 40 percent of the annual emissions. Outdoor burning is generally a fair-weather activity usually peaking in frequency for “spring cleanup”. Recreational burning as a subset of outdoor burning is associated with fair weather. If we consider the usual backyard social event with a BBQ and people getting together and perhaps in the evening sitting around a fire, those generally happen in the warmer months of the year which are opposite of the wood stove season use.

There are several explanations for the improved air quality. The Redesignation Request estimated 111,477 households with 29,541 heating with wood in 2010. The 2010 United States Census Bureau data for Thurston County stated 96,702 residences with 6,292 wood burning households. U.S. Census estimates for 2021 indicate 117,186 households with 4,453 heating with wood. The use of wood stoves for heat is declining.

The Washington State Department of Ecology has provided ORCAA grants for multiple years to fund removal of older wood stoves, many of which came out of Lacey, Olympia, and Tumwater. Between 2011 and 2022 over 700 wood stoves have been removed from circulation. Though some of those may have installed a new wood stove with reduced emissions, the emission reduction is still substantial.

No local air agency in western Washington restricts recreational fires in their jurisdiction.

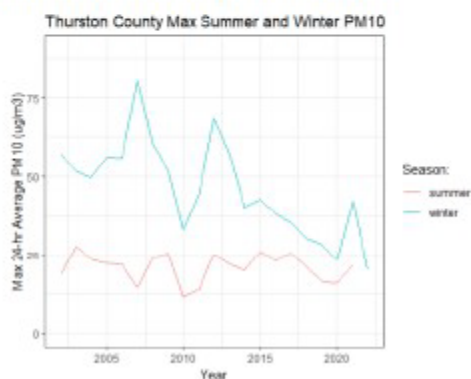
ORCAA has gone through the public process to remove the ORCAA Rule 6.2.7(c) from our Regulation. The change was published in the Washington State Register and the removal was official on March 6, 2023.

The nonattainment area was described in the Federal Register as the city limits of Lacey, Olympia, and Tumwater. In 1989 the cities encompassed 25,459 acres.⁴ In 2022 the area of the three cities had grown to 35,638 acres.⁵ The nonattainment area was specified as the city limits

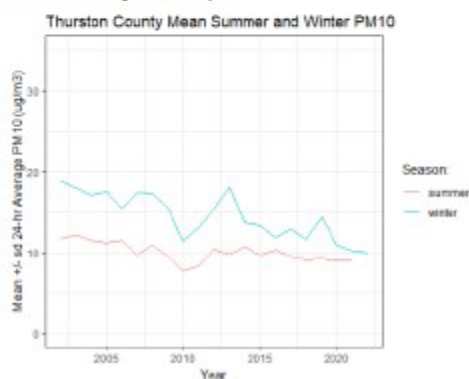
that existed at the time. Growth has expanded the burn restrictions well outside of what was specified in the 1991 approved SIP.

To the extent that Rule 6.2.7(c) may (arguably) have impacted wintertime PM10 episodes in the past, we note the following updated control measures approved in the SIP (ORCAA RULE 8.1 WOOD HEATING) provide significantly greater offsetting emissions reductions as shown in the graph and discussion below.

Max summer and winter PM10



Mean summer and winter PM10 (different y-scale)



The Thurston County nonattainment area was identified in 1988 for exceeding the PM10, 24-hour average National Ambient Air Quality Standard (NAAQS). The PM10 NAAQS is 150 ug/m3 on a 24-hour average. The annual PM10 NAAQS has never been an issue. With the issuance of the PM2.5 standard, it has become the controlling standard for Thurston County. The PM2.5 ambient air quality standard is 35 ug/m3 on a 24-hour average. State Implementation Plans (SIP) for Thurston County were approved by EPA in 1989, 1991, 2000, and 2013. Each SIP update concluded that wood stove emissions caused the exceedance of the NAAQS.

Rule 6.2.7 Recreational Burning was added to the SIP in 2013. This proposal is to remove 6.2.7(c) from the SIP. Maintaining Rule 6.2.7 (a) and (b) continue to support improved air quality. Combined, they limit the size of recreational fires to a maximum of three feet across and two feet high and the fuel must be clean dry seasoned firewood. A small campfire with dry wood burns with a minimum of particulate matter. This is important and would remain federally enforceable. ORCAA effective version 3/18/11 and EPA effective date is 11/4/13.

The Revised Code of Washington banned residential and land clearing burning within the city limits in 1991. The restrictions were expanded to the Urban Growth Area (UGA) surrounding those cities in 2000. ORCAA included a permanent ban on land clearing burning and residential burning in the cities of Lacey, Olympia, and Tumwater and their associated UGAs that surround the city limits. Air Quality burn bans, issued for wood stove use, also stop outdoor burning

when air quality is poor. These regulations can be found in ORCAA Rules 6.2.3 and 6.2.6 that were added to the SIP on October 13, 2013 (78 FR 61188).

The contingency plan for Thurston County focused on outlawing uncertified wood stoves if the area failed to make progress toward attainment. It didn't recommend any additional sanctions, such as restrictions on outdoor burning. The contingency plan, contained in ORCAA Rule 8.1.4 Curtailment was adopted into the SIP on October 3, 2013 (78 FR 61188).

Impaired Air Quality Curtailments are utilized as necessary to limit wood stove use during elevated air quality readings. The Curtailments are also applied to all forms of outdoor burning. This is in the SIP other as 173-400 and Regulation 8.

Table of PM10 Design Values

Wood stoves and fireplaces used for winter heating have always been the driving cause of burn bans in Thurston County. This has been supported through several studies and is correlated with monitoring data. Except for recent wildfire smoke intrusions, the highest monitoring values have been in the winter months.

As part of the Thurston County 2nd Maintenance Plan, ORCAA was required to report the Design Value estimates for the Lacey-College Street nephelometer site (53670013). The PM10 SIP Development Guidance document was used for this process. In the table below the Year Ending is for both the 3-year and 5-year values. For example, the 3-year value ending in 2012 included the years 2010, 2011, and 2012. The 5-year value ending in 2012 included 2008, 2009, 2010, 2011, and 2012.

Year Ending	3-year	5-year
2012	43	45
2013	45	45
2014	43	45
2015	42	43
2016	39	43
2017	46	45
2018	74*	62*
2019	74*	62*
2020 Full data set	149*	114*
2020 Excluding flagged data	74	69

*Data were strongly influenced by wildfire smoke intrusions from outside the region.

References

1. Moody, R.T.; Werner, J.P. PM10 Saturation Study Thurston County, Washington. 1997.
2. Department of Ecology State of Washington. SIP Revision for the Thurston County, Washington: Second 10-Year Limited Maintenance Plan for PM10 [13-02-008]. 2013.

3. Hadley, O. PM2.5 Saturation Study Thurston County, Washington: October 2015 through January 2017. 2021. https://www.orcaa.org/wp-content/uploads/TC_ss_Final-Report_final-1.pdf.
4. Mauck, C. Thurston Regional Planning Council. Email to Robert Moody, ORCAA. May 12, 2023.
5. Thurston Regional Planning Council. <https://www.trpc.org/635/Land-Area-and-Annexations>. 2023.

Appendix D.2

EPA response letter to the ORCAA technical demonstration



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

AIR AND RADIATION
DIVISION

August 9, 2023

Mr. Cooper Garbe
Air Quality Program
Washington State Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Mr. Robert Moody
Compliance Manager
Olympic Region Clean Air Agency
2940 Limited Lane NW
Olympia, Washington 98502

Dear Mr. Garbe and Mr. Moody:

We completed our review of your request to remove Olympic Region Clean Air Agency (ORCAA) Rule 6.2.7(c) from the Washington State Implementation Plan and the corresponding demonstration to show that the revision would not interfere with any applicable requirement concerning attainment, reasonable further progress, or any other applicable requirement of the Clean Air Act. We have concluded that the updated version of ORCAA Rule 6.2.7 *Recreational Burning*, effective March 6, 2023, would likely be approvable for incorporation into the State Implementation Plan. However, we note that our final decision on approval of the submission will be based on our review of the complete submission following your public process, the laws and policies in effect at the time of our action, and consideration of any comments we receive as part of the EPA public process.

If you have any questions, please feel free to contact Jeff Hunt, staff lead, at (206) 553-0256.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gina Bonifacino".

Gina Bonifacino
Air Planning Section Manager

Appendix E

Public notice and opportunity for involvement on draft SIP revision (Ecology)

- E.1. Notice posted on Ecology website
- E.2. Notice provided through Ecology's email distribution list
- E.3. Notice posted on ORCAA website
- E.4. Legal notices and affidavits of publication

Appendix E.1

Notice posted on Ecology's website

The screenshot shows the Washington Department of Ecology website. The header includes the department logo and navigation links for Regulations & Permits, Research & Data, Blog, and Contact Us. A secondary navigation bar lists Home, Air & Climate, Water & Shorelines, Waste & Toxics, and Spills & Cleanup. The main content area is titled "Infrastructure, rule, & program plans" and includes a breadcrumb trail: Regulations & Permits > Plans & policies > State implementation plans > Infrastructure, rule, & program plans. A sidebar on the left lists "Plans & policies" with sub-items: State implementation plans, Attainment SIPs, Infrastructure, rule, & program plans (highlighted), Maintenance SIPs, and Transportation conformity. The main text explains that the department submits plans to the EPA to meet national air quality standards. A callout box titled "I want to..." offers three options: learn about the regional haze state implementation plan, find out about Washington's air quality targets, and sign up for email updates. Below this is a "Public comment" section with a brief description of proposed revisions. At the bottom, there is a table with two columns: "State Implementation Plan documents" and "Comment or request a public hearing". The table provides details on the public comment period (February 8, 2024 - March 17, 2024), a public hearing on March 12, 2024, and contact information for Linda Kildahl. An accessibility notice is also present at the bottom of the table.

DEPARTMENT OF
ECOLOGY
State of Washington

Regulations & Permits | Research & Data | Blog | Contact Us

Home | Air & Climate | Water & Shorelines | Waste & Toxics | Spills & Cleanup

Regulations & Permits > Plans & policies > State implementation plans > Infrastructure, rule, & program plans

Plans & policies

- State implementation plans
- Attainment SIPs
- Infrastructure, rule, & program plans**
- Maintenance SIPs
- Transportation conformity

Infrastructure, rule, & program plans

We submit plans, as well as state and local rules, to EPA that show Washington has tools in place to meet national air quality standards. Once approved by EPA, these plans for infrastructure, rules, and programs become part of Washington's State Implementation Plan (SIP) for air quality. Plans and rules in Washington's State Implementation Plan are enforceable by EPA and the public.

I want to...

- Learn about the regional haze state implementation plan
- Find out about Washington's air quality targets
- Sign up for email updates about current projects

Public comment


We propose revisions to Washington's State Implementation Plan for air quality. These revisions show Washington's ability to attain, maintain, enforce, and implement federal air quality standards through infrastructure requirements and updated rules.

Open public comment	Closed public comment
State Implementation Plan documents <p>We propose to send EPA the revised air quality SIP to include Olympic Region Clean Air Agency's updated rules.</p> <ul style="list-style-type: none">Washington State Implementation Plan Revision: Including Revised Olympic Region Clean Air Agency's rules	Comment or request a public hearing <p>Public comment period: February 8, 2024 - March 17, 2024 Comment online</p> <p>Mail comments to: Linda Kildahl, Air Quality Program Washington Department of Ecology P.O. Box 47600, Olympia, WA 98504-7600</p> <p>Public hearing: March 12, 2024, 10 a.m. online (webinar) Register for the webinar to get your meeting ID and passcode.</p> <p>For more information, contact Linda Kildahl at 360-706-3038.</p>

Accessibility
To request ADA accommodation for the public hearing, email [ADA coordinator](#) or call 360-407-6831, 711 (relay service), or 877-833-6341 (TTY).

Appendix E.2

Notice provided through Ecology's email distribution list



Opening of Public Comment Period on Proposed SIP Revision

Ecology is proposing to submit to the Environmental Protection Agency (EPA) a revision to Washington's Air Quality State Implementation Plan (SIP) to include updates to the Olympic Region Clean Air Agency (ORCAA) air quality rules.

To ensure ORCAA's rules are federally enforceable, the federal Clean Air Act requires they be submitted as SIP revisions to EPA. Ecology is the delegated agency for submitting revisions to the Washington SIP.

Ecology invites the public to provide comments on whether we should submit the proposed SIP revision to EPA.

- View the proposed SIP revision (public review draft) at our [Infrastructure, rule and program plans webpage](#).

Public comment period

- February 8 to March 17, 2024

Online public hearing

- March 12, 2024, at 10:00 a.m.
- [Register for the public hearing](#)

To submit or view comments:

- [Comment online](#)
- Mail to: Linda Kildahl, Department of Ecology, P.O. Box 47600, Olympia, WA 98504-7600
- Testify at the public hearing on March 12, 2024

Background

ORCAA's Board of Directors adopted the rule updates on January 11, 2023, and they took effect on March 6, 2023.

The rule updates removed the prohibition on recreational fires (e.g. small campfires) in the cities of Olympia, Lacey, and Tumwater in Thurston County, Washington. No other areas in ORCAA's jurisdiction were affected.

The prohibition on recreational fires had been in effect in the cities of Olympia, Lacey, and Tumwater since March 2011. ORCAA has since determined that the recreational fire prohibition is no longer needed to attain or maintain national ambient air quality standards for coarse particulates (larger particles or PM10) in these areas. The removal of this prohibition makes the rules on recreational fires for these cities consistent with all other cities in ORCAA's jurisdiction.

No new rules, requirements, or changes to existing state or local rules are being proposed.

More Information

Contact Linda Kildahl, Air Quality Planner, Department of Ecology, at (360) 706-3038, or at linda.kildahl@ecy.wa.gov

To learn more about the Washington State Implementation Plan, including its purpose and Ecology's role, please refer to Ecology's [Infrastructure, rule, and program plans webpage](#).

Spanish

Ecología está proponiendo presentar una revisión del Plan de Implementación del estado de Washington a EPA para reflejar normas actualizadas de calidad del aire que han sido adoptadas por Olympic Region Clean Air Agency.

Puede revisar y comentar sobre el documento en <https://ecology.wa.gov/regulations-permits/plans-policies/state-implementation-plans/infrastructure-sips>

Comuníquese con Linda Kildahl al 360-706-3038 para obtener más información o para solicitar asistencia ADA.

Korean

주 환경부는 올림픽지역 청정공기청이 채택한 업데이트된 공기질 규칙을 반영하기 위해 워싱턴주 시행계획의 개정안을 EPA에 제출할 것을 제안하고 있습니다.

<https://ecology.wa.gov/regulations-permits/plans-policies/state-implementation-plans/infrastructure-sips>https://ecology.wa.gov/regulations-permits/plans-policies/state-implementation-plans/infrastructure-sips?utm_medium=email&utm_source=govdelivery에서 문서를 검토하고 의견을 제시하세요.

자세한 내용을 알아보거나 장애인 서비스를 요청하려면 담당자(Linda Kildahl: 360-706-3038)에게 문의하세요.

Vietnamese

Bộ Môi Sinh đang đề xuất đề trình bản sửa đổi Kế hoạch Thực hiện Tiểu bang của Washington lên EPA để chiểu lại các quy định cập nhật chất lượng không khí đã được Cơ quan Không khí Sạch Khu vực Olympic thông qua.

Xem xét và góp ý cho tài liệu tại <https://ecology.wa.gov/regulations-permits/plans-policies/state-implementation-plans/infrastructure-sips>

Liên hệ với Linda Kildahl theo số 360-706-3038 để biết thêm thông tin hoặc yêu cầu hỗ trợ cho người khuyết tật ADA.

Chinese

生态管理署提出向美国环保局EPA提交修订版《华盛顿州实施计划》，该《计划》反映奥林匹克地区清洁空气机构采用的最新空气质量规则。

请使用下方链接查阅和评论该文件：<https://ecology.wa.gov/regulations-permits/plans-policies/state-implementation-plans/infrastructure-sips>

如需更多信息或请求 ADA 帮助，请致电 360-706-3038 联系 Linda Kildahl。

Accessibility

To request an ADA accommodation, including printed materials in a format for the visually impaired, please contact Ecology at 360-280-4325 or ecyadaordinator@ecy.wa.gov.

Persons with impaired hearing may call Washington Relay Service at 711. Persons with a speech disability may call TTY at 877-833-6341.

[Subscribe/Unsubscribe](#)

[Our Website](#)

[Accessibility](#)

Follow Us:



Appendix E.3

Notice posted on ORCAA website

Air Quality Burning Asbestos/Demo For Business Public Resources About Search Q

[Home](#) > [News & Notices](#)

Washington Dept. of Ecology opens public comment period on proposed SIP revision

February 8, 2024 Share: [f](#) [t](#) [e](#) [m](#)

Ecology is proposing to submit to the Environmental Protection Agency (EPA) a revision to Washington's Air Quality State Implementation Plan (SIP) to include updates to the Olympic Region Clean Air Agency (ORCAA) air quality rules. To ensure ORCAA's rules are federally enforceable, the federal Clean Air Act requires they be submitted as SIP revisions to EPA. Ecology is the delegated agency for submitting revisions to the Washington SIP.

Ecology invites the public to provide comments on whether we should submit the proposed SIP revision to EPA.

- View the proposed SIP revision (public review draft) at our [Infrastructure, rule and program plans webpage](#).

Public comment period

- February 8 to March 17, 2024

Online public hearing

- March 12, 2024, at 10:00 a.m.
- [Register for the public hearing](#)

To submit or view comments:

- [Comment online](#)
- Mail to: Linda KilloahL, Department of Ecology, P.O. Box 47600, Olympia, WA 98504-7600
- Testify at the public hearing on March 12, 2024

Background

ORCAA's Board of Directors adopted the rule updates on January 11, 2023, and they took effect on March 6, 2023. The rule updates removed the prohibition on recreational fires (e.g. small campfires) in the cities of Olympia, Lacey, and Tumwater in Thurston County, Washington. No other areas in ORCAA's jurisdiction were affected. The prohibition on recreational fires had been in effect in the cities of Olympia, Lacey, and Tumwater since March 2011. ORCAA has since determined that the recreational fire prohibition is no longer needed to attain or maintain national ambient air quality standards for coarse particulates (larger particles or PM10) in these areas. The removal of this prohibition makes the rules on recreational fires for these cities consistent with all other cities in ORCAA's jurisdiction. No new rules, requirements, or changes to existing state or local rules are being proposed.

News

[See all articles](#)

May 21, 2024
Thurston County helps residents prepare for wildfire season

May 14, 2024
New Notice of Construction (NOC) permit applications– May 14, 2024

May 14, 2024
Final Determination issued for Pacific Northwest Renewable Energy Permit Application

Media Contact

Dan Nelson
Communications/Outreach Manager
360-539-7610

Appendix E.4

Legal notice and affidavit of publication



The Beaufort Gazette
The Belleville News-Democrat
Bellingham Herald
Centre Daily Times
Sun Herald
Idaho Statesman
Bradenton Herald
The Charlotte Observer
The State
Ledger-Enquirer

Durham | The Herald-Sun
Fort Worth Star-Telegram
The Fresno Bee
The Island Packet
The Kansas City Star
Lexington Herald-Leader
The Telegraph - Macon
Merced Sun-Star
Miami Herald
El Nuevo Herald

The Modesto Bee
The Sun News - Myrtle Beach
Raleigh News & Observer
Rock Hill | The Herald
The Sacramento Bee
San Luis Obispo Tribune
Tacoma | The News Tribune
Tri-City Herald
The Wichita Eagle
The Olympian

AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Amount	Cols	Depth
27549	517456	Print Legal Ad-IPL01583910 - IPL0158391		\$206.10	1	44 L

Attention: Ian Fawley
WASHINGTON STATE DEPARTMENT OF ECOLOGY
913 SQUALICUM WAY, UNIT 101
BELLINGHAM, WA 98225

**State of Washington
Notice of Opportunity to Comment**

Ecology proposes to submit to the Environmental Protection Agency (EPA) revised rules of the Olympic Clean Air Agency (ORCAA) to include in Washington's State Implementation Plan (SIP). ORCAA's Board of Directors adopted the rule amendments on January 11, 2023, and they took effect on March 6, 2023. No new rules, requirements, or changes to existing state or local rules are being proposed with this action.

You may review and comment on the proposed SIP revision from February 8 through March 17, 2024. Ecology will hold an online public hearing on at 10:00 a.m. on March 12, 2024.

To review or comment on the SIP or to register for the public hearing, see: <https://ecology.wa.gov/regulations-permits/plans-policies/state-implementation-plans/infrastructure-sips>

To submit a comment:
Comment online: <https://aq.ecology.wa.gov/commentinput.com?id=2m4H9CG-pDMail> to: Linda Kildahl, Department of Ecology, PO Box 47600, Olympia, WA 98504-7600. Testify at the public hearing on March 12, 2024.

To request ADA accommodation, contact Ecology's ADA Coordinator by email at ecyada@ecology.wa.gov or call 360-407-6831, 711 (relay service), or 877-6341 (TTY).
IPL0158391
Feb 8 2024

Stefani Beard, being duly sworn, deposes and says: That she is the Principal Clerk of The Olympian, a daily newspaper printed and published at Olympia, Thurston County, State of Washington, and having a general circulation therein, and which said newspaper has been continuously and uninterruptedly published in said County during a period of six months prior to the first publication of the notice, a copy of which is attached hereto: that said notice was published in The Olympian in accordance with RCW 65.16.020 and RCW 63.16.040, as amended, for:

1 insertion(s) published on:
02/08/24

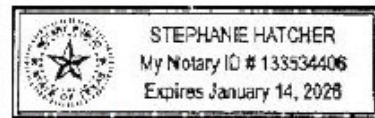
Stefani Beard

Principal Clerk

Sworn to and subscribed before me this 13th day of February in the year of 2024 before me, a Notary Public, personally appeared before me Stefani Beard known or identified to me to be the person whose name subscribed to the within instrument, and being by first duly sworn, declared that the statements therein are true, and acknowledged to me that he/she executed the same.

Stephanie Hatcher

Notary Public in and for the state of Texas, residing in Dallas County



Extra charge for lost or duplicate affidavits.
Legal document please do not destroy!

Appendix F

Public comments received and response to comments (Ecology)

Public Comments Received on Draft SIP and Ecology's Response

Public comment (received February 8, 2024)

I am commenting with regard to recreational fires (in this case: Thurston County) I wish to remind the regulators/law makers that WOOD SMOKE IS 12 TIMES MORE TOXIC THAN A CIGARETTE. (Not double: twelve 12 TIMES!) Wood smoke is a tiny particulate (as you likely know) that can lodge deep in the lungs and in a worst case scenario remain there. Additionally: the smoke from "others" fires intrudes into the breathing air of innocent people trying to be healthy. Due to the particulate size it is a fact that wood smokes goes into homes even with all the windows and doors closed. Given it is a known carcinogenic, and literally 'impossible' to avoid someone has a "recreational" fire...I feel it is negligent to the planet; to our breathing air; and it is toxic. As with cigarettes: I hope for a day when enough people are educated and MOTIVATED to take our BREATHING AIR seriously and NOT allow a small minority to pollute others air and to harm their health. Please persist in REDUCING wood smoke (fireplaces, wood burning stoves, AND "recreational" fires. It is insane to find those fine 'recreational' In fact: they are toxic pollution that harms and sometimes kills people. That's reality and factual. Please STOP INNOCENT PEOPLE FROM HAVING TO BREATHE THE SMOKE OF OTHERS.

Ecology response

Thank you for your comment. Ecology appreciates your concern for the health impacts of recreational fires and the time taken to express it. The update to the Olympic Region Clean Air Agency (ORCAA) air quality rule to remove the recreational fire prohibition took place in January 2023. Ecology is seeking public comments on whether to submit the updated ORCAA rule to EPA to include in the Washington State Implementation Plan (SIP). ORCAA conducted a public process during their rule update, and documentation, including ORCAA responses to comments received, is included in Appendix B of the SIP. An excerpt pertaining to a similar comment received by ORCAA during their public comment period is shown below.

ORCAA worked with EPA prior to adopting the 2023 rule change. A copy of ORCAA's technical analysis in support of removing the recreational fire prohibition and EPA's response that such a change would not interfere with any applicable requirement of the federal Clean Air, is included in Appendix C of the SIP.

ORCAA summary of similar comments received during the 2023 rule change

Air quality is bad locally. Commenters expressed concern that allowing recreational fires will cause localized impacts and unhealthful conditions.

ORCAA response to similar comments received during the 2023 rule change

The US Environmental Protection Agency (EPA) requirements for ambient monitoring recognize the monitor located in the City of Lacey as being indicative of air quality in Thurston County. That monitor has shown compliance with all national ambient air quality standards (including the particulate matter standards of PM10 and PM2.5) for more than two decades. ORCAA's nuisance smoke regulations will continue to be enforced to protect local air quality.

Public Comments Received on Draft SIP and Ecology's Response

Additionally, the growing use of personal air monitoring devices, such as the Purple Air sensor, allows ORCAA staff to 'crowd-source' local air quality monitoring to isolate potential problem areas. If problem areas are identified, ORCAA's compliance and education teams can focus on those areas for targeted responses.

Under Rule 6.2.7, recreational fires must be small (maximum of 3 feet diameter and 2 feet high) and must use dry, seasoned firewood or charcoal. Burning yard waste such as leaves, clippings, prunings, and other yard and gardening debris continues to be prohibited in cities and their urban growth area (UGA) boundaries under Rule 6.2.3. Furthermore, under ORCAA Rule 6.2.5(g), burning, recreational fires is unlawful if it is detrimental to the health, safety, or welfare of any person; if it causes damage to property or business; or if it causes a nuisance. In short, there is no change to ORCAA's nuisance smoke rule 6.2.5(g), which is the rule that has been enforced and allows ORCAA to focus on problem fires, no matter the kind or location.

Appendix G

SIP adoption order (Ecology)

In the matter of adopting a **State Implementation Plan (SIP) Revision to include revised Olympic Region Clean Air Agency Regulations** in the Washington State Implementation Plan.

SIP ADOPTION ORDER

In this SIP Revision, the Olympic Region Clean Air Agency (ORCAA) requests that the Washington State Department of Ecology (Ecology) submit to the United States Environmental Protection Agency (EPA) an amendment to ORCAA air quality regulations, Rule 6.2.7 for inclusion in the Washington SIP. EPA approval of this SIP Revision will make ORCAA's revised Rule 6.2.7 federally enforceable along with other SIP-approved portions of ORCAA air quality regulations.

Ecology took the following actions to satisfy state and federal procedural requirements for public involvement for a SIP Revision:

- Announced a public comment period (February 8 through March 17, 2024) and a public hearing date (March 12, 2024) on Ecology's "Infrastructure, rule, and program plans" and "Public input and events" webpages, as well as in emails to subscribers of Ecology's "Air Quality Rule and SIP Updates" distribution list.
- Posted a legal notice in "The Olympian" on February 8, 2024.
- Held a public hearing on March 12, 2024. No members of the public attended the online hearing.

IT IS HEREBY ORDERED that the referenced documents, constituting the revision, are approved and adopted by the Department of Ecology as part of the Washington State Implementation Plan. All provisions of the Washington State Implementation Plan inconsistent with the attached documents are superseded.

Laura Watson

Laura Watson, Director
Department of Ecology

8/5/2024

Date