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May 8, 2019

Maia Bellon, Director
Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Northwest Clean Air Agency Request for State Implementation Plan Revision

Dear Ms. Bellon:

Northwest Clean Air Agency (NWCAA) hereby requests that Washington State Department of Ecology (Ecology) submit the attached revision to the Washington State Implementation Plan (SIP) to EPA for approval. This revision affects the air quality regulations in the Washington SIP as they apply to NWCAA's jurisdiction in Island, Whatcom, and Skagit counties. The proposed changes to the NWCAA portion of the SIP are necessary to update the SIP-approved rules to better match the current NWCAA Regulation and to remove the regulation sections inappropriately included in the SIP.

As per Section 2.1 of Appendix V to 40 CFR Part 51, NWCAA is providing the following information for inclusion in the SIP revision package:

- Proposed SIP Action by Section Table – NWCAA Regulation: We compiled a table that lists how we propose to change certain sections of the NWCAA portion of the SIP. Note that the language in these sections concerning air toxics and odors will be excluded from the SIP.

As can be seen in the table, we propose to remove from the SIP several sections relating to enforcement and other general authority that were inadvertently included in the SIP during previous SIP submittals. EPA does review and approve local clean air agency submissions to ensure they provide adequate enforcement authority and other general authority to implement and enforce the SIP. However, regulations describing such agency enforcement and other general authority are generally not explicitly incorporated by reference in the SIP to avoid potential conflict with EPA's independent authorities.

- Proposed SIP Action by Section Table – Washington Administrative Code (WAC): The NWCAA portion of the SIP also includes references to sections of the WAC. We have enclosed a table listing the changes we are proposing to the references to the sections of the WAC in the SIP. Certain portions of the WAC are retained since NWCAA is relying upon the WAC for new source review requirements in nonattainment areas and also the Prevention of Significant Deterioration (PSD) program.
- EPA Preliminary Review Letter with Attachments: Also enclosed is the letter and associated attachments from EPA's preliminary review to determine the suitability of NWCAA's package for inclusion in the SIP. The attachments to this letter include a comparison of the proposed language against the current NWCAA SIP and a stringency evaluation.

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- CR-103p Submitted on April 11, 2019 for Rule Making: On April 11, 2019, the NWCAA Board of Directors adopted changes to the NWCAA Regulation. Please find enclosed the CR-103p Rule-Making Order form accepted by the Office of the Code Reviser associated with that rule making that included certain sections of this SIP submittal package.

If any additional information is needed, or you have questions about this request, please feel free to contact Lyn Tober in our office at lynt@nwcleanairwa.gov or (360) 419-6765.

Sincerely,



Mark Buford
Executive Director

Enclosures: Proposed SIP Action by Section Table - NWCAA Regulation & WAC
EPA preliminary review letter with attachments
CR-103p submitted on April 11, 2019 for rule making