

## Appendix F. Copies of Public Notices

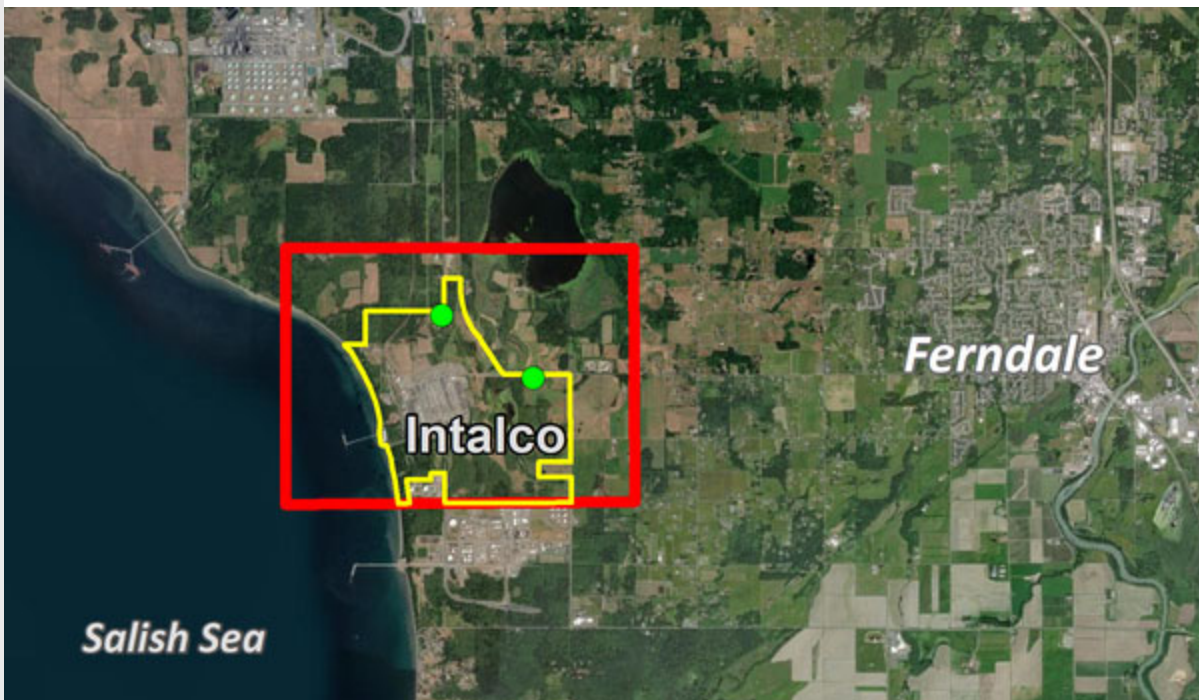
Appendix F includes copies of the public notices, email notifications, and public outreach materials regarding the proposed SIP revision and opportunity to participate in the public review process. The following copies of the documents are included:

1. GovDelivery email notice and distribution confirmation
2. Local newspaper notice - Affidavit of publication in Ferndale Record
3. Ecology's webpages about the project and public comment
4. NWCAA's webpages about the project and public comment
5. Email notices to:
  - Natural Resources Executive Director Jefferson, Lummi Indian Nation
  - Natural and Cultural Resources Director Currence, Nooksack Indian Tribe
  - Natural Resources Director Woodard, Samish Indian Nation
  - Environmental Policy Director Trainer, Swinomish Indian Tribal Community
  - Cultural and Natural Resources Executive Director Fryberg, The Tulalip Tribes
  - Natural and Cultural Policy Director Schuyler, Upper Skagit Indian Nation
  - Director Lautenbach, Whatcom County Health Department
  - Superintendent Dominguez and Assistant Superintendent Deebach, Ferndale School District
  - Communications Officer Riley Sweeney, City of Ferndale
  - Aquatic Reserve Program Manager Roberta Davenport, Washington State Department of Natural Resources
  - Wildlife Area Manager Richard Kessler, Washington State Department of Fish & Wildlife
  - President Occhiogrosso, Bellingham Chamber of Commerce
  - Director Milton, Ferndale Chamber of Commerce
6. Presentation slides from the Public Hearing

## Caudill, Anya (ECY)

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**From:** Washington Department of Ecology <waecy@public.govdelivery.com>  
**Sent:** Wednesday, September 07, 2022 12:04 PM  
**To:** Caudill, Anya (ECY)  
**Subject:** Washington SIP and Agreed Order Notice: Intalco Sulfur Dioxide Attainment Plan



We invite you to comment on our plan to reduce sulfur dioxide (SO<sub>2</sub>) pollution around the Intalco aluminum smelter in Whatcom County.

## Public comment period

**Intalco SO<sub>2</sub> Attainment Plan and Agreed Order**

**State Implementation Plan (SIP) Revision**

The following documents are now available for public review through Oct. 15, 2022:

- [Draft attainment plan](#)
- [Draft order](#)

The proposed Plan describes actions the facility will have to take, including:

- Installing and operating new SO<sub>2</sub> controls
- Merging and increasing the height of stacks
- Limit facility-wide and unit-specific SO<sub>2</sub> emissions
- Different scenarios if the facility should restart before or after April 30, 2025

## Why is this important?

In December 2020, EPA designated a 4.5-square-mile area around the Intalco aluminum smelter in Whatcom County as being in nonattainment of, or not meeting, the national air quality standard for SO<sub>2</sub>. Breathing elevated levels of SO<sub>2</sub> can cause inflammation and tightening of airways and trigger asthma symptoms.

We developed this Plan to bring the area back into attainment. It is a federally required revision to the Washington State Implementation Plan (SIP). The SIP is a federal clean air tool EPA and the public may use for oversight and enforcement of certain state and local air quality rules and plans.

As part of the Plan, Ecology proposes Agreed Order # 21310 (AO). It includes limits and monitoring of the Intalco facility's SO<sub>2</sub> emissions and emission rates. Located at 4050 Mountain View Rd in Ferndale, the smelter is capable of producing about 307,000 tons of aluminum metal each year when operating. Intalco, Blue Wolf Capital Partners (a private equity firm interested in purchasing and reopening the facility), and the Northwest Clean Air Agency (NWCAA) have participated in the development of the proposed Plan and AO.

No air pollutants are expected to increase because of this action.

[Learn more](#)

## ADA accommodations

To request accommodations and services to support your participation in the document review and in the Oct. 11 online hearing, contact Ecology at (360) 407-6831 or [ecyadacoordinator@ecy.wa.gov](mailto:ecyadacoordinator@ecy.wa.gov). Persons with impaired hearing may call Washington Relay Service at 711. Persons with a speech disability may call TTY at 800-833-6384.

**Send us your comments by Oct. 15**

[Comment online](#)

[Submit or view comments](#)

## Comment by mail

Kelsey Holbrook  
Industrial Section  
P.O. Box 47600  
Olympia, WA 98504-7600

Mailed comments must be postmarked by Oct. 15, 2022.

## Comment at a hearing

**Date:** Tuesday, Oct. 11, 2022

**Time:** Starting at 6 p.m.

**Register in advance and attend online:** <https://ecology.wa.gov/Intalco-Attainment-Hearing>

**Join by phone:** 253-215-8782, Meeting ID: 845 0539 1098

Thank you for taking the time to provide us with you comments. Ecology will consider all comments and complete our review of the plan before making the final decision whether to submit this SIP revision to EPA for approval.

## Anya Caudill

*Environmental Planner 3*

✉ [anya.caudill@ecy.wa.gov](mailto:anya.caudill@ecy.wa.gov)

☎ 360-791-5466

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## Caudill, Anya (ECY)

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**From:** Washington Department of Ecology <waecy@public.govdelivery.com>  
**Sent:** Wednesday, September 07, 2022 4:03 PM  
**To:** Caudill, Anya (ECY)  
**Subject:** Bulletin Detail Report: Washington SIP and Agreed Order Notice: Intalco Sulfur Dioxide Attainment Plan

Having trouble viewing this email? [View this report in your account.](#)



Report Generated: 09/07/2022 04:02 PM PDT

This report automatically generates after a bulletin is sent. [View the Bulletin Detail Report online](#) to see the most recent performance metrics for this bulletin.

**Subject:** Washington SIP and Agreed Order Notice: Intalco Sulfur Dioxide Attainment Plan

**Sent:** 09/07/2022 12:02 PM PDT

**Sent By:** anya.caudill@ecy.wa.gov

**Sent To:** Subscribers of ECY-AQ-RULE-AND-SIP-UPDATES or SO2-ATTAINMENT

**786**  
 Recipients

✓ Email

X SMS

X Facebook

X Twitter

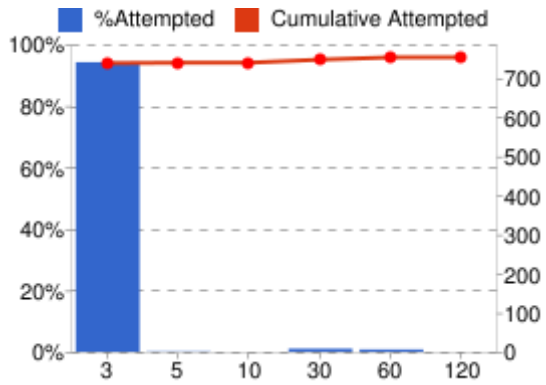
✓ RSS



**94.8%** **4%** Pending  
**1%** Bounced  
**25%** Open Rate  
**12%** Click Rate

Delivered A horizontal progress bar showing the percentage of delivered messages, corresponding to the 94.8% figure.

## Email Delivery Stats



Minutes	Cumulative Attempted
3	94%
5	94%
10	94%
30	95%
60	96%
120	96%

### Delivery Metrics - Details

**786** Total Sent

**745 (95%)** Delivered

**31 (4%)** Pending

**10 (1%)** Bounced

**0 (0%)** Unsubscribed

### Bulletin Analytics

**366** Total Opens

**187 (25%)** Unique Opens

**115** Total Clicks

**93 (12%)** Unique Clicks

**13** # of Links

## Delivery and Performance

Channel	Progress	Percent Delivered	Number of Recipients	Number Delivered	Opened / Unique	Bounced / Failed	Unsubscribed
Email Bulletin	Sending...	94.8%	786	745	187 / 25.1%	10	0
SMS Message	Delivered	0.0%	0	0	n/a	0	n/a

## Bulletin Link Overview

Link URL	Unique Clicks	Total Clicks
<a href="https://apps.ecology.wa.gov/publications/SummaryPages/2202035.html?utm_m...">https://apps.ecology.wa.gov/publications/SummaryPages/2202035.html?utm_m...</a>	15	26
<a href="https://fortress.wa.gov/ecy/ezshare/swm/industrial/Intalco-Agreed-Order-...">https://fortress.wa.gov/ecy/ezshare/swm/industrial/Intalco-Agreed-Order-...</a>	14	20
<a href="https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implemen...">https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implemen...</a>	11	16
<a href="https://aq.ecology.commentinput.com/?id=aKigu&amp;utm_medium=email&amp;utm_sourc...">https://aq.ecology.commentinput.com/?id=aKigu&amp;utm_medium=email&amp;utm_sourc...</a>	6	6
<a href="https://www.instagram.com/EcologyWA/?utm_medium=email&amp;utm_source=govdeli...">https://www.instagram.com/EcologyWA/?utm_medium=email&amp;utm_source=govdeli...</a>	6	6
<a href="https://ecology.wa.gov/Intalco-Attainment-Hearing?utm_medium=email&amp;utm_s...">https://ecology.wa.gov/Intalco-Attainment-Hearing?utm_medium=email&amp;utm_s...</a>	6	6
<a href="https://public.govdelivery.com/accounts/WAECY/subscriber/topics?qsp=ecology">https://public.govdelivery.com/accounts/WAECY/subscriber/topics?qsp=ecology</a>	5	5
<a href="https://twitter.com/ecologywa?utm_medium=email&amp;utm_source=govdelivery">https://twitter.com/ecologywa?utm_medium=email&amp;utm_source=govdelivery</a>	5	5

<a href="https://www.facebook.com/EcologyWA/?utm_medium=email&amp;utm_source=govdelivery">https://www.facebook.com/EcologyWA/?utm_medium=email&amp;utm_source=govdelivery</a>	5	5
<a href="https://ecology.wa.gov/?utm_medium=email&amp;utm_source=govdelivery">https://ecology.wa.gov/?utm_medium=email&amp;utm_source=govdelivery</a>	5	5
<a href="https://ecology.wa.gov/About-us/Accessibility-equity/Accessibility-ADA?u...">https://ecology.wa.gov/About-us/Accessibility-equity/Accessibility-ADA?u...</a>	5	5
<a href="https://www.youtube.com/EcologyWA?utm_medium=email&amp;utm_source=govdelivery">https://www.youtube.com/EcologyWA?utm_medium=email&amp;utm_source=govdelivery</a>	5	5
<a href="https://subscriberhelp.granicus.com/?utm_medium=email&amp;utm_source=govdeli...">https://subscriberhelp.granicus.com/?utm_medium=email&amp;utm_source=govdeli...</a>	5	5

Need more reports? [Additional reporting is available in your account.](#) If you want additional information on reporting, please visit the [reporting help menu](#).

Want to learn more about these metrics and the best practices for improving results? Contact your dedicated Client Success Consultant! Not sure who that is? Send us an email at [support@granicus.com](mailto:support@granicus.com) and we'll help you find out.



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# INVOICE

P.O. BOX 153 • LYNDEN, WA 98264 • PHONE 360-354-4444 • FAX 360-354-4445

DATE:  
9/7/2022

INVOICE #  
151695

TO:

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

P.O. NUMBER	TERMS	CLASS
	Net 30 Days	Lynden Tribune

DESCRIPTION	RATE	AMOUNT
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8.5 " Public Comment Period, Re: Intalco Aluminum LLC Sulfur Dioxide  
Air Quality Actions

22.50

191.25

'22 SEP 19 08:21  
DEPT OF ECOLOGY  
FISCAL & BUDGET

**Total**

\$191.25

**Payments/Credits**

\$0.00

**Balance Due**

\$191.25



# Ferndale Record

SERVING FERNDAL, BLAINE, CUSTER AND BIRCH BAY, WASHINGTON SINCE 1885

## AFFIDAVIT OF PUBLICATION

### PUBLIC COMMENT PERIOD INTALCO ALUMINUM LLC SULFUR DIOXIDE AIR QUALITY ACTIONS

The Department of Ecology invites you comment on the proposed attainment plan and associated Agreed Order that require Intalco to install sulfur dioxide (SO<sub>2</sub>) air pollution controls. The comment period runs Sept. 7 - Oct. 15, 2022.

Read the proposed documents at the following locations: Department of Ecology, 300 Desmond Drive SE, Lacey, WA, 360-407-6916; Ferndale Public Library, 2125 Main Street, Ferndale, WA; online at [ecology.wa.gov/Intalco](http://ecology.wa.gov/Intalco).

The EPA has designated a non-attainment area around the Intalco smelter as not meeting the national ambient air quality standard for SO<sub>2</sub> pollution. We are accepting comments on the plan and associated Agreed Order that requires the facility to install and operate new SO<sub>2</sub> controls, merge and increase the height of stacks, and limit facility-wide and unit-specific SO<sub>2</sub> emissions. We will submit these to EPA as a revision to the State Implementation Plan.

No air pollutants are expected to increase because of this action.

Written comments may be submitted online at <https://aq.ecology.commentinput.com/?id=aKigu> or by mail Kelsey Holbrook, Department of Ecology, Industrial Section, P.O. Box 47600, Olympia, WA 98504-7600.

An online public hearing to present information and accept oral comments will take place on Oct. 11, 2022, at <https://ecology.wa.gov/Intalco-Attainment-Hearing>, starting at 6 p.m.

When the comment period ends, we will review all comments received and make appropriate changes before making a final decision. The facility is located at 4050 Mountain View Road in Ferndale. While temporarily closed, the smelter is capable of producing about 307,000 tons of aluminum metal each year.

To request ADA accommodation including printed materials in a format for the visually impaired, contact Ecology at 360-280-4325 or [ecyadacoordinator@ecy.wa.gov](mailto:ecyadacoordinator@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.

Published September 7, 2022

STATE OF WASHINGTON,  
COUNTY OF WHATCOM

Michael Lewis being first sworn on oath, deposes and says that she is the principal clerk of the FERNDAL RECORD, a weekly newspaper. That said newspaper is a legal newspaper and has been approved as a legal newspaper by order of the superior court in the county in which it is published and it is now and has been for more than six months prior to the date of publications hereinafter referred to, published in the English language continually as a weekly newspaper in Whatcom County, Washington, and it is now, and during all of said time was, printed in an office maintained at the aforesaid place of publication of said newspaper.

That the annexed is a true copy of a Public Comment Period Intalco Aluminum LLC Sulfur Dioxide Air Quality Actions as it was published in regular issues (and not in supplement form)

of said newspaper once each week for a period of 1 consecutive weeks, commencing on the

7 day of September 2022, and ending on the

       day of        20  , both dates inclusive, and that such newspaper was regularly distributed to its subscribers during all of said period. That the full amount of the fee charged for the

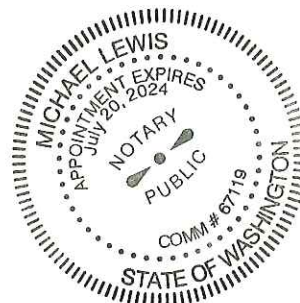
foregoing publication is the sum of \$ 141.25 which amount has been paid in full.

Subscribed and sworn to before me this 7 day of

September 2022

Michael Lewis

Notary Public in and for the State of Washington,  
residing in Lynden.



Mailing: P.O. Box 153 • Lynden, WA 98264 • (360) 354-4444

# Alcoa Intalco

We regulate the air, water, hazardous waste, and cleanup activities at the Alcoa Intalco aluminum smelter in Ferndale.

## Air quality

### Sulfur dioxide nonattainment

#### Regional haze

All areas in Washington state must meet national air quality standards for the six most common air pollutants. One of those pollutants is sulfur dioxide (SO<sub>2</sub>).

From 2017-2019, we worked with the Northwest Clean Air Agency to evaluate air quality data from Whatcom County. [Data from monitors near Intalco](#) showed SO<sub>2</sub> did not meet the national standard.

In Dec. 2020, the U.S. Environmental Protection Agency (EPA) designated part of Whatcom County near the smelter to be in nonattainment for this standard. ([EPA's decision](#) and [response to comments](#)).

### Proposed attainment plan

The comment period on the proposed plan to bring the area back into attainment ended Oct. 15, 2022.

[Draft attainment plan](#) (called a State Implementation Plan revision)

[Draft Agreed Order](#)

[Read comments received](#)

The proposed plan describes actions the facility will have to take, including:

- Installing and operating new SO<sub>2</sub> controls

- Merging and increasing the height of stacks

- Limit facility-wide and unit-specific SO<sub>2</sub> emissions

- Different scenarios if the facility should restart before or after April 30, 2025

The Northwest Clean Air Agency, Intalco, and Blue Wolf Capital Partners (a private equity firm interested in purchasing and reopening the facility) participated in the development of the proposed plan.

### Next steps

EPA's oversight of the plan is required under the federal Clean Air Act. When the comment period ends, we will review comments received and make appropriate changes before submitting it to EPA. Once approved by EPA, the requirements of the attainment plan and Agreed Order become federally-enforceable.

### Why this is important

Breathing elevated levels of SO<sub>2</sub> causes inflammation and tightening of airways, and can trigger asthma symptoms. SO<sub>2</sub> typically dissipates very quickly, but people living or working close to sources may be exposed to short-term levels that pose a risk to those with pre-existing breathing or health issues. SO<sub>2</sub> pollution also decreases visibility in the form of haze and contributes to acid rain.

Join our [sulfur dioxide attainment email list](#) to learn more about our efforts to monitor and evaluate SO<sub>2</sub> levels in Washington.

Updated Oct. 17, 2022

## Facility information

This facility is temporarily shut down. When running, it turns alumina ore into aluminum metal. Recycling aluminum does not take place at this location.

At full production, Intalco is capable of making approximately 307,000 tons of aluminum metal each year.

Wastewater is sent to the Strait of Georgia. Though the smelter is currently closed, Intalco continues to monitor pollutants in its treated sanitary wastewater and stormwater.

## Permit information

[Air Operating Permit](#) 

Because of the size of this permit's support document, which explains the permit, it is available by request. Contact Angelina Ward at [angelina.ward@ecy.wa.gov](mailto:angelina.ward@ecy.wa.gov) or 360-407-6916.

[Wastewater permit](#) 

[Support document](#) 

[Support document for 2016 update to the permit](#) 

## Intalco contacts

[Company website](#) 

Facility phone: 360-384-6061

Location: 4050 Mountain View Road, Ferndale

## Related links

[Cleanup activities at the Intalco site](#) 

[Industrial Section permits](#) 

## Contact information

**Kelsey Holbrook**

Environmental Engineer

Air quality actions

[kelsey.holbrook@ecy.wa.gov](mailto:kelsey.holbrook@ecy.wa.gov)

360-280-2668

**Greg Gould**

Environmental Engineer

Water quality, hazardous waste, and cleanup actions

[greg.gould@ecy.wa.gov](mailto:greg.gould@ecy.wa.gov)

360-819-6426

# Attainment State Implementation Plans



## Comment on the Intalco attainment plan and agreed order

Comment on Washington's plan to bring the nonattainment area (area not meeting the national air quality standard for sulfur dioxide) around the Alcoa Intalco aluminum smelter into attainment (meeting the national air quality standard for sulfur dioxide).

All areas in Washington must meet national air quality standards for the six most common air pollutants. One of those pollutants is sulfur dioxide (SO<sub>2</sub>).

A small area around the Alcoa Intalco aluminum smelter did not meet the national air quality standard for sulfur dioxide. EPA designated it as a nonattainment area in December 2020. Washington must submit a plan to EPA to bring this area into attainment if Intalco restarts operating.

The plan describes how Intalco will:

- Reduce sulfur dioxide air pollution (emissions) to meet national air quality standards by April 30, 2026.

- Install and operate new sulfur dioxide controls.

- Merge and increase the height of stacks.

- Limit sulfur dioxide emissions.

- Continue to meet the sulfur dioxide air quality standard after it is met.

### Documents for review:

- [Draft SIP Revision: Alcoa Intalco aluminum smelter attainment plan](#)

- [Alcoa Intalco draft agreed order](#)

**Public comment period:** Sept. 7, 2022 – Oct. 15, 2022

**Public hearing:** Oct. 11, 2022, 6 p.m. [online](#)

Register to get your meeting ID and passcode.

To hear the webinar better or to call in only, use your phone (instead of the computer) to call 253-215-8782 (meeting ID 845 0539 1098).

[Comment online](#)

Mail comments to:

Kelsey Holbrook

Washington State Department of Ecology

Industrial Section

P.O. Box 47600; Olympia, WA 98504-7600

After the public comment period ends, we will submit the plan to EPA for approval in the overarching air quality State Implementation Plan (SIP).

When an area doesn't meet national air quality standards, we work with local clean air agencies and affected communities to develop Attainment State Implementation Plans.

## I want to...



Find areas of concern



See the status of Washington's attainment and maintenance areas



Sign up for email updates about current SIP projects

## What is an Attainment State Implementation Plan?

If air quality does not meet a standard, EPA may classify the affected area as nonattainment, meaning the area does **not** meet national air quality standards. A state implementation plan (SIP) outlines actions to improve air quality.

The federal Clean Air Act requires an Attainment State Implementation Plan be developed for an area that does not meet [national air quality standards](#). The plan describes how an area will be brought back into compliance with federal standards within a specific time frame.

## An Attainment State Implementation Plan includes:

A current, comprehensive inventory of emissions

Enforceable measures to reduce emissions; these measures may include a combination of state, local, and federal rules, plans, administrative orders, and permits for specific sources

A demonstration that the measures in place will bring the area back into attainment within a specific deadline

Contingency measures that will be implemented if the area does not meet the standard by the deadline

## Process to develop plans

We must submit complete attainment plans to EPA for approval. If we don't meet deadlines, EPA can issue sanctions or implement a federal plan for Washington.

When we develop a [State Implementation Plan](#), we follow a process:

We hold a public comment period on an attainment state implementation plan.

We send the plan to EPA for approval.

EPA holds another public comment period.

EPA approves the attainment plan which then becomes enforceable.

When an area is back in compliance, we ask EPA to re-classify the area as in attainment or maintenance.

Once an area meets air quality standards, we have additional requirements to make sure the area will continue meeting air quality standards. We work with [local clean air agencies](#) and affected communities to develop two 10-year maintenance state implementation plans to stay in compliance.

### Related links

[EPA's list of Washington attainment and maintenance SIPs](#) 

[Washington's air quality targets](#)

[Air quality standards](#)

[Business and industry requirements for air quality](#)

### Contact information

**Anya Caudill**

Environmental Planner

[anya.caudill@ecy.wa.gov](mailto:anya.caudill@ecy.wa.gov)

360-791-5499



# SULFUR DIOXIDE (SO<sub>2</sub>) EMISSIONS AT INTALCO

The Northwest Clean Air Agency is working with the [Washington Department of Ecology \(https://ecology.wa.gov/\)](https://ecology.wa.gov/), the [U.S. Environmental Protection Agency \(https://www.epa.gov/\)](https://www.epa.gov/)'s Region 10 based in Seattle, and various stakeholders to bring sulfur dioxide (SO<sub>2</sub>) emissions from Alcoa's Intalco aluminum smelter in Whatcom County in line with national air quality standards.

On Dec. 21, 2020, EPA designated a small portion of Whatcom County that includes the Intalco smelter as being in nonattainment of the federal standard.

**UPDATE (Sept. 7, 2022):** All areas in Washington state must meet national air quality standards for the six most common air pollutants. One of those pollutants is sulfur dioxide (SO<sub>2</sub>).

- From 2017-2019, the Washington Department of Ecology and the Northwest Clean Air Agency worked together to evaluate air quality data from Whatcom County. [Data from monitors near Intalco \(https://fortress.wa.gov/ecy/publications/SummaryPages/2002015.html\)](https://fortress.wa.gov/ecy/publications/SummaryPages/2002015.html) showed SO<sub>2</sub> did not meet the national standard.
- In December 2020, the U.S. Environmental Protection Agency (EPA) designated part of Whatcom County near the smelter to be in nonattainment for this standard. ([EPA's decision \(https://www.epa.gov/sites/production/files/2020-12/documents/round\\_4\\_final\\_so2\\_designations\\_summary\\_table.pdf\)](https://www.epa.gov/sites/production/files/2020-12/documents/round_4_final_so2_designations_summary_table.pdf) and [response to comments \(https://www.epa.gov/sites/production/files/2020-12/documents/rd4\\_so2\\_designations\\_responses\\_to\\_comments\\_final\\_v2.pdf\)](https://www.epa.gov/sites/production/files/2020-12/documents/rd4_so2_designations_responses_to_comments_final_v2.pdf).)

## Comment period: Sept. 7 – Oct. 15, 2022

The Department of Ecology invites you to comment on the proposed plan to bring the area back into attainment.

- [Draft attainment plan \(https://apps.ecology.wa.gov/publications/SummaryPages/2202035.html\)](https://apps.ecology.wa.gov/publications/SummaryPages/2202035.html) (called a State Implementation Plan revision)
- [Draft Agreed Order \(https://fortress.wa.gov/ecy/ezshare/swm/industrial/Intalco-Agreed-Order-21310.pdf\)](https://fortress.wa.gov/ecy/ezshare/swm/industrial/Intalco-Agreed-Order-21310.pdf)

The proposed plan describes actions the facility will have to take, including:

- Installing and operating new SO<sub>2</sub> controls
- Merging and increasing the height of stacks
- Limit facility-wide and unit-specific SO<sub>2</sub> emissions
- Different scenarios if the facility should restart before or after April 30, 2025

The Northwest Clean Air Agency, Intalco, and Blue Wolf Capital Partners (a private equity firm interested in purchasing and reopening the facility) have participated in the development of the proposed plan.

## Submit comments

- Using the [online comment form \(https://aq.ecology.commentinput.com/?id=aKigu\)](https://aq.ecology.commentinput.com/?id=aKigu)
- By mail to Kelsey Holbrook, Department of Ecology, Industrial Section, P.O. Box 47600, Olympia, WA 98504-7600
- Orally at an online hearing, Oct. 11, 2022, starting at 6 p.m., [register and attend \(https://waecy-wa-gov.zoom.us/meeting/register/tZAod-yrpzogE9zOkBc7ODXy-Va1eyCHuifX\)](https://waecy-wa-gov.zoom.us/meeting/register/tZAod-yrpzogE9zOkBc7ODXy-Va1eyCHuifX)

## Next steps

EPA's oversight of the plan is required under the federal Clean Air Act. When the comment period ends, Ecology will review comments received and make appropriate changes before submitting it to EPA. Once approved by EPA, the requirements of the attainment plan and Agreed Order become federally-enforceable.

## Why this is important

Breathing elevated levels of SO<sub>2</sub> causes inflammation and tightening of airways, and can trigger asthma symptoms. SO<sub>2</sub> typically dissipates very quickly, but people living or working close to sources may be exposed to short-term levels that pose a risk to those with pre-existing breathing or health issues. SO<sub>2</sub> pollution also decreases visibility in the form of haze and contributes to acid rain.

Join Ecology's [sulfur dioxide attainment email list \(https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic\\_id=WAECY\\_120\)](https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_120) to learn more about our efforts to monitor and evaluate SO<sub>2</sub> levels in Washington.

**UPDATE (early 2021):** In early 2021, the Intalco nonattainment area was put on hold because of the recent change in the Federal Administration. Specifically, a hold was placed, pending review, on recent activities that occurred in the 90-day period prior to the change in administrations. That hold has now been lifted and the nonattainment area work is

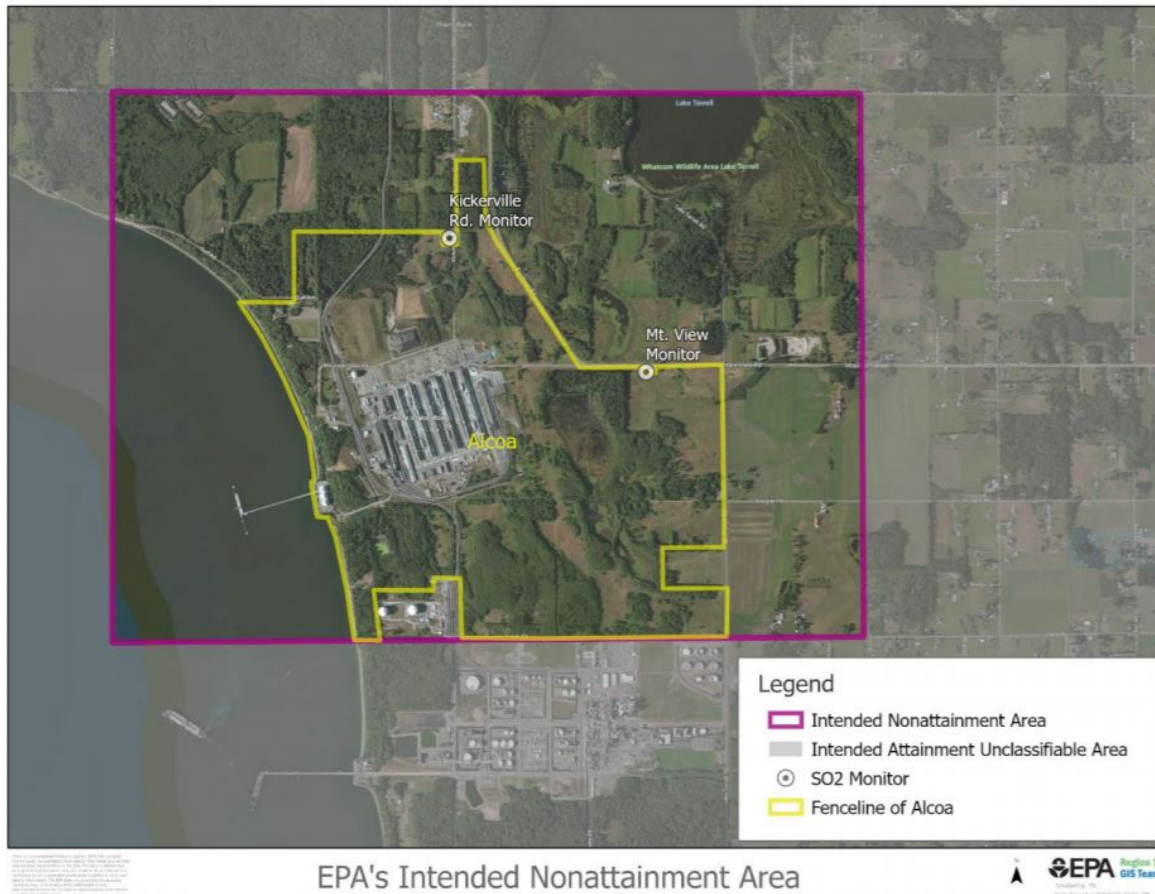
proceeding on its original schedule. Check [Ecology's Alcoa Intalco webpage](https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Industrial-facilities-permits/Intalco) (<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Industrial-facilities-permits/Intalco>) for more information.

**BACKGROUND:** Two air quality monitors near the Intalco smelter have, at times, shown SO<sub>2</sub> emissions above the National Ambient Air Quality Standard (NAAQS) of 75 parts per billion. Evidence suggests that the area where periodic exceedances occur is relatively small. But when this occurs a specified number of times within three consecutive years, EPA can designate the area as a nonattainment area, meaning it exceeds the federal standard.

Ecology and the Northwest Clean Air Agency prepared a technical report on their findings and submitted the report to EPA:

- [Analysis of Sulfur Dioxide Monitoring Data in Whatcom County: Air Quality Technical Report](https://fortress.wa.gov/ecy/publications/SummaryPages/2002015.html) (<https://fortress.wa.gov/ecy/publications/SummaryPages/2002015.html>)

On Aug. 21, 2020, EPA proposed a nonattainment area that includes the Intalco facility (<https://www.federalregister.gov/documents/2020/08/21/2020-18129/epa-responses-to-certain-state-designation-recommendations-for-the-2010-sulfur-dioxide-primary>). EPA held a public comment period that ended Sept. 21, 2020. EPA had to finalize the designation by Dec. 31, 2020.





*(Courtesy image.)*

The federal Clean Air Act requires that a nonattainment area include not only the area that is violating the federal pollution standard but also nearby areas that contribute to the violation.

Criteria that factor into determining the boundaries for the nonattainment area include air quality data, emissions information, population density, traffic and commuting patterns, expected growth, weather, topography, jurisdictional boundaries, and control of emissions.

Ecology's Industrial section has jurisdiction over the Intalco facility, including air emissions. But the proposed nonattainment area's boundary also includes the Petrogas West facility and some private properties.

Intalco and Ecology (in coordination with other parties, including NWCAA) are required to put together a plan to bring the area back into attainment within a designated time period.

See Ecology's web pages about [SO2 air quality designations](https://ecology.wa.gov/SO2designation) (<https://ecology.wa.gov/SO2designation>) and [SO2 in general](http://www.ecology.wa.gov/sulfurdioxide) (<http://www.ecology.wa.gov/sulfurdioxide>) for more information.

## About Sulfur Dioxide (SO2) and health

Excess SO2 emissions are a concern because they can impact human health and the environment.

Short-term exposures to SO2 can harm the human respiratory system and make breathing difficult. Children, the elderly, and those who suffer from asthma are particularly sensitive to the effects of SO2.

SO2 and other sulfur oxides can react with other compounds in the atmosphere to form small particles, which may penetrate deeply into sensitive parts of the lungs and cause additional health problems.

SO2 and other sulfur oxides also could contribute to acid rain and to visibility-reducing haze on public lands like national parks and wilderness areas.

If you have questions about possible health impacts, call Whatcom County Health at 360-778-6000.

 ([https://www.youtube.com/channel/UCNjXDPN178QEEZSYFVVL\\_Q/videos](https://www.youtube.com/channel/UCNjXDPN178QEEZSYFVVL_Q/videos))

[CONTACT US \(/CONTACT-US/\)](#)

[CAREERS \(/ABOUT-US/EMPLOYMENT/\)](#)

**From:** [Caudill, Anya \(ECY\)](#)  
**To:** [Director Jefferson](#)  
**Bcc:** [Angela Fritz \(ECY\) \(anfr461@ECY.WA.GOV\)](#)  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period  
**Date:** Wednesday, September 07, 2022 12:45:00 PM

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Dear Director Jefferson,

The Department of Ecology is accepting public comments on the draft [Intalco Sulfur Dioxide Attainment Plan](#) and associated air quality [Agreed Order #21310](#) for the curtailed Intalco aluminum smelter in Whatcom County. As described in these documents, Ecology is requiring the facility to install air pollution controls before restarting.

In 2021, the U.S. Environmental Protection Agency designated a small area around the Intalco facility as being in “nonattainment” for sulfur dioxide – a common form of air pollution produced as a by-product of the aluminum smelting process. EPA is the final decision maker on whether the draft Attainment Plan meets the requirements of the federal Clean Air Act. We are accepting comments until October 15, 2022, and would like to hear and consider any input you may have. For information on commenting, or to attend a hearing, visit <https://ecology.wa.gov/Events/SWM/Intalco-SO2-Attainment-Plan/Intalco-SO2-Attainment-Plan>. We plan to submit the plan to the EPA by the end of 2022.

You can read more about our work to reduce air pollution from this facility when it is operating on the [Ecology webpage](#). Please let me know if you have comments, questions, or would like to speak with us about potential impacts of this action.

Respectfully,

Anya Caudill (she/her), Environmental Planner 3  
Policy & Planning Section, Air Quality Program  
Call or text: 360-791-5499  
E-mail: [anya.caudill@ecy.wa.gov](mailto:anya.caudill@ecy.wa.gov)

This communication is a public record (Washington State Public Records Act, Ch. 42.56 RCW)

## Caudill, Anya (ECY)

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**From:** Caudill, Anya (ECY)  
**Sent:** Wednesday, September 07, 2022 2:04 PM  
**To:** george.swanasetjr@nooksack-nsn.gov  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period

Dear Director Swanaset,

The Department of Ecology is accepting public comments on the draft [Intalco Sulfur Dioxide Attainment Plan](#) and associated air quality [Agreed Order #21310](#) for the curtailed Intalco aluminum smelter in Whatcom County. As described in these documents, Ecology is requiring the facility to install air pollution controls before restarting.

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Respectfully,

Anya Caudill (she/her), Environmental Planner 3  
Policy & Planning Section, Air Quality Program  
Call or text: 360-791-5499  
E-mail: [anya.caudill@ecy.wa.gov](mailto:anya.caudill@ecy.wa.gov)

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## Caudill, Anya (ECY)

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**From:** Caudill, Anya (ECY)  
**Sent:** Wednesday, September 07, 2022 12:48 PM  
**To:** Director Woodard  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period

Dear Director Woodard,

The Department of Ecology is accepting public comments on the draft [Intalco Sulfur Dioxide Attainment Plan](#) and associated air quality [Agreed Order #21310](#) for the curtailed Intalco aluminum smelter in Whatcom County. As described in these documents, Ecology is requiring the facility to install air pollution controls before restarting.

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Policy & Planning Section, Air Quality Program  
Call or text: 360-791-5499  
E-mail: [anya.caudill@ecy.wa.gov](mailto:anya.caudill@ecy.wa.gov)

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## Caudill, Anya (ECY)

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**From:** Caudill, Anya (ECY)  
**Sent:** Wednesday, September 07, 2022 12:51 PM  
**To:** atrainer@swinomish.nsn.us  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period

Dear Director Trainer,

The Department of Ecology is accepting public comments on the draft [Intalco Sulfur Dioxide Attainment Plan](#) and associated air quality [Agreed Order #21310](#) for the curtailed Intalco aluminum smelter in Whatcom County. As described in these documents, Ecology is requiring the facility to install air pollution controls before restarting.

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## Caudill, Anya (ECY)

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**From:** Caudill, Anya (ECY)  
**Sent:** Wednesday, September 07, 2022 12:53 PM  
**To:** rayfryberg@tulaliptribes-nsn.gov  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period

Dear Director Fryberg,

The Department of Ecology is accepting public comments on the draft [Intalco Sulfur Dioxide Attainment Plan](#) and associated air quality [Agreed Order #21310](#) for the curtailed Intalco aluminum smelter in Whatcom County. As described in these documents, Ecology is requiring the facility to install air pollution controls before restarting.

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## Caudill, Anya (ECY)

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**From:** Caudill, Anya (ECY)  
**Sent:** Wednesday, September 07, 2022 12:52 PM  
**To:** sschuyler@upperskagit.com  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period

Dear Director Schuyler,

The Department of Ecology is accepting public comments on the draft [Intalco Sulfur Dioxide Attainment Plan](#) and associated air quality [Agreed Order #21310](#) for the curtailed Intalco aluminum smelter in Whatcom County. As described in these documents, Ecology is requiring the facility to install air pollution controls before restarting.

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## Caudill, Anya (ECY)

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**From:** Caudill, Anya (ECY)  
**Sent:** Wednesday, September 07, 2022 3:03 PM  
**To:** Lautenbach, Erika (DOHi)  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period

Dear Director Lautenbach,

The Department of Ecology is accepting public comments on the draft [Intalco Sulfur Dioxide Attainment Plan](#) and associated air quality [Agreed Order #21310](#) for the curtailed Intalco aluminum smelter in Whatcom County. As described in these documents, Ecology is requiring the facility to install air pollution controls before restarting.

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## Caudill, Anya (ECY)

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**From:** Caudill, Anya (ECY)  
**Sent:** Wednesday, September 07, 2022 3:09 PM  
**To:** Dr. Kristi Dominguez, Superintendent; Mark Deebach, Assistant Superintendent of Business Services  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period

Dear Superintendent Dominguez and Assistant Superintendent Deebach,

The Department of Ecology is accepting public comments on the draft [Intalco Sulfur Dioxide Attainment Plan](#) and associated air quality [Agreed Order #21310](#) for the curtailed Intalco aluminum smelter in Whatcom County. As described in these documents, Ecology is requiring the facility to install air pollution controls before restarting.

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## Caudill, Anya (ECY)

---

**From:** Caudill, Anya (ECY)  
**Sent:** Wednesday, September 07, 2022 3:13 PM  
**To:** Riley Sweeney, Communications Officer  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period

Dear Riley,

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## Caudill, Anya (ECY)

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**From:** Caudill, Anya (ECY)  
**Sent:** Wednesday, September 07, 2022 3:12 PM  
**To:** DAVENPORT, ROBERTA (DNR); Kessler, Richard B (DFW)  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period

Dear Roberta and Richard,

The Department of Ecology is accepting public comments on the draft [Intalco Sulfur Dioxide Attainment Plan](#) and associated air quality [Agreed Order #21310](#) for the curtailed Intalco aluminum smelter in Whatcom County. As described in these documents, Ecology is requiring the facility to install air pollution controls before restarting.

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## Caudill, Anya (ECY)

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**From:** Caudill, Anya (ECY)  
**Sent:** Wednesday, September 07, 2022 3:05 PM  
**To:** Guy Occhiogrosso, President/CEO, Bellingham Regional Chamber of Commerce  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period

Dear President Occhiogrosso,

The Department of Ecology is accepting public comments on the draft [Intalco Sulfur Dioxide Attainment Plan](#) and associated air quality [Agreed Order #21310](#) for the curtailed Intalco aluminum smelter in Whatcom County. As described in these documents, Ecology is requiring the facility to install air pollution controls before restarting.

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## Caudill, Anya (ECY)

---

**From:** Caudill, Anya (ECY)  
**Sent:** Wednesday, September 07, 2022 3:06 PM  
**To:** Anya Milton, Ferndale Chamber of Commerce Executive Director  
**Subject:** Intalco Aluminum Smelter Sulfur Dioxide Air Quality Plan - Comment Period

Dear Director Milton,

The Department of Ecology is accepting public comments on the draft [Intalco Sulfur Dioxide Attainment Plan](#) and associated air quality [Agreed Order #21310](#) for the curtailed Intalco aluminum smelter in Whatcom County. As described in these documents, Ecology is requiring the facility to install air pollution controls before restarting.

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# Intalco SO<sub>2</sub> Attainment Plan and Agreed Order # 21310



PUBLIC HEARING

October 11, 2022 at 6 pm

Hearing officer: Melanie Forster



# Meeting logistics – recording notice

- We will record the public hearing portion of the meeting tonight.
- Your screen name and chat conversations during the hearing will also be recorded.
- To change your name on the screen, go to the participants icon or right-click on your picture; click “more”; then select “rename.”
- If you have any technical problems, please use the “chat” feature to contact the meeting host - Eman Jabali.



# How to connect audio and ask for help

## Join

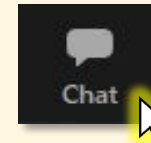
Connect Audio & Join



Tip

Try your computer  
audio *first*.

## Participate



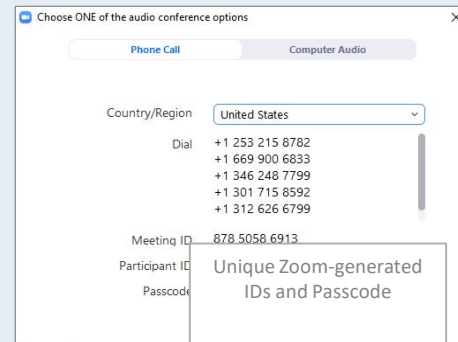
Question?  
Need help?  
Chat with us!

## Audio

**A** Best Option: Use computer for audio

**B** If selecting "Phone Call"...

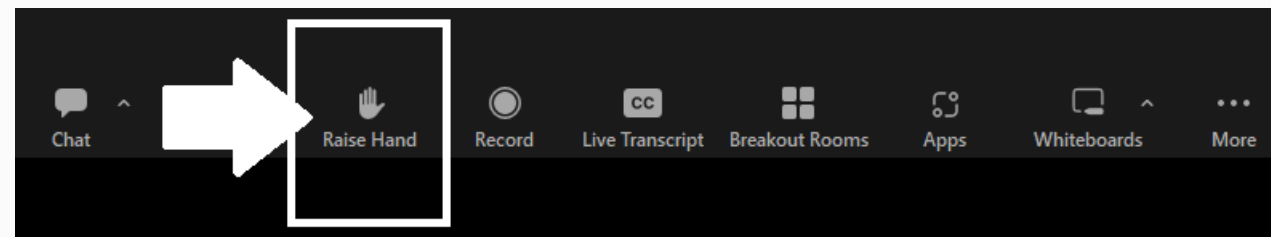
- Dial: **253-215-8782 (Tacoma)**
- Enter Meeting ID **845 0539 1098**, and
- Enter your unique Participant ID and #
- Or you will be prompted to enter the Passcode.



Turn on the Chat box  
and Participant list from  
your toolbar.

# Meeting logistics

- Participants using computer or mobile app:
  - Use the “Raise Your Hand” button. This button is located in the lower right hand corner of the participant list window.
- Participants listening in on the phone:
  - Press \*9 on your phone. The system will show you have your hand raised. The host will unmute you at your turn and the system will announce that you are unmuted.



# SO<sub>2</sub> team present at the hearing

- **Chris Hanlon-Meyer**, manager of Ecology's Science & Engineering Section
- **James DeMay**, manager of Ecology's Industrial Section
- **Agata McIntyre**, engineering manager, Northwest Clean Air Agency (NWCAA)
- **Seth Preston**, communications program manager, NWCAA
- **Phil Gent**, senior policy engineer, Ecology's Policy & Planning Section
- **Kelsey Brotherton**, permit engineer, Ecology's Industrial Section
- **Anya Caudill**, environmental planner, Ecology's Policy & Planning Section

# Agenda

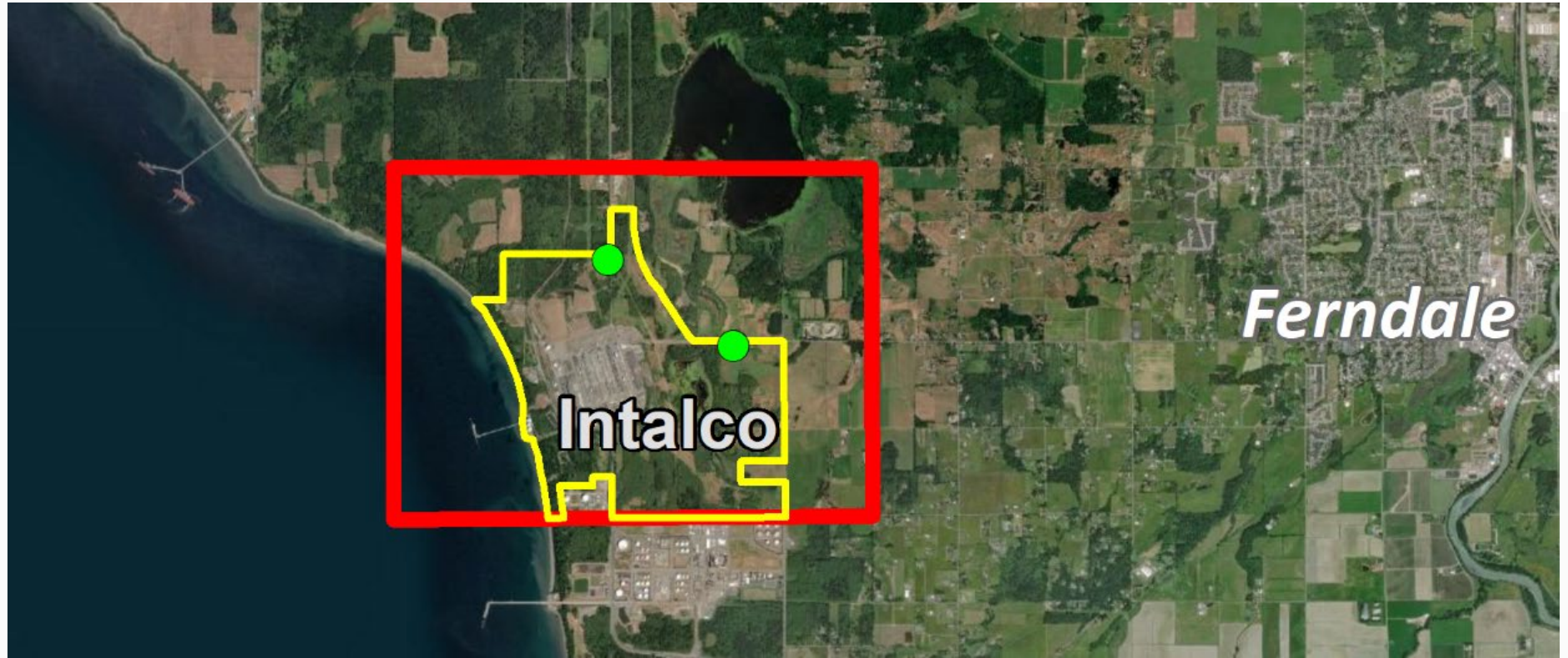
- 1 Public hearing ground rules
- 2 Intalco SO<sub>2</sub> Attainment Plan overview
  - Background
  - Intalco SO<sub>2</sub> attainment strategy
  - Agreed Order
  - Attainment demonstration
- 3 Questions & answers
- 4 Public Hearing (recorded)

# Ground rules

- Hearing officer makes sure:
  - Everyone who wants to is able to ask questions and provide testimony.
  - We have a clear recording.
- Wait until you are called on to ask a question or provide testimony.
- Please summarize lengthy comments – or repetitive ones.
- Written comments receive the same consideration:
  - Online: must be received by October 15, 2022 at 11:59 pm.
  - Postal mail: postmarked by October 15, 2022.



DEPARTMENT OF  
**ECOLOGY**  
State of Washington



## Intalco SO<sub>2</sub> Attainment Plan

Anya Caudill, SIP planner & Kelsey Brotherton, permit engineer

October 11, 2022

# SO<sub>2</sub> standard and data collection

- **2010** – New national ambient air quality standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>):
  - Health impacts from short-term exposure
    - Protective of vulnerable populations with an adequate margin of safety
  - Attainment is  $\leq 75$  parts per billion (ppb) of SO<sub>2</sub>
    - 3-year average of the annual 99<sup>th</sup> %-tile of hourly values
- **2015** – EPA's SO<sub>2</sub> Data Requirements Rule:
  - Areas around facilities emitting 2,000 tons of SO<sub>2</sub> a year must be characterized by either monitoring or modeling
    - Intalco aluminum smelter ~4,700 tons of SO<sub>2</sub> in 2014
    - Method for evaluation: monitoring for SO<sub>2</sub> levels during 2017-2019

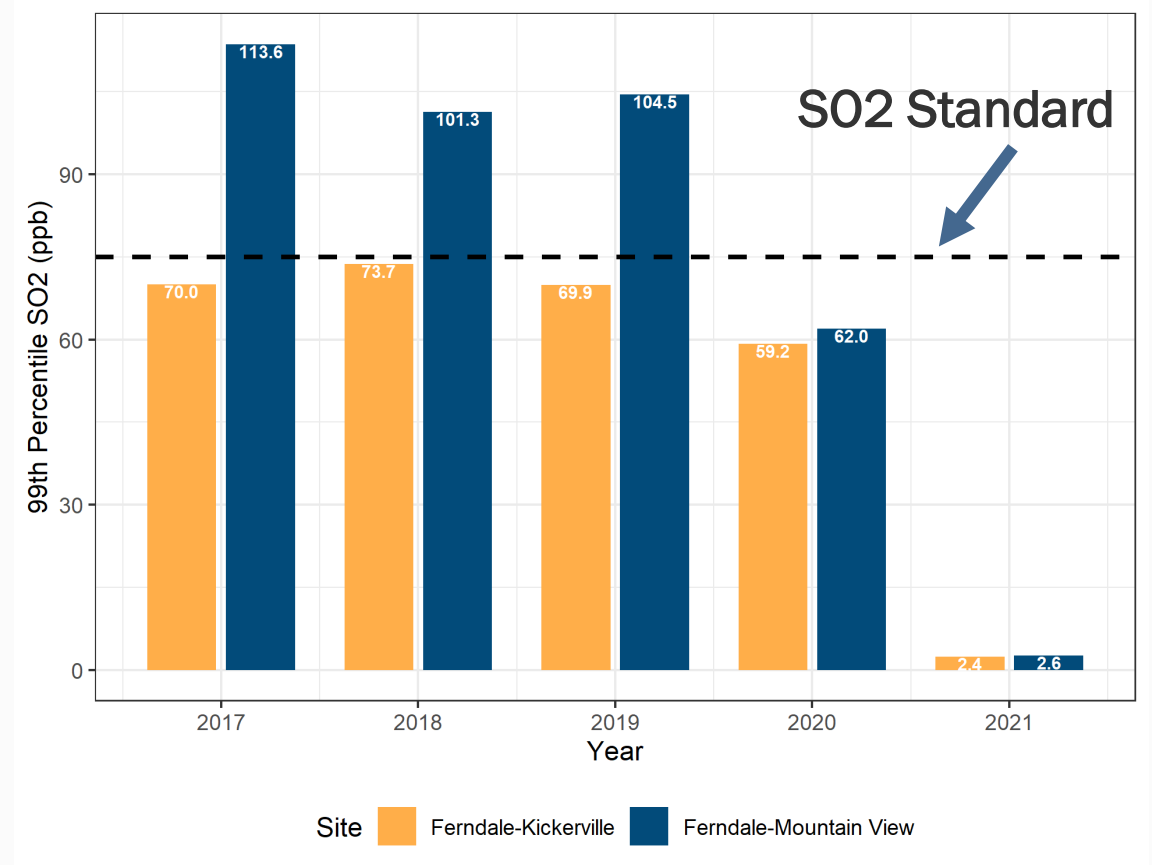
# Nonattainment designation, 2020

- 2017 -2019 monitoring: 106 ppb -> nonattainment
  - SO<sub>2</sub> emissions from the Intalco's operations
- The nonattainment area boundary includes:
  - the source contributing or causing the violation
  - all areas with elevated SO<sub>2</sub> levels
- Jurisdiction:
  - Ecology's Industrial Section regulates emissions from Intalco
  - Northwest Clean Air Agency



# 2020 curtailment

- Intalco is not currently operating or emitting SO<sub>2</sub>.
- Nonattainment designation was based on 2017-2019 data.
- A curtailed facility maintains its permits and can restart.
- Nonattainment designation is not changed by curtailment.
- Attainment plan is still required, with permanent controls.



# SIP revision for nonattainment area

- Attainment plan is a revision to the Washington State Implementation Plan (SIP) and must be submitted to EPA:
  - EPA is the final decision maker
  - Failure to submit or attain results in federal mandatory sanctions
- SIP is an additional layer of federal and public oversight and enforcement of certain state air quality rules and programs.
- An attainment plan must solve a specific air quality problem known to cause detrimental effects to human health.
- States can choose the most cost effective attainment control strategy.

# Our proposal

- Ecology is accepting comments on:
  - Intalco's SO<sub>2</sub> Attainment Plan (SIP revision)
  - Agreed Order #21310
- Our proposal includes:
  - Permanent and enforceable controls on SO<sub>2</sub> emissions
  - Air quality modeling demonstrating attainment with the above controls
  - The area reaching attainment by, and will stay in attainment after, April 2026
  - Contingency measures to be implemented without further action by EPA
  - Compliance with miscellaneous requirements for attainment plans

# Control strategy: stack configuration changes

- Potline emissions are treated in 6 Centers
  - Baghouse + dry scrubber
- Merge and raise Center stacks
- Raise Bake Oven stack

A view of 6 stacks at Center 2 from the roof of one of the potline buildings.





# Control strategy: emission limits

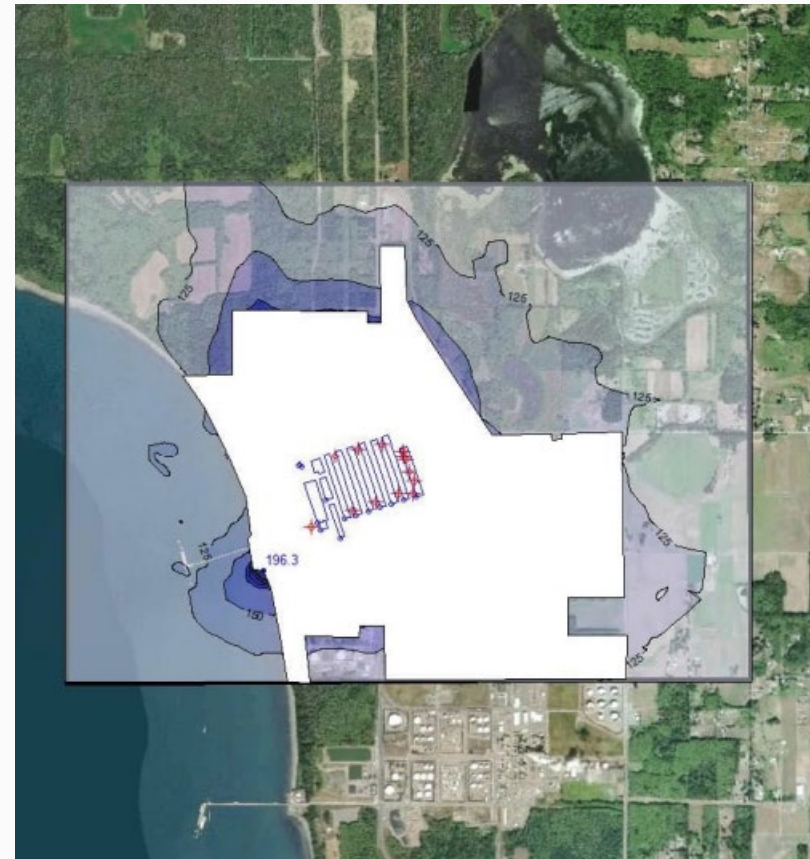
- 5,000 ton per year facility-wide SO<sub>2</sub> limit
- Hourly emission limits at Intalco's SO<sub>2</sub> emission sources
  - Potline Centers
  - Bake Oven
  - Casthouse operations (minor source of SO<sub>2</sub>)
- How will emissions be measured and reported?
  - Continuous monitoring systems or quarterly stack testing
  - Natural gas sulfur content
  - Monthly reporting

# Agreed Order #21310

- Permanent and enforceable
- Control strategy
  - Stack configuration changes
  - SO<sub>2</sub> wet scrubber
  - Emission limits
- Timeline for control strategy
  - April 30, 2025
  - Prior to restart if the facility is still curtailed

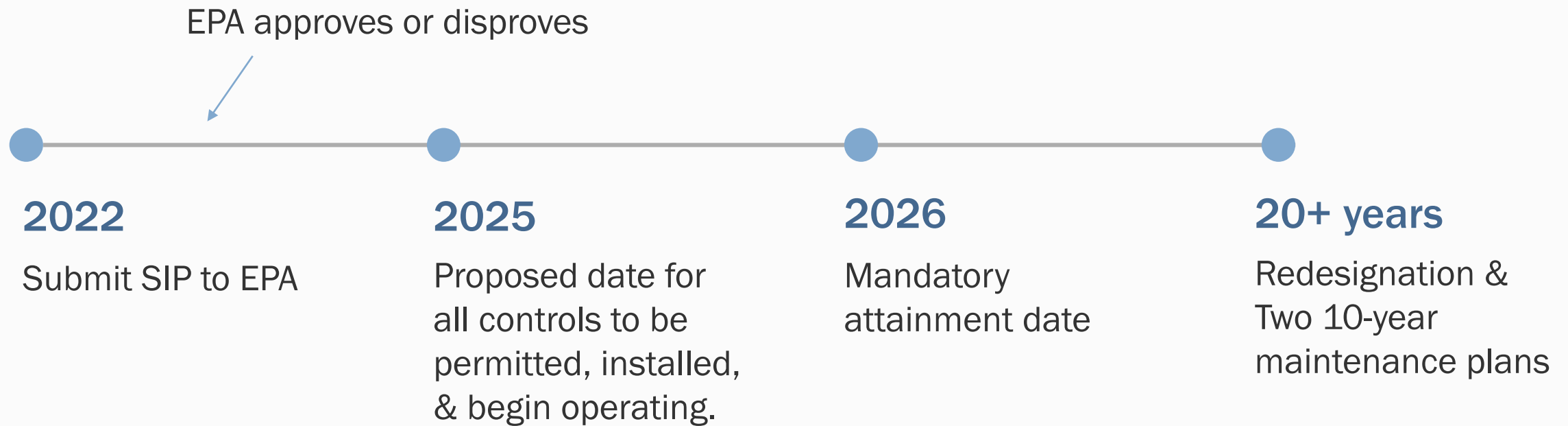
# Modeling protocol and results

- We worked with Intalco and EPA to develop a modeling protocol
  - Defined the modeling inputs and other modeling variables
- All model runs showed compliance with the 1-hour SO<sub>2</sub> NAAQS





# Timeline



If the facility stays curtailed past 2025,  
it cannot restart without first installing the controls.



# Questions and Answers

- We will answer clarification questions about today's presentation or about the SIP revision timeline and process.
- To locate the Raise Hand function in the web browser:
  - Click on the button at the bottom of your screen that says “**Raise Hand**”
  - To lower your hand, follow these same steps
- To indicate you have raised your hand on the phone, press **\*9**
  - To lower your hand, press **\*9** again

# Public Hearing: Intalco SO<sub>2</sub> Attainment Plan



- Now we will begin the hearing.
- It will be recorded for documentation.

## To testify:

- Please click the “Raise Hand” button at the bottom of your screen, or press \*9 if on the phone, to indicate you would like to testify.
  - If you can’t find the hand button please use the chat to let the meeting host know you want to testify
- When I call your name, your line will be unmuted and you may begin your oral testimony.
- Please state and spell your name for the record.
- Please remember to speak clearly so that we can get a clear recording.
- Once you have provided your testimony, please lower your hand.



**Comment by October 15, 2022**

**Online:**

<https://aq.ecology.commentinput.com/?id=aKig>

**By mail:**

Department of Ecology  
Solid Waste Management Program  
Industrial Section  
Attn: Kelsey Brotherton (Holbrook)  
P.O. Box 47600  
Olympia, WA, 98504-7600

# Thank you!

- Contact:

**Anya Caudill**

[Anya.Caudill@ecy.wa.gov](mailto:Anya.Caudill@ecy.wa.gov)

(360) 791-5499

**Kelsey Brotherton (Holbrook)**

[Kelsey.Holbrook@ecy.wa.gov](mailto:Kelsey.Holbrook@ecy.wa.gov)

(360) 280-2668

- Subscribe to email notices:

- <https://ecology.wa.gov/Email-lists>

- “Air Quality Rule and State Implementation Plan (SIP) updates”
- “Sulfur dioxide (SO<sub>2</sub>) attainment”