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June 10, 2015

Docket ID No. EPA-HQ-OAR-2012-0319  
Proposed Rulemaking – Federal Plan Requirements  
for SSI Units Constructed before October 14, 2010  
Environmental Protection Agency  
EPA Docket Center (EPA/DC)  
Mail Code 28221T  
1200 Pennsylvania Avenue, NW  
Washington, CD 20460

Comments from Puget Sound Clean Air Agency  
Proposed Rulemaking – Federal Plan Requirements for Sewage Sludge  
Incinerator (SSI) Units Constructed before October 14, 2010  
Docket ID No. EPA-HQ-OAR-2012-0319

The Puget Sound Clean Air Agency appreciates the opportunity to provide comments on this proposed rule which would create the Federal Plan requirements to create enforceable conditions identified in the finalized Emission Guidelines (40 CFR 60, Subpart M). This letter is provided to be clear about our intentions to seek delegation of the Federal Plan for SSI units, as described in Section VII (*Implementation of the Federal Plan and Delegation*) of the proposal preamble.

As a local air authority in Washington State, our agency has an approved Title V program and has received regular delegation approvals for NSPS and NESHAP regulations (both 40 CFR 61 and 63). The most recent delegation approvals from EPA Region 10 were signed on February 19, 2015 and included the NSPS delegation for the rule which applies to new SSI units (40 CFR 60, Subpart L).

There are two existing SSI units in our jurisdiction and each of those sources has submitted a complete Title V application, as required by the EPA rulemaking for existing SSI units (Emission Guidelines in 40 CFR 40, Subpart M). This agency's preparation of a draft air operating permit for these sites is temporarily on hold in anticipation of the specific requirements outlined in the emission guidelines becoming enforceable provisions. We appreciate EPA proceeding with the Federal Plan for these units as it addresses an important gap for these permits.

In Table 2 of the proposal (*Status of State Plans*), Washington State is included in the list of "VI. States from which the EPA has not received a draft or final plan or negative declaration." This letter does not comment on or represent the Washington State view, but the intention of this agency with respect to this rulemaking has always been to seek delegation of the Federal Plan as soon as it was possible to do so. The EPA should consider our agency in the group of agencies listed in Table 2 and described as "VII. States Anticipated to Accept Delegation of Federal Plan." We will expedite our request for this delegation as soon as this

rulemaking is finalized, noting the instructions in the preamble for the delegation request. Again, we appreciate the opportunity to offer these comments, and EPA's efforts to finalize these plan requirements in a timely manner. Please feel free to contact me if you have any questions about these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Kenworthy', with a stylized flourish at the end.

Craig Kenworthy  
Executive Director

cc: Dennis McLerran, EPA Region 10  
Kate Kelly, EPA Region 10  
Bill Becker, NACAA  
Stu Clark, Washington Dept. of Ecology