



# **Response to Comments:**

## **State Implementation Plan Revision**

*for Spokane County Second 10-Year  
Limited Maintenance Plan for PM<sub>10</sub>*

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December 2015  
Publication no. 15-02-023

## Publication and Contact Information

This report is available on the Department of Ecology's website at <https://fortress.wa.gov/ecy/publications/SummaryPages/1502023.html>

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**Response to Comments:  
State Implementation Plan Revision**

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**for Spokane County Second 10-Year  
Limited Maintenance Plan for PM<sub>10</sub>**

Air Quality Program  
Washington State Department of Ecology  
Olympia, Washington

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# Acknowledgements

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- Washington State Department of Ecology
  - Laurie Hulse-Moyer
  - Diane Butorac
  - Farren Herron-Thorpe
  - Stephanie Summers
  
- Spokane Regional Clean Air Agency
  - Ron Edgar
  - Margee Chambers
  - Julie Oliver

# Executive Summary

Spokane Regional Clean Air Agency has prepared a second 10-year limited maintenance plan (LMP) for Spokane County PM<sub>10</sub> Maintenance area. Ecology is submitting it to Environmental Protection Agency (EPA) for inclusion in Washington's State Implementation Plan (SIP).

The Spokane County Maintenance Area (SCMA) includes the cities of Spokane, Spokane Valley, Millwood, and surrounding unincorporated areas. In the 1980's, the SCMA violated the 24-hour standard for PM<sub>10</sub>. At that time, EPA designated the area as nonattainment. Windblown dust, re-entrained road dirt and sanding material, unpaved road dust, and smoke from woodstoves and fireplaces all contributed to the violations.

Ambient air monitoring data shows that the SCMA has been in attainment of the PM<sub>10</sub> standard since 1994. In 2005, an attainment SIP revision and maintenance plan was approved and the area was re-designated to attainment. When an area is being re-designated to attainment, the Clean Air Act (CAA) requires the development of two EPA-approved maintenance plans. These plans show how the area will continue compliance with the standard that was violated.

The SCMA's first plan ran from 2005-2015. The second plan will run from 2015-2025. The updated plan does not add rules or change requirements, but continues the same control strategies developed in 2005. PM<sub>10</sub> levels have dropped in the area and pollution levels from population growth and increases in vehicle use are not expected to exceed the standard. Due to this expectation, Ecology is able to submit a simplified plan called a Limited Maintenance Plan—or LMP, to revise the SIP.

The PM<sub>10</sub> LMP SIP revision explains how the SCMA will continue to meet the PM<sub>10</sub> standard through 2025. Ecology is adopting the SIP revision and will submit it to EPA for approval into Washington's SIP.

Ecology provided public notice of its proposed adoption of the PM<sub>10</sub> LMP and SIP revision. Comments were accepted from October 1 through November 9, 2015. One comment was received. There were no requests for a public hearing.

The purpose of this Response to Comments is to:

- Meet the federal CAA requirements that agencies prepare a response to comments.
- Provide reasons for adopting the SIP revision.
- Describe any difference between the proposed SIP revision and the adopted SIP revision.
- Provide Ecology's response to comments.

To see more information related to this SIP revision, please visit our [Maintenance SIP site \(http://www.ecy.wa.gov/programs/air/sips/plans/maintenancesip.htm\)](http://www.ecy.wa.gov/programs/air/sips/plans/maintenancesip.htm).

# Reasons for Adopting SIP Revision

In the 1980s, Spokane was designated as being in nonattainment for the federal health-based NAAQS for coarse particle pollution, PM<sub>10</sub>. Not meeting this standard puts people's health at risk and triggers strict federal requirements that impose economic constraints on the area in order to bring the area back into attainment.

Ambient air monitoring shows that the Spokane County Maintenance Area (SCMA) has been in attainment of the PM<sub>10</sub> standard since 1994. The CAA requires an area being re-designated to attainment have an EPA-approved maintenance plan that provides for the area's continued compliance with the PM<sub>10</sub> standard for 10 years. A second 10-year plan must follow the first. This SIP revision is for the Spokane County Washington, Second 10-year Limited Maintenance plan for PM<sub>10</sub>. This plan:

- Meets the requirement for a second 10-year plan,
- Covers the period through 2025, and
- Fulfills the final maintenance plan requirement of the CAA.

Ecology is adopting this SIP revision to:

- Improve air quality and help the area continue to meet health-based federal air quality standards for PM<sub>10</sub>.
- Fulfill the CAA maintenance planning requirements.

## Differences Between the Proposed SIP Revision and Adopted SIP Revision

There are no differences between the proposed and adopted SIP revision.

# Summary of Public Involvement Process

Ecology posted a notice of the public comment period and the request for hearing on its public involvement calendar and web site. A legal notice was published in The Spokesman Review on October 2, 2015. A notice was sent to Ecology's [Air Quality Rule and State Implementation Plan Updates](#) email list (listserv), as well as other social media outreach including Facebook and Twitter posts. A joint news release was issued by Ecology and Spokane Regional Clean Air Agency (SRCAA) on October 1, 2015. SRCAA assisted with outreach efforts by posting information on their website, sending a notice to their regulatory update list serve, and stakeholder outreach emails. Copies of these documents are included.

Ecology accepted comments from October 1, 2015 through November 9, 2015. There were no requests for a public hearing.

# Affidavit of Publication, Legal Notice, Spokesman Review, October 2, 2015

\*Federal Tax ID No. 68-0617327

## AFFIDAVIT OF PUBLICATION

STATE OF WASHINGTON  
County of Spokane} ss

State of Washington  
Notice of Opportunity to Comment and Request a Hearing  
Ecology proposes to include Spokane Regional Clean Air Agency's updated particulate matter maintenance plan in the Washington's air quality plan called the State Implementation Plan (SIP). This maintenance plan update is required by EPA to show how Spokane County will continue to meet federal air quality standards for particulate matter. No new rules, requirements, or changes to existing state or local rules are being proposed.  
You may review and comment on the proposed plan update from October 1, 2015 through November 3, 2015. More information about SIPs and the document is available at: <http://www.ecy.wa.gov/programs/air/sips/plans/maintenance.htm>  
To comment:  
Email to: [ADComments@ecy.wa.gov](mailto:ADComments@ecy.wa.gov)  
Mail to: Laurie Hulse-Moyer, Department of Ecology, PO Box 47600, Olympia, WA 98504-7600  
To request a hearing:  
Email: [miafo@laurie.hulse-moyer@ecy.wa.gov](mailto:miafo@laurie.hulse-moyer@ecy.wa.gov)  
Call: 360-407-6783  
If a hearing is requested, it will be held November 3, 2015 at 9:30 am and 6 pm at Spokane Regional Clean Air Agency, 3104 E Augusta Avenue, Spokane, WA 99207. Requests for hearings must be received no later than 5 pm October 23, 2015. If a hearing request is not received, Ecology will announce a cancellation on its Public Involvement Calendar.  
SR30010

Name: WA St. Dept. of Ecology Client ID: 47180  
PO No. SR30010 No. Lines: 55  
Total Cost: \$236.05 Order No. 198564

I, Jean Robinson  
do solemnly swear that I am the Principal Clerk of The Spokesman-Review, a newspaper established and regularly published, once each day in the English language, in and of general circulation in the City of Spokane County, Washington; and in the City of Coeur d'Alene, Kootenai County, Idaho; that said newspaper has been so established and regularly published and has had said general circulation continuously for more than six (6) months prior to the 23rd day of July, 1941; that said newspaper is printed in an office maintained at its place of publication in the City of Spokane, Washington; that said newspaper was approved and designated as a legal newspaper by order of the Superior Court of the State of Washington for Spokane County on the 23rd day of July, 1941, and that said order has not been revoked and is in full force and effect; that the notice attached hereto and which is a part of the proof of publication, was published in said newspaper one time(s), the publication having been made once each time on the following dates:

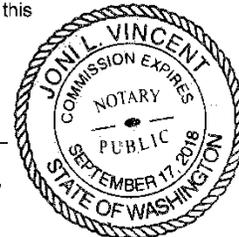
October 2, 2015

That said notice was published in the regular and entire issue of every number of the paper during the period of time of publication, and that the notice was published in the newspaper proper and not in a supplement.

*Jean Robinson*

Subscribed and sworn to before me at the City of Spokane, this 2nd day of October, 2015.

*Joni L. Vincent*  
Notary Public in and for the State of Washington,  
residing at Spokane County, Washington



Notary Stamp  
Paper Affidavits.xls

# News Release or Blog, October 1, 2015

Spokane County plans for another decade of clean air | Washington State Department of Ecology

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FEEDBACK

[Ecology home](#) > [News](#) > News Release

## Department of Ecology News Release - October 1, 2015

### Spokane County plans for another decade of clean air Public comment sought on updated air quality plan

SPOKANE – Thanks to the efforts of citizens and local governments, Spokane County has met federal air quality standards for the past 20 years. And to help continue the trend for the next decade, an updated air quality plan lays out how the county will continue to meet health-based standards through 2025.

The Washington Department of Ecology and Spokane Regional Clean Air Agency invite the public to review and comment on this draft 10-year plan through Nov. 9, 2015. This plan details how Spokane County will stay in compliance with the [National Ambient Air Quality Standard](#) for particle pollution in the air.

The updated plan does not add rules or change requirements, but continues the same control strategies that are in place from the [county's first maintenance plan](#) developed in 2005. These strategies include street cleaning, paving requirements for parking lots, temporary burn bans for woodstoves, emission requirements for new stoves, limits on some major industrial sources, and air quality monitoring.

### Cleaning up and maintaining clean air

In the 1980s, the urbanized areas of Spokane County violated national air quality standards for particle pollution. This area includes the cities of Spokane, Spokane Valley, Millwood and surrounding unincorporated areas. The violations led to the area being designated a non-attainment area by the U.S. Environmental Protection Agency in 1990. Ecology and Spokane Regional Clean Air Agency then had to develop an initial plan to clean up air quality and keep it clean.

Since then, Spokane County has reduced air particle pollution levels to a point that, even with population and vehicle use growth, they're not expected to exceed the national standard. This improvement qualifies the area for a streamlined plan, called a Limited Maintenance Plan, to fulfill the requirements. The updated plan is the final federal planning requirement for areas once in violation of the standard. Learn more about the process on [Ecology's website](#).

### Submitting comments

The draft plan is available for review [online](#). The deadline to submit comments is Nov. 9. Citizens may also request a hearing. Hearing requests must be received no later than Oct. 23.

To submit public comments, or request a hearing, please email Ecology at [AQComments@ecy.wa.gov](mailto:AQComments@ecy.wa.gov) or send to:

[Laurie Hulse-Moyer](#), Washington State Department of Ecology P.O. Box 47600 Olympia, WA 98504-7600

If a hearing is requested by the deadline, hearings will be held at 9:30 a.m. and 6:00 p.m. on Nov. 5 at Spokane Regional Clean Air Agency offices, 3104 E. Augusta Ave., Spokane. If no hearing is requested, Ecology will announce a cancellation on its [public involvement calendar](#).

Ecology will review and consider all comments before submitting the plan to EPA. All comments will be summarized and published along with Ecology's responses.

**Contact:**

[Jessica Payne](#), Ecology communications, 360-407-7647, [@ecyspokane](#)

[Margee Chambers](#), Spokane Clean Air public information, 509-477-4727 ext. 114

<http://www.ecy.wa.gov/news/2015/139.html>[10/1/2015 10:40:50 AM]

# Ecology website, October 1, 2015

State Implementation Plan | Washington State Department of Ecology


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## Air Quality

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Indoor Burning

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Criteria Pollutants:  
*NAAQS*

Air Quality Designations:  
*Maintenance Areas*  
*Nonattainment Areas*

Plans:  
*Attainment SIPs*  
*Maintenance SIPs*  
*Infrastructure, Rule, and Program SIPs*  
*Transportation Conformity*

**Air Monitoring**

Air Quality Requirements for Business & Industry  
Air Emissions Inventory  
Regional Haze  
Washington Clean Air Agencies

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Forms  
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Public Records  
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[Air Quality](#) > [Air Quality Standards & Plans](#) > [SIPs](#) > [Maintenance SIPs](#)

### Maintenance SIPs

Once a nonattainment area has reached and maintained the National Ambient Air Quality Standards (NAAQS), Washington may request redesignation to attainment. For the area to be redesignated, the state has to develop a Maintenance State Implementation Plan (SIP) for EPA's approval. The plan ensures the area will continue to meet the NAAQS for a 20-year period. The initial 10-year plan is reviewed and revised to cover a second 10-year period. For this final plan, some areas may qualify to submit a streamlined plan, called a Limited Maintenance Plan.

Maintenance plans are shown below. Summaries for Washington's attainment and maintenance plans are on [EPA's web site](#).

#### Maintenance Plans

SIP Revision	More Information
<p><a href="#">Proposed Second 10-year Particulate Matter (PM<sub>10</sub>) Limited Maintenance Plan for Spokane area</a></p> <ul style="list-style-type: none"> <li>• <a href="#">News Release</a></li> </ul>	<p>Spokane Regional Clean Air Agency prepared a maintenance plan for the Spokane County PM<sub>10</sub> Maintenance area and submitted it to Ecology for inclusion in the SIP. Ecology is providing an opportunity to comment and request a hearing.</p> <p>Since 1994, this maintenance area has met the PM<sub>10</sub> standard. EPA approved the first 10-year plan for the area in 2005. This second plan shows how the area will continue to meet the NAAQS through 2025.</p> <p><b>Public Comment Period:</b> October 1 - November 9, 2015</p> <p><b>Public hearings, if requested :*</b> November 5, 2015, 9:30 a.m. and 6 p.m. Spokane Regional Clean Air Agency 3104 East Augusta Avenue</p> <p>* Last day to request a hearing: October 23, 2015. If a hearing is not requested by the deadline, a cancellation notice will be posted on Ecology's <a href="#">Public Involvement Calendar</a>.</p> <p>Send comments to <a href="mailto:AQcomments@ecy.wa.gov">AQcomments@ecy.wa.gov</a>.</p> <p>Contact <a href="#">Laurie Hulse-Moyer</a> at 360-407-6783.</p>
<p><a href="#">Second 10-Year Particulate Matter (PM<sub>10</sub>) Maintenance Plan for three Puget Sound areas</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Response to Comments</a></li> </ul>	<p>The Puget Sound Clean Air Agency developed a maintenance plan for three areas:</p> <ul style="list-style-type: none"> <li>• Tacoma Tidelands</li> <li>• Kent Valley</li> <li>• Seattle-Duwamish</li> </ul> <p>Since 1990, all three maintenance areas have met the PM<sub>10</sub> standard. This second plan shows how the areas will continue to meet the NAAQS through 2020. EPA approved it on August 20, 2014. <a href="#">Federal Register notice</a></p>
<p><a href="#">SIP Revision for the Thurston County Second 10-year Limited Maintenance Plan for Particulate Matter (PM<sub>10</sub>)</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Frequently Asked Questions</a></li> </ul>	<p>Ecology accepted comments from April 22 - May 31, 2013. No hearing was requested and no comments were received. Ecology submitted the plan to EPA on July 1, 2013. EPA accepted comments through September 4, 2013. EPA granted final approval October 3, 2013. <a href="#">Federal Register notice</a></p>

#### Maintenance Plan Contents

The specific content of each maintenance plan varies depending on the federal requirements and state regulations. In general, a maintenance plan covers the following:

- Current, comprehensive, and accurate inventories of emissions from all sources.
- Control strategies to maintain the NAAQS.
- Supporting statutes and regulations.
- Other means or programs contributing to maintenance of the NAAQS.
- Air quality analyses that demonstrate that adequate controls are in place to ensure the area will maintain the NAAQS.

<http://www.ecy.wa.gov/programs/air/sips/plans/maintenancesip.htm>[11/8/2015 3:21:03 PM]

# Ecology Public Involvement Calendar Notices

## Announcing Opportunity to Comment and Request a Hearing

Public Involvement Calendar - WA Dept of Ecology

**CALENDAR**

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### Public Involvement Calendar

The Public Involvement Calendar is designed to engage the public in our **decision-making process**. We encourage you to read [Frequently Asked Questions about Effective Public Commenting](#).

Activities that are educational only or are co-sponsored by Ecology may be found under the "More Ecology Events" link in the left column of this page. We invite your [feedback](#) about this Public Involvement Calendar.

### Public Hearings, Meetings, Workshops, Open Houses

(Next 21 days. Use the search feature (right) for events beyond 21 days.)

**Nov 5 2015 9:30AM Public Hearing - Spokane**  
-----  
**Update to Air Quality Maintenance Plan for Spokane Area**  
Ecology proposes to submit to EPA an updated air quality plan for Spokane County. The plan, which will be included in the state's air quality plan, ensures the area will maintain the particle standard through 2025. If the public requests a hearing by October 23, two public hearings will be held in Spokane. If not requested by October 23, the hearings will be cancelled and a cancellation notice will be posted on Ecology's Public Involvement Calendar. There are no new rules or requirements proposed.  
**More Information:** [More Information](#)  
**Location:** Spokane Regional Clean Air Agency  
3104 East Augusta Avenue  
Spokane, WA  
**Sponsor:** Ecology  
ECY HQ  
**Contact:** Laurie Hulse-Moyer  
(360) 407-6783 / [laurie.hulse-moyer@ecy.wa.gov](mailto:laurie.hulse-moyer@ecy.wa.gov)  
**Public Comment Period - Oct 1 2015 - Nov 9 2015**  
**Public Hearing - Nov 5 2015 6:00PM**

**Nov 5 2015 6:00PM Public Hearing - Spokane**  
-----  
**Update to Air Quality Maintenance Plan for Spokane Area**  
Ecology proposes to submit to EPA an updated air quality plan for Spokane County. The plan, which will be included in the state's air quality plan, ensures the area will maintain the particle standard through 2025. If the public requests a hearing by October 23, two public hearings will be held in Spokane. If not requested by October 23, the hearings will be cancelled and a cancellation notice will be posted on Ecology's Public Involvement Calendar. There are no new rules or requirements proposed.  
**More Information:** [More Information](#)  
**Location:** Spokane Regional Clean Air Agency  
3104 East Augusta Avenue  
Spokane, WA  
**Sponsor:** Ecology  
ECY HQ  
**Contact:** Laurie Hulse-Moyer  
(360) 407-6783 / [laurie.hulse-moyer@ecy.wa.gov](mailto:laurie.hulse-moyer@ecy.wa.gov)  
**Public Comment Period - Oct 1 2015 - Nov 9 2015**  
**Public Hearing - Nov 5 2015 9:30AM**

**Oct 01 2015 Public Comment Period - Spokane**  
**Nov 09 2015 Update to Air Quality Maintenance Plan for Spokane Area**  
Ecology proposes to submit to EPA an updated air quality plan for Spokane County. The plan, which will be included in the state's air quality plan, ensures the area will maintain the particle standard through 2025. If the public requests a hearing by October 23, two public hearings will be held in Spokane. If not requested by October 23, the hearings will be cancelled and a cancellation notice will be posted on Ecology's Public

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<https://fortress.wa.gov/ecy/publiccalendar/>[10/1/2015 8:29:07 AM]

Involvement Calendar. There are no new rules or requirements proposed.

**More Information:** [More Information](#)

**Location:**

Spokane , WA

**Sponsor:** Ecology

ECY HQ

**Contact:** Laurie Hulse-Moyer

(360) 407-6783 / [laurie.hulse-moyer@ecy.wa.gov](mailto:laurie.hulse-moyer@ecy.wa.gov)

**Public Hearing - Nov 5 2015 6:00PM**

**Public Hearing - Nov 5 2015 9:30AM**

First 1 Last



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## Spokane Regional Clean Air Agency News Release, October 1, 2015



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[Public comment sought on Spokane County's updated air quality plan](#)

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The Washington Department of Ecology and Spokane Regional Clean Air Agency invites the public to review and comment on this draft second ten-year plan, called the [PM<sub>10</sub> Limited Maintenance Plan](#). This plan shows how Spokane County will stay in compliance with the [National Ambient Air Quality Standard](#) (NAAQS) for Particulate Matter 10 microns or less (PM<sub>10</sub>.) The public can review and comment on the plan now through November 9, 2015.

The updated plan does not add rules or change requirements for controlling PM<sub>10</sub>, but continues the same control strategies that are in place from the county's first maintenance plan developed to address air quality from 2005 through 2015. These control strategies include street cleaning inside the maintenance area, paving requirements for parking lots, temporary bans on woodstove use during periods of poor air quality, emission requirements for new stoves, limits on some major industrial sources and air quality monitoring.

### **Cleaning up and maintaining clean air**

In the 1980s, the urbanized areas of Spokane County violated the NAAQS for PM<sub>10</sub>. This area includes the cities of Spokane, Spokane Valley, Millwood and surrounding unincorporated areas. The violations led to the area being designated a non-attainment area by the U.S. Environmental Protection Agency (EPA) in 1990. Ecology and Spokane Regional Clean Air Agency had to develop an initial plan to clean up air quality and keep it clean.

Spokane County has shown that PM<sub>10</sub> levels have dropped to a point that the population and vehicle use growth are not expected to cause pollution levels to exceed the national standard. Due to this, the area qualifies for a streamlined plan, called a Limited Maintenance Plan, to fulfill the requirements. The updated plan is the final federal requirement for areas once in violation of the standard. Learn more about the process on [Ecology's Air Quality webpage](#).

## Submitting comments

The [plan](#) is available for review. The deadline to submit comments is November 9, 2015. Citizens may also request a hearing. Hearing requests must be received no later than October 23, 2015.

To submit public comments on the plan, or request a hearing, please email [Laurie Hulse-Moyer](mailto:Laurie.Hulse-Moyer@ecology.wa.gov) or mail Ecology at:

Laurie Hulse-Moyer  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

If a hearing request is received by the deadline, two hearings will be held November 5, 2015 at 9:30 a.m. and 6:00 p.m., at Spokane Regional Clean Air Agency offices, 3104 E. Augusta Avenue, Spokane, WA 99207. If a hearing request is not received, Ecology will announce a cancellation online on its [public involvement calendar](#).

Ecology will review and consider all comments before submitting the plan to EPA. All comments will be summarized and published along with Ecology's responses.

3104 E Augusta Ave, Spokane, WA 99207 · (509) 477-4727 · working with you for  
clean air

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## Spokane Regional Clean Air Outreach,

### September 28 and 29 Email and Stakeholder List

**SRCAA Stakeholder Outreach** - from Margee Chambers, SRCAA  
9/28/15 & 9/29/15, emails sent to local stakeholders:

City of Millwood

- Tom Richardson, [Tom.richardson@millwoodwa.us](mailto:Tom.richardson@millwoodwa.us)

City of Spokane

- Mark Serbousek, Director of Street Department 232-8810  
[mserbousek@spokanecity.org](mailto:mserbousek@spokanecity.org)  
901 N Nelson  
Spokane, WA 99202

City of Spokane Valley

- Art Jenkins, Stormwater Engineer 720-5018  
[ajenkins@spokanevalley.org](mailto:ajenkins@spokanevalley.org)  
11707 E Sprague, Suite 106  
Spokane Valley, WA 99206

Spokane County

- Greg Baldwin, Road Department phone #  
[gbaldwin@spokanecounty.org](mailto:gbaldwin@spokanecounty.org)  
Public Works Building  
1026 W Broadway  
Spokane, WA 99260
- Bob Keneally, Operations & Maintenance Superintendent 477-3600  
[rkeneally@spokanecounty.org](mailto:rkeneally@spokanecounty.org)  
1026 W Broadway  
Spokane, WA 99260
- John Pederson, Planning Director 477-7212  
[Jpederson@spokanecounty.org](mailto:Jpederson@spokanecounty.org)  
Public Works Building  
1026 W Broadway  
Spokane, WA 99260

Washington State Department of Transportation

- Doug Bierce, Assistant Maintenance Superintendent, Spokane Area 1 324-6591  
[bierced@wsdot.wa.gov](mailto:bierced@wsdot.wa.gov)  
2714 N Mayfair  
Spokane, WA 99207

CAPR-Spokane Chapter

- John [nwgrassroots@gmail.com](mailto:nwgrassroots@gmail.com)
- Cindy Zapotockey, chapter president [zapox6@afo.net](mailto:zapox6@afo.net)

Sample Email:

Hello \_\_\_\_\_,

I wanted to let you know about an upcoming public comment period for the Second 10-Year Limited Maintenance Plan for PM10. The public comment period for the draft plan runs 10/1-11/9. The draft plan will be posted on our website (under hearings and notices) on October 1 and will provide information on where to send comments.

Some background on why we developed the Second 10-Year Limited Maintenance Plan for PM10:

- Many years ago, our area was violating the federal, health based standards for PM10. As a result, in 1990, we were designated as non-attainment for the PM10 standards.
- That set forth the process of developing an attainment plan and cleaning up our air so we could be redesignated as in- attainment of the standard.
- In 2005 we were designated as in attainment. With this designation we were required to develop two, 10-year maintenance plan to show how we will continue to keep our air clean. The first plan ran from 2005-2015. The second plan will run from 2015-2025.
- No new rules, requirements, or changes to existing state or local rules are being proposed.
- This updated plan is the final step to complete federal requirements for areas once in violation of the standard.

Thank you for your time and your interest in air quality.

## Ecology Listserv Message, October 1, 2015

### Message

**From:** Ecology's Air Quality Rule and State Implementation Plan Updates [<mailto:ECY-AQ-RULE-AND-SIP-UPDATES@LISTSERV.WA.GOV>] **On Behalf Of** Laurie Hulse-Moyer

**Sent:** Thursday, October 01, 2015 3:18 PM

**To:** [ECY-AQ-RULE-AND-SIP-UPDATES@LISTSERV.WA.GOV](mailto:ECY-AQ-RULE-AND-SIP-UPDATES@LISTSERV.WA.GOV)

**Subject:** Washington SIP Notice: Public comment period and opportunity to request a hearing on a SIP revision

- Ecology is accepting comments through November 9, 2015 on a proposed State Implementation Plan (SIP) revision to include Spokane Regional Clean Air Agency's (SRCAA) updated particulate matter maintenance plan in the Washington SIP. Two public hearings, at 9:30 and 6 pm, will be held November 5, if one is requested by October 23.
- Visit Ecology's [Maintenance Plans webpage](#) to see the plan and find out how to comment or request a hearing. Also, see the SRCAA/Ecology joint [news release](#).



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Message sent to subscriber list of 155 people.

# Memo Certifying No Hearing Was Requested

**TO:** STU CLARK, MIA BELLON  
**FROM:** LAURIE HULSE-MOYER, AIR QUALITY PLANNER *LHM*  
**SUBJECT:** CERTIFICATION OF HEARING NOTICE AND PUBLIC COMMENTS FOR SPOKANE COUNTY  
MAINTENANCE AREA SIP REVISION  
**DATE:** NOVEMBER 10, 2015  
**CC:** JULIE OLIVER-SRCAA, ANYA CAUDILL-ECY, NANCY PRITCHETT-ECY

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I certify that Ecology did not receive a request for a hearing on the Spokane County Maintenance Area (SCMA) SIP Revision by the deadline; we received one comment during the comment period, which ended November 9<sup>th</sup>.

A Notice was published in the October 2, 2015 Spokanesman Review that opened the public comment period and offered the community an opportunity to request a hearing. This announcement provided a full 30 days comment period before the hearing. The Spokane Regional Clean Air Agency SIP Revision submittal letter includes attachments documenting the public process for this submittal and includes evidence that Ecology offered to hold the public hearing in accordance with the requirements of 40 CFR §51.102.

*Laurie Hulse-Moyer*

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Laurie Hulse-Moyer, Project Lead

# Hearing Cancellation Notice/Public Involvement Calendar, October 26, 2015

Public Involvement Calendar	
<b>CALENDAR</b>	
Public Hearings, Meetings, Workshops, Open Houses	<h2>Public Involvement Calendar</h2> <p>The Public Involvement Calendar is designed to engage the public in our <b>decision-making process</b>. We encourage you to read <a href="#">Frequently Asked Questions about Effective Public Commenting</a>.</p> <p>Activities that are educational only or are co-sponsored by Ecology may be found under the "More Ecology Events" link in the left column of this page. We invite your <b>feedback</b> about this Public Involvement Calendar.</p>
Public Comment Periods	
<a href="#">More Ecology Events</a>	
	<h2>Public Hearings, Meetings, Workshops, Open Houses</h2> <p>(Next 21 days. Use the search feature (right) for events beyond 21 days.)</p>
	<b>Nov 5 2015 9:30AM Public Hearing - Spokane</b> <b>----- HEARING CANCELLED: Update to Air Quality Maintenance Plan for Spokane Area</b> Ecology proposes to submit to EPA an updated air quality plan for Spokane County. The plan, which will be included in the state's air quality plan, ensures the area will maintain the particle standard through 2025. If the public requests a hearing by October 23, two public hearings will be held in Spokane. If not requested by October 23, the hearings will be cancelled and a cancellation notice will be posted on Ecology's Public Involvement Calendar. There are no new rules or requirements proposed. <b>More Information:</b> <a href="#">More Information</a> <b>Location:</b> Spokane Regional Clean Air Agency  3104 East Augusta Avenue Spokane , WA  <b>Sponsor:</b> Ecology ECY HQ <b>Contact:</b> Laurie Hulse-Moyer (360) 407-6783 / <a href="mailto:laurie.hulse-moyer@ecy.wa.gov">laurie.hulse-moyer@ecy.wa.gov</a> <b>Public Comment Period - Oct 1 2015 - Nov 9 2015</b> <b>Public Hearing - Nov 5 2015 6:00PM</b>

**Nov 5 2015 6:00PM Public Hearing - Spokane**

----- **HEARING CANCELLED: Update to Air Quality Maintenance Plan for Spokane Area**

Ecology proposes to submit to EPA an updated air quality plan for Spokane County. The plan, which will be included in the state's air quality plan, ensures the area will maintain the particle standard through 2025. If the public requests a hearing by October 23, two public hearings will be held in Spokane. If not requested by October 23, the hearings will be cancelled and a cancellation notice will be posted on Ecology's Public Involvement Calendar. There are no new rules or requirements proposed.

**More Information:** [More Information](#)

**Location:** Spokane Regional Clean Air Agency

3104 East Augusta Avenue

Spokane , WA 

**Sponsor:** Ecology

ECY HQ

**Contact:** Laurie Hulse-Moyer

(360) 407-6783 / [laurie.hulse-moyer@ecy.wa.gov](mailto:laurie.hulse-moyer@ecy.wa.gov)

**Public Comment Period - Oct 1 2015 - Nov 9 2015**

**Public Hearing - Nov 5 2015 9:30AM**

**Oct 01 2015 Public Comment Period - Spokane**

**Nov 09 2015 HEARING CANCELLED: Update to Air Quality Maintenance Plan for Spokane Area**

Ecology proposes to submit to EPA an updated air quality plan for Spokane County. The plan, which will be included in the state's air quality plan, ensures the area will maintain the particle standard through 2025. If the public requests a hearing by October 23, two public hearings will be held in Spokane. If not requested by October 23, the hearings will be cancelled and a cancellation notice will be posted on Ecology's Public Involvement Calendar. There are no new rules or requirements proposed.

**More Information:** [More Information](#)

**Location:**

Spokane , WA 

**Sponsor:** Ecology

ECY HQ

**Contact:** Laurie Hulse-Moyer

(360) 407-6783 / [laurie.hulse-moyer@ecy.wa.gov](mailto:laurie.hulse-moyer@ecy.wa.gov)

	<b>Public Hearing - Nov 5 2015 6:00PM</b> <b>Public Hearing - Nov 5 2015 9:30AM</b>
	Last
	
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## Response to Comments

Ecology received one comment from the public on the proposed SIP revision. This section includes the comment and Ecology’s response. Below is a copy of the original, unaltered text for the comment received.

### Comment Received from Fred Greef, November 8, 2015

Spokane PM10 Air Quality 10-Year Plan - Message (HTML)

FILE
MESSAGE
DEVELOPER

Sun 11/8/2015 7:28 PM

Fred Greef <fredgreef@gmail.com>

Spokane PM10 Air Quality 10-Year Plan

To: ECY RE AQComments

Message
PM10 Plan for Spokane.docx (20 KB)

Please see attached comments on the new 10-year Spokane PM10 Air Quality Attainment Plan.

Thanks Much,  
Fred Greef (private Washington citizen)

## PM10 Plan for Spokane (2015)

Thank you for this opportunity to comment on your 10-year PM10 Attainment Plan.

I have only one real concern, and that is the particulate and the diesel emissions from the huge potential increase in unit-train traffic through Spokane. Because there is much uncertainty as to the total number of additional unit trains passing slowly through Spokane over the next ten years, each one with about one hundred plus cars using multiple huge dirty diesel engines, there really needs to be some worst-case emissions modeling for locomotive traffic routes through Spokane residential areas.

At least a seven to 10-fold increase in trains per week passing through Spokane is possible (if not likely) based on several current proposals to transport Bakken crude oil from North Dakota and Montana, Canadian oil-sand bitumen from Alberta, and open coal cars from Powder River Basin of Wyoming. The recent Ecology oil train safety study projected about a seven-fold increase, but that study was flawed and did not include all the likely transport increases, nor potential additional increases if ports open in Oregon. Three of the primary authors of Ecology's "Rail Safety" study, David Hatzenbuehler, Robert G. Patton, Eric Lyman used of the Texas-based company MainLine Management—all held senior positions with Burlington Northern Santa Fe railroad company for decades. Worst-case impacts and maximum unit-train numbers were not fairly considered. Air quality monitoring was definitely not well addressed.

Spokane needs to consider both PM-10 24-hour monitoring and PM-2.5 one-hour monitoring, in at least one or two residential neighborhoods, near the unit-train rail routes through the Spokane area. Some initial pilot studies should be conducted as a starting point to multiply by the worst-case likely potential increases in locomotive and coal dust emissions over the next ten years.

There may be no big threat, but based on similar studies in the Gorge, and in Seattle, there may be real reason for concern, with even a 200 % increase in emissions, let alone a 1000% potential increase over ten years. See: Diesel particulate matter emission factors and air quality implications from in-service rail in Washington State, USA, by Daniel A. Jaffe, Atmospheric Pollution Research 5 (2014) 344-351. Jaffe said a 50% increase in unit-train rail traffic in Seattle could cause a national ambient air quality one-hour PM 2.5 air quality violation. The rail traffic increases through Spokane will be far larger than the anticipated increases through Seattle.

Please at least do enough locomotive diesel emission and coal dust emission modeling to document that Spokane residents, nursing home residents, and school children that are close to the primary unit train routes will not die prematurely because you failed to investigate this documented potential threat to their health and their very lives. Please at least establish one new PM10 24-hour, and two new PM 2.5 one-hour monitors near railroad line adjacent communities in Spokane for a pilot study to help demonstrate that Spokane residents are protected from this new and growing health threat.

Finally, if there are any intersections in Spokane where huge increases in very slow 100-car unit train traffic will temporarily block vehicular traffic, and result in large increases in traffic idle times, I hope that you have also incorporated this kind of worst case traffic modeling estimates into your 10-year plans for both PM10 and PM 2.5. Please let me know if you have done this already, and if you

have done this already, and if you have any PM monitors in rail-adjacent locations that can give you surety of health safety for at least the most susceptible populations (children, schools, elderly, hospitals, nursing homes) and the densest rail-adjacent residential areas.

There are many other communities throughout this state at great risk from a ten-fold increase in unit train traffic, for many other reasons. These include derailment and giant fires and explosions. Please do your part and help at least protect all of us from the potential worst-case air quality threats, by monitoring and modeling to help establish the actual emissions and the future 10-year worst-case emission growth from big diesel engines and open-car coal dust. I know Ecology has excellent air quality modeling staff that can do the requested air quality emission modeling. Your Plan will be far more credible if you can add at least a small demonstration and explanation as to why PM NAAQS will not be violated over the next ten years by huge increases in locomotive coal dust and diesel engine emissions. If this is not done, I hope you can at least share with me your immediate commitment to a science-based inquiry that can truly demonstrate whether these public health air-quality concerns are justified, and whether your air quality plan is fatally flawed.

Thank you very much for this opportunity to comment.

Sincerely,  
Fred Greef (private Washington citizen)

## Ecology's Response

Thank you for your comment. You expressed concern over proposed increases in rail activity, particularly coal and oil cars. Impacts of new facilities serviced by rail are beyond the scope of this Limited Maintenance Plan. However, the following information is provided for your reference.

*Environmental Reviews:* Ecology is a co-lead agency with other federal, state and local agencies for several environmental reviews of separate coal and oil proposals that involve rail transportation. These proposals include the Gateway Pacific Terminal in Whatcom County, the Millennium Bulk Terminals Longview, the Shell rail unloading facility in Anacortes and crude oil export terminals proposed in Grays Harbor (Westway, Imperium and Grays Harbor Rail Terminal).

Potential air quality and rail transportation impacts will be identified in the environmental reviews for each of these proposals, through the State Environmental Policy Act (SEPA) and National Environmental Policy Act (NEPA) processes. Each environmental review has opportunities for public comment.

Below are websites with further information on the status of the environmental review process and opportunities for public comment on each project. If you would like to be notified, sign up on the email lists (listserv) for each review to receive announcements.

- Environmental review of Westway Terminal and Imperium Terminal  
<http://www.ecy.wa.gov/geographic/graysharbor/terminals.html> These Draft Environmental Impact Statements are available for public comment until Nov 30, 2015
- Environmental review of Gateway Pacific Terminal  
<http://www.eisgatewaypacificwa.gov/> and  
<http://www.ecy.wa.gov/geographic/gatewaypacific/>
- Environmental review of Millennium Bulk Terminals Longview  
<http://www.millenniumbulkeiswa.gov/> and  
<http://www.ecy.wa.gov/geographic/millennium/index.html>
- Environmental review of Grays Harbor Rail Terminal  
<http://www.ecy.wa.gov/geographic/graysharbor/ghrt.html>
- Environmental review of Shell Anacortes Rail Unloading Facility  
<http://shellraileis.com/> and <http://www.ecy.wa.gov/geographic/anacortes/shelloil.html>

*Proposed increases in rail traffic:* The Washington State Department of Transportation's "[Washington State Rail Plan Integrated Freight and Passenger Rail Plan 2013-2035](#)" forecasts that at the current 3.4% growth rate for routes in and out of Spokane, the rail lines will be at 150% to 170% of capacity by 2035. These levels cannot be reached without operational changes and/or capital improvements to manage anticipated freight rail volumes. The number and capital

costs of the needed improvements will likely constrain the growth in rail traffic through Spokane.

Based on current capacity it is not possible for a 1,000% increase in rail traffic as was mentioned in the comment letter. The Washington State Department of Transportation (WDOT) [2014 Marine and Rail Oil Transportation Study \(oil train safety study\)](#) predicts the maximum possible increase in rail traffic in Spokane through 2025 would be closer to 50%.

Newer trains ([Tier 3 and 4](#)<sup>1</sup>) have stricter emission standards and would achieve a 50% or 90% reduction in diesel particulate emissions respectively, compared to older trains. Without taking the additional reductions from the stricter standards into account, a 50% increase from Ecology 2011 locomotive emissions would increase annual railroad PM<sub>10</sub> emissions from 42 tons per year to 63 tons per year. In addition, locomotive emissions from fuel use are estimated to be just .22% of overall PM<sub>10</sub> emissions in Spokane County and even a 50% increase for this source category would not cause concern. Fugitive dust emissions from locomotives are not estimated by Ecology, but are not expected to contribute enough for the area to be at risk for violating the PM<sub>10</sub> standard. Lead agencies will determine how individual proposed project SEPA reviews will address fugitive emissions.

The introduction of Tier 4 locomotives and current restrictions in rail infrastructure throughout Idaho and Spokane County, as well as other capacity restrictions along these routes, should minimize any increase in rail traffic through the area for at least the next 10 years, limiting its impact on Spokane's compliance with the PM<sub>10</sub> standard.

*Jaffe Study estimates:* Increase in emissions from rail traffic would be highly unlikely to threaten particulate standards: The Jaffe study was specific to the Tacoma area. Impacts from locomotives are very localized and vary due to area meteorology, terrain and proximity to the tracks. Currently the locomotive emissions for Spokane County from fuel use are about 1% of the fine particle (PM<sub>2.5</sub> or particulate matter 2.5 microns or less) emissions in Spokane. Fugitive emissions are not estimated, but not expected to threaten the area's compliance with particulate matter standards.

*Concerns over blocked crossings:* Increases in vehicle idling emissions at crossings would be more likely to increase carbon monoxide (CO) levels than PM<sub>10</sub>. However, there should be no issues with CO either because most crossings with major arterials in the central business district of Spokane are grade separated, meaning they are at a different levels, like an overpass or a bridge. So there should be no problem with buildup of vehicle emissions, as there would be few blocked crossings. Those few street level crossings in the valley are in open areas with little chance of a buildup of CO emissions.

*Oil train safety study:* You also expressed concerns with the WDOT Department of Transportation's [recent oil train safety study](#). This study was conducted with the Washington Utilities and Transportation Commission, Emergency Management Division and others and was published in March this year. The oil train safety study was intended to assess the environmental impact of an accident and not the long term impact of increased rail traffic. For questions on rail

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<sup>1</sup><http://www3.epa.gov/otaq/standards/nonroad/locomotives.htm>

transportation studies, contact the Washington Department of Transportation Freight Rail office. Contact information is available at <http://www.wsdot.wa.gov/Freight/Rail/default.htm>.

*Future projections using modeling not required:* In order to qualify for the LMP (Limited Maintenance Plan), Ecology and SRCAA had to show that PM<sub>10</sub> levels have dropped to a point that population growth and increases in vehicle use are not expected to cause pollution levels to exceed the standard in Spokane. The area qualified to submit a LMP. Since it is highly unlikely PM<sub>10</sub> emissions will increase significantly, the LMP option does not require future year projections emissions. It is assumed that currently monitored levels are low enough that an emissions increase in any source category will not cause a violation of the standard in the next ten years. Continued monitoring for PM<sub>10</sub> in the out years will alert us if that should prove to not be the case.

*Other efforts:* Several years ago, SRCAA entered into a voluntary partnership with Burlington Northern Santa Fe (BNSF) to have BNSF retrofit up to eleven locomotives with idle reduction technology to reduce air emissions and conserve fuel in Washington. The pool of locomotives retrofitted operates out of the BNSF rail yards in Spokane and Pasco, Washington. Also, in 2012 SRCAA Board directed staff to try to find funding for additional monitoring of PM<sub>2.5</sub> near railways. Any such study would be expensive, requiring both sampling and speciation lab work. A special modeling project is not in the current budgets of the SRCAA or Ecology, and no outside funding is currently available.

We appreciate your compliment of Ecology's modeling staff.

Since the Spokane area measured monitored values are far below the PM<sub>10</sub> standard, this area is at little risk of violating this standard. SRCAA commits to continuing to monitor in the Spokane area through 2025.