STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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October 25, 2019

Chris Hladick
Acting Regional Administrator
U.S. Environmental Protection Agency – Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

RE: Startup, Shutdown, and Malfunction Provisions in Chapters 173-400, 173-405, 173-410, and 173-415 WAC in the Washington State Implementation Plan

Dear Administrator Hladick:

As the Governor's designee for the Washington State Implementation Plan (SIP), I am submitting the revision to **Startup, Shutdown, and Malfunction Provisions in Chapters 173-400, 173-405, 173-410, and 173-415 WAC** in the Washington SIP for your review and approval.

On June 22, 2015, the Environmental Protection Agency (EPA) issued a Startup Shutdown, and Malfunction (SSM) SIP Call. The call identified substantial inadequacies in the EPA approved rules of agencies in 36 states. Washington was one of those states. EPA also articulated the SSM policy together with the SSM SIP Call. In response to the SSM SIP Call and policy, Washington State Department of Ecology (Ecology) adopted amendments to the General Regulations for Air Pollution Sources (Chapter 173-400 WAC), and three industry specific rules for pulping and aluminum plants (Chapters 173-405, 173-410, 173-415 WAC).

Following the amendments of these rules, Ecology offered the public an opportunity to request a hearing and comment on the proposed update of **Startup, Shutdown, and Malfunction Provisions in Chapters 173-400, 173-405, 173-410, and 173-415 WAC** in the Washington State Implementation Plan (SIP). The proposed SIP revision includes provisions that apply to Ecology and Benton Clean Air Agency jurisdictions.

Ecology met all state and federal procedural requirements for public outreach by taking the following actions:

- Announced the public comment period (August 7 through September 13, 2019) and the tentative public hearing date (September 11, 2019) on our website, public input and events listing web page, and through e-mails for subscribers.

- Published a legal notice in the *Seattle Daily Journal of Commerce* on August 7, 2019.

We did not receive a hearing request, and thus we did not hold a public hearing, as allowed by 40 C.F.R. Section 51.102. We did not receive any comments on the proposed SIP revision. As a result, Ecology adopted the proposed revisions on October 24, 2019.

Therefore, I submit this package for your review and approval as a revision to the Washington SIP. Ecology is submitting this SIP revision package through EPA's Central Data Exchange tool for electronic SIP submittal, e-SIP. We will also publish this SIP revision document on our website.

If you have any questions on this submittal, please contact Debebe Dererie at debebe.dererie@ecy.wa.gov or (360) 407-7558.

Sincerely,

Maia D. Bellon
Director

Enclosures: SIP Submittal package

cc: Jeff Hunt, EPA Region 10
Debebe Dererie, Ecology
Records file (with enclosures)