pscleanair.org
Puget Sound Clean Air Agency

Thursday
October 23, 2014
8:45 a.m.

Clean healthy air for
everyone, everywhere,
all the time.

AGENDA

8:45-8:46		*Call to order – Roll Call – Quorum Established*	
8:46-8:50	**I**	**Approval of Minutes**	
		September 25, 2014 Regular Meeting*	**ACTION**
8:50-8:55	**II**	**Petitions from the Public**	
	III	**Personnel and Finance Matters**	
8:55-9:00		A. Approval of Vouchers*	**ACTION**
	IV	**Executive Session**	
9:00-9:15		A. Litigation	
	V	**Public Hearings (none)**	
	VI	**Unfinished Business**	
9:15-9:35		A. Briefing – General Regulatory Order No. 10606 - RACT Determination for Ardagh Glass, Inc.*	
9:35-9:50		B. Preliminary Unaudited FY14 Financial Performance*	
9:50-10:35		C. Strategic Plan Implementation Update – Environmental Justice*	
10:35-11:00		D. FY15 Strategic Plan Deliverables*	
11:00-11:15		E. Tacoma/Pierce County Smoke Reduction Zone (Stove Rule) Outreach*	
	VII	**New Business**	
11:15-11:20		A. Resolution No. 1311 – Disposing of Surplus Monitoring Equipment	**ACTION**
11:20-11:30		B. Management Compensation System*	**ACTION**
11:30-11:50		C. National Climate Study – Pacific Northwest Climate Impacts*	
11:50-12:00	**VIII**	**Staff Reports**	
		A. Executive Director's Report*	
		B. Notice of Construction List*	
		C. Contract List*	

**Document included in the Board packet*

Board of Directors

Bremerton
Patty Lent, Mayor

Everett
Ray Stephanson, Mayor
Paul Roberts, Board Chair

King County
Dow Constantine, Executive

Kitsap County
Charlotte Garrido, Commissioner

Pierce County
Pat McCarthy, Executive

Public-at-Large
Stella Chao

Seattle
Ed Murray, Mayor

Snohomish County
Dave Somers, Councilmember

Tacoma
Ryan Mello, Councilmember

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PHONE, FAX & E-MAIL ROSTER FOR
REGULARLY ATTENDING BOARD MEMBERS
& PUGET SOUND CLEAN AIR AGENCY MANAGEMENT

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PUGET SOUND CLEAN AIR AGENCY
BOARD OF DIRECTORS

REGULAR MEETING MINUTES

September 25, 2014

1904 3rd Avenue, Suite 105
Seattle, WA 98101

Board Members Present:
Eric Baker, representing Charlotte Garrido, Kitsap County Commissioner (by phone)
Stella Chao, representing the Public-at-Large
Ryan Dicks, representing Pat McCarthy, Pierce County Executive
Ryan Mello, City Council Member, City of Tacoma
Eric Parks, representing Dave Somers, Snohomish County Council
Paul Roberts, representing Mayor Ray Stephanson, City of Everett
Jill Simmons, representing Mayor Ed Murray, City of Seattle
Christie True, representing King County Executive Dow Constantine
Larry Willman, representing Mayor Patty Lent, City of Bremerton

Paul Roberts called the meeting to order at 8:49 a.m. The roll was called and there was a quorum present.

I. APPROVAL OF MINUTES

Mr. Roberts asked if there was any discussion regarding the minutes from the July 31, 2014, Board meeting.

There was no Board discussion.

Ryan Mello made a motion that the minutes of the July 31, 2014, Board meeting be approved as presented in the materials sent to the Board. The motion was seconded and passed unanimously.

II. PETITIONS FROM THE PUBLIC

Mr. Roberts asked if there were any petitions from the public.

There were none.

III. PERSONNEL AND FINANCE MATTERS

Approval of Vouchers

Mr. Roberts asked if there was any discussion regarding the vouchers.

Craig Kenworthy pointed out those vouchers that were related to the ScRAPS program.

There was no Board discussion.

Mr. Mello made a motion that the vouchers be approved as presented in the materials sent to the Board. The motion was seconded and passed unanimously.

IV. EXECUTIVE SESSION

Mr. Roberts moved the Board into Executive Session at 8:51 a.m. to discuss litigation. He estimated that the Executive Session would take approximately 10 minutes.

(Christie True and Eric Parks arrived to join the Board.)

Mr. Roberts called the Board back into regular session at 8:59 a.m.

V. PUBLIC HEARINGS

V.A. Resolution No. 1308 – Amending Regulations - State Environmental Policy Act (SEPA) (Regulation I, Article 2)

Jennifer Dold said the proposal as presented in Resolution No. 1308 involves technical amendments to the agency's regulations. She said the agency's State Environmental Policy Act (SEPA) regulations incorporate by reference many of the state Department of Ecology's regulations implementing SEPA. She said the combined regulation structure (agency and state) reflects the agency's policy direction to use Ecology regulations to the extent possible. She said in April, Ecology revised its SEPA regulations and to ensure consistency between the two sets of regulations, agency staff proposes to amend and update the effective date reference in the agency's SEPA rules.

Ms. Dold said the agency received one general comment that was not specific to this proposal and asked why a hearing for the agency's regulation changes could not be held in Tacoma. She said the comment was included in the Board packet. She said staff does not recommend any changes to the proposed amendments based on this comment and will respond to the commenter that the comment was shared with the Board.

Mr. Roberts opened the public hearing and noted that no members of the public were present. He acknowledged the e-mail comment received and closed the public hearing.

There was no Board discussion.

Mr. Mello made a motion that Resolution No. 1308 be approved as presented in the materials sent to the Board. The motion was seconded and passed unanimously.

V.B. Resolution No. 1309 – Amending Regulations - Civil Penalties (Regulation I, Section 3.11) and Federal Regulation Reference Date (Regulation I, Section 3.25)*

Steve Van Slyke said the proposal presented in Resolution No. 1309 involves technical amendments to the agency's regulations with respect to the maximum civil penalty and the federal regulation reference date.

Mr. Van Slyke said the agency typically adjusts the maximum civil penalty amount in response to inflation to keep the penalty amount relevant to the current value of money. He said the proposed amendment involves an increase of $256, based on a 1.5% increase in the CPI for the Seattle/Tacoma/Bremerton area for the 2013 calendar year. He said the proposed amendment would lead to a maximum allowed civil penalty of $17,781 per day for each violation. He said actual penalty amounts are assessed in accordance with the penalty worksheets and policies approved separately by the Board and are typically much less than the maximum level.

Mr. Van Slyke noted that this amount is different than the amount included in the briefing to the Board in July. He said in reviewing rulemaking documents, it was discovered that the initial CPI adjustment incorrectly compared October to October values; however, the calendar year adjustment is based on the December to December values. He said the background documents and proposed rule amendment were corrected prior to being sent to the Code Reviser. He said the correct amounts were also included in the public notice version of the proposal and the documents in the September Board packet.

Mr. Van Slyke said the federal regulation reference date makes it clear which version of federal rules are in effect. He said the proposal includes a new effective date of July 1, 2014, which corresponds to the annually updated publication date of the Code of Federal Regulations in paper form.

Mr. Van Slyke said the agency received the same general comment for both resolutions; the comment was not specific to this regulatory change and asked why a hearing for the agency's regulation changes could not be held in Tacoma. He said the comment was included in the Board packet. He said staff does not recommend any changes to the proposed amendments based on this comment and will respond to the commenter that the comment was shared with the Board.

Mr. Roberts opened the public hearing and noted that no members of the public were present at the meeting. He again acknowledged the e-mail comment received and closed the public hearing.

There was no Board discussion.

Mr. Mello made a motion that Resolution No. 1309 be approved as presented in the materials sent to the Board. The motion was seconded and passed unanimously.

VI. UNFINISHED BUSINESS

VI.A. Executive Director's Final FY15 Goals

Mr. Kenworthy said his first FY15 priority is securing $2 million in new wood stove removal/replacement funding. He said he is optimistic we will be able to convince the

Legislature to provide the funding. He said his next priority is securing key partnerships in Pierce County for burn ban enforcement for this winter.

Mr. Kenworthy said under state law, we need to periodically evaluate if there are reasonable alternatives to outdoor burning in our four counties. He said he recommends approaching all four counties at once, rather than just focusing on a couple of counties. He said he will meet with leadership in the counties to discuss this issue.

Mr. Kenworthy said another priority is work on a clean fuel standard and there may be a serious effort to block this in the legislature. He said he is meeting with Governor Inslee tomorrow on this issue. He said a clean fuel standard is a significant public health and climate change tool and it is important that the agency leads on this issue.

Mr. Kenworthy said an important environmental justice goal for the agency is to establish substantial new relationships with a diverse group of community leaders. He said we are moving towards being more outcome-driven once partnerships are established.

Mr. Kenworthy said hiring an exceptional new Human Resources Manager is critical. He said it is important that the new person spend enough time with staff that they get a deep understanding of what staff is doing.

Mr. Kenworthy said he will conduct follow-up on the per capita rate to our jurisdictions with particular emphasis on communities he didn't have a chance to visit before. He will work to ensure jurisdictions understand the significant value the agency brings to the region and support appropriate funding for the agency through its per capita rate.

Mr. Mello said he thinks Mr. Kenworthy has outlined a robust and meaningful work plan and appreciates the work put into it. He said he would like a clearer sense of what success looks like for the environmental justice work. He said he understands that it is still a work in progress, but would like something more concrete in Goal 5 for what success looks like at the end of the year.

Mr. Kenworthy said in a few months we will come back and discuss with the Board the work we are doing in communities. He said we are applying for a grant to work on a small, local monitoring project for Allentown and Tukwila.

Jill Simmons said there are two environmental justice outcomes, one on the ground, and one on the process of engaging people – about communities being involved. She said one path is bringing the science; the other is how we bring the science so the community understands the issues and is engaged.

Stella Chao said she would like to see institutional metrics, i.e., how we incorporate environmental justice into all aspects of staff work. She said the outcome is not just out there in communities, but also overlaid internally into everything agency staff does.

Mr. Kenworthy said we have been discussing how to include environmental justice into the formal rule-making process. He said we are also looking at our grants to determine if we are serving a broad swath of the public or only small group.

Ms. Chao said agency work seems to be geographically oriented. She asked Mr. Kenworthy about working with populations more demographically across regional boundaries.

Mr. Kenworthy said as we talk about environmental justice work, analysis regarding vulnerable communities and a more demographic approach to our work is definitely a possibility.

Ryan Dicks said the agency should lead on the clean fuels standard. He said we should create a one-page handout on health effects before the legislative session. He said if we have one success in Olympia, this should be the one.

Mr. Kenworthy said that while we are working with some allies on this, some groups are cautious in discussing strategies because any documents we receive become a public record.

Mr. Dicks said jurisdictions can become leaders on this issue and could receive funding for local clean fuel projects. He said the agency needs to inform jurisdictions about the possible benefits of supporting clean fuel standards.

Mr. Kenworthy said there is a group working towards a carbon tax and the clean fuels standard could be affected by its work. He agreed with Mr. Dicks that the agency should play a leading role in the conversation.

Mr. Mello said Mr. Kenworthy's goal is listed as, "The legislature does not block the potential creation of a clean fuels standard." Mr. Mello said instead, the goal should be a great rule and policy from Governor Inslee's office and the Legislature.

Mr. Roberts said he signed on to a letter to Governor Inslee supporting a clean fuels standard. He said logically, a carbon tax would be better from an economic standpoint. He said if we are serious about removing our carbon footprint from transportation, this discussion should be about getting a more robust public transportation system as a first priority.

Ms. Chao said when public transportation decisions are made about who gets access, the agency could lead on making sure an environmental justice lens is applied to those decisions.

Mr. Kenworthy said Goal 2.1 of the Strategic Plan is to engage in PSRC decisions. He said that will happen more in the next couple of years. He said there is going to be a conversation about how public transportation systems will be used, how they can be more efficient, how they will be funded, and the best clean air choices.

Mr. Roberts said the reasonable alternatives to outdoor burning issue needs to be covered in a way that includes reaching out to fire districts.

There was no further Board discussion.

VI.B. Briefing – Executive Director/ Management Position Salary Survey

Laurie Halvorson said during Craig Kenworthy's FY14 performance evaluation, the Board expressed an interest in conducting a salary survey for the Executive Director position, and perhaps other management positions.

Ms. Halvorson said the last salary survey for the Executive Director position was done in 2006. She said a more recent management salary survey was conducted in 2010, which encompassed all management positions except the Executive Director position. She said the list of organizations included in the surveys was included in the Board memo. She asked for direction from the Board about how they would like to proceed.

Christie True said it would be good to survey for both the Executive Director and all the management positions because that will be more efficient. She said equivalency is important; and the City of Seattle Public Utilities isn't a good comparable because it is too big, although comparables could perhaps be found within departments. She said it is fine to look outside of the region because we can adjust for the difference in regional cost of living.

Ms. Chao said there have been a lot of ups and downs in the economy the last few years and this would be a good time for another full survey.

Eric Parks asked how many managers there are.

Ms. Halvorson said there are ten managers (including the open Human Resources Manager position) plus three supervising inspectors.

Mr. Roberts said he is fine with the organizations used as comparables in the previous surveys. He said he is hearing that there is Board agreement that now is a good time for a new survey.

Mr. Kenworthy said some other air agencies are not an exact equivalency since some are bigger and some are smaller.

Ms. Halvorson said staff will get back to the Board with results once a new survey is complete.

VI.C. Strategic Plan Update – Objective 1.5 Characterize and Communicate Air Quality

Andrew Green said it is important that the Board see the body of work coming from the strategic plan. He said we are going to try a mechanism of periodic updates by Objective, and monthly updates covering what we've done, challenges experienced, and our successes. He said Objective 1.5 is the focus of the first briefing.

Kathy Strange said we will provide an update on recent progress, the FY15 deliverables for Objective 1.5, challenges, and input received from the Advisory Council.

Ms. Strange said one tool used to meet the first part of Objective 1.5 ("Employ a variety of tools to characterize and improve our understanding of air pollution, its sources, and impacts across

our four counties") is a monitoring network of 13 monitors that measure and report emissions across the region. She said staff has recently completed a monitoring network review and relocated the Duwamish site, discontinued the Olive Street site, and established particulate matter (PM) monitoring at a near-road site in the Seattle International District. She said staff completed a "Bike-to-work month" monitoring project, where agency staff carried portable monitoring equipment with them on their daily bike commute to and from the office. She said the purpose of the project was to test various portable monitoring devices (particle or black carbon counters combined with GPS) and to get some high-level data on pollution levels during peak commute times along various urban transportation corridors within Seattle.

Ms. Strange said other tools include the completed Pierce County winter monitoring study, maps created to identify 'highly impacted communities', testing inexpensive emerging technologies to monitor air quality, and designing and implementing an ozone "mini-study".

Ms. Strange said we are currently scoping a proposal for an EPA community monitoring grant application to see how communities can use monitoring to drive communities' decision making. She said there is also a study just concluded in the International District where we deployed seven monitors that are newer and smaller than our usual monitors and were mounted on utility poles. She said staff worked on this with the City of Seattle and the project also included a mobile component. She said the monitors were just removed this week and staff is analyzing the results now.

Ms. Chao said this is a good opportunity to engage with communities on bike-to-work campaigns and community monitoring.

Mr. Roberts asked whether there is a significant challenge over changing data points when we move a monitor.

Ms. Strange said ideally, when monitoring sites are changed, there is an overlap of data at the old and new sites to see how well they correlate. She said in cases where this is not possible, monitor codes are changed so the reports show when the data points changed.

Ms. Strange said the FY15 deliverables for the first part of Objective 1.5 are:

- Continue PM2.5 network; assess performance of new instruments
- Conduct/begin emissions transportation inventory
- Potentially start ozone modeling
- Continue refinement of GIS mapping equity tools (used to help screen highly impacted communities)
- Complete Seattle International District Chinatown "near-roadway" study – analysis and results communication
- Design and implement wintertime wood smoke studies
- Submit community monitoring proposal to EPA

Ms. Strange said the second part of Objective 1.5 is to share and communicate air quality information. She said building and leveraging partnerships is part of that so we will talk about these together.

Ms. Strange said some of the progress includes staff attending community meetings in South Park (Duwamish), and creating pollution maps based on the Bike-to-Work project and posting them on local bike blogs. She said staff also conducted the International District study, including talking with school districts about possible good monitoring sites. She said we plan to continue to reach out to the International District much more in the future.

Ms. Strange said Allentown has many heavy wood users and staff is talking to the community through the school district, which is the most diverse in the country – there are 80 different languages spoken there. She said the best way to get information out to the community was through the science class and club at school and then kids bring information home. She said we have applied for a grant to continue this work.

Ms. Strange said the FY15 communication and partnership deliverables under Objective 1.5 are:

- Continue air quality forecasts
- Duwamish River Cleanup Coalition grant participation
- Update forecasting/air quality tools
- Build relationships with STAR grant community; Seattle Chinatown International District
- Continue to engage in technical arenas
- Reach out to new partners

Ms. Strange said there are some inherent challenges with new monitoring technology, including less control over the monitoring environment, more risk to the equipment, and communicating what the data means because the readings are different with new equipment.

Ms. Strange said the Advisory Council is supportive of the reporting format and regular strategic plan updates, as well as supporting the scope and content of the projects themselves. She said Advisory Council members were particular supportive of the "highly impacted community" thread and offered good suggestions on possible partnerships and community projects.

Ms. Strange said some of the questions for the Board are whether they have ideas on how to engage, and/or have leads and contacts in communities in their jurisdictions. She said we are seeking input on how staff can communicate health risks and what types of messages might resonate in their jurisdictions. She said we will conduct resource discussions and request guidance as projects move forward or become available.

Mr. Mello said he was available to speak with staff offline if it needs help with contacting specific communities in his jurisdiction.

Mr. Dicks asked whether the agency ever conducts general air quality communications, for example, here are the top 5 things you can do at home to improve air quality.

Mr. Kenworthy said in the early 2000's, the agency conducted a more general outreach component and it wasn't that effective. He said more targeted outreach has been more successful.

Joanne Todd said the agency is doing some general outreach on social media.

There was no further Board discussion.

VII. NEW BUSINESS

VII.A. Resolution No. 1307 – Adding Three Positions to Advisory Council Representing Suburban Cities

Mr. Kenworthy said as discussed at previous meetings, there is a desire to add additional positions to the Advisory Council to represent cities not represented on the Board. He said the Advisory Council currently has one position designated for suburban cities representation and it is vacant.

Mr. Kenworthy said at the July Board meeting, the Board agreed with the recommendation to add three additional positions to the Advisory Council for representation of other cities not represented on the Board. He said this would result in one other cities position for each of the four counties, for a total of four suburban cities positions.

Mr. Kenworthy said we are having conversations with Sound Cities Association (King County) and city associations in the other counties as well on the assumption that the Board would like to proceed with creating positions.

Ms. Chao asked if the King County representative would be someone from the Sound Cities Association.

Mr. Kenworthy said yes. He said that although the City of Bellevue is not a member of the Sound Cities Association (SCA), SCA seeks Bellevue's input before putting a candidate forward for the Board's consideration and does sometimes nominate candidates from Bellevue as part of its processes.

There was no further Board discussion.

Ms. True made a motion that Resolution No. 1307 be approved as presented in the materials sent to the Board. The motion was seconded and passed unanimously.

VII.B. Resolution No. 1310 – FY15 Budget Amendment Adding Applications Developer (Term Position)

Mr. Kenworthy said when the FY15 budget was approved some potential expenditures were set aside in the event that they might be able to be added to the budget at a later time. He said the applications developer work was one of the items that had been set aside.

Karen Houser said $219,898 in savings in the FY15 budget has been identified from three sources: open positions that will either be filled later in the fiscal year or were vacated and are

being backfilled internally; lower-than-budgeted Public Employees Retirement System employer rate; ; and higher final FY14 discretionary fund balances.

Ms. Houser said two items are recommended to be added to the FY15 budget: a one-year term .Net Developer/Computer System Analyst position, to provide support for the Air Quality Programs Division and FY15 strategic plan deliverables for Objectives 1.3 and 1.5; and support for King County's geographic-based 2013 greenhouse gas (GHG) emissions inventory. She said this project will build on previous 2003 and 2008 inventories, and directly support the county's Strategic Climate Action Plan and the agency's Strategic Plan Objective 2.1.

Mr. Kenworthy said these additions assist with the strategic plan and increase our capacity to do more transportation emissions work. He said we eventually want to talk to other jurisdictions about emissions inventory work however, since King County already has an emissions inventory project in process, we want to move ahead with this budget item.

Ms. Simmons said the City of Seattle has completed three emissions inventories for Seattle. She asked about the desired learning from participating in this inventory.

Ms. Strange said we are not far enough along yet to know which areas of opportunity to target, but are looking at climate and air quality goals. She said the emissions inventory work is valuable in terms greenhouse gases (GHGs), health, volatile organic compounds (VOCs), nitrogen oxide (NOx), ozone, etc.

Ms. Simmons said she thinks this will provide a benefit to whole region.

There was no further Board discussion.

Mr. Mello made a motion that Resolution No. 1310 be approved as presented in the materials sent to the Board. The motion was seconded and passed unanimously.

VII.C. Briefing – Reasonable Alternatives to Outdoor Burning [RCW 70.94.745(6)]

Ms. Todd briefed the Board on this effort. She said under state law, as of December 31, 2000, and at least every third year after that, each local air authority must determine whether any areas within their jurisdiction have a reasonable alternative to burning. She said the last time the Board discussed this issue was 2009.

Ms. Todd said by law, a reasonable alternative exists if the answer to these two questions is "yes":

- Is the area served by available and economical recycling (or composting) pick up or any other method for disposing of material (private chipper, incineration facility or solid waste drop box, transfer station or landfill) located within a reasonable distance and that accepts the type of waste at a cost less than or equal to the median of all county tipping fees in the state?
- Is any reasonably economical alternative less harmful to the environment than outdoor burning (e.g., waste reduction, recycling, energy recovery or incineration, landfill disposal) available?

Mr. Kenworthy said the Board's decision is largely based on what is a reasonable distance and time for travel.

Ms. Todd said in 2008, the Board voted to prohibit land-clearing burning in Pierce, King and Snohomish counties, and in 2009 it voted to prohibit land-clearing burning in Kitsap County. She said now it is time for the Board to review reasonable and economical alternatives to residential burning in the four-county jurisdiction.

Ms. Todd presented two proposed timelines for the review process, one with a more compressed schedule and one with a longer time frame

Mr. Kenworthy said staff is assuming a whole-jurisdiction approach will be taken, as was done the previous time this effort was conducted.

Ms. True said she would like data provided to the Board as soon as possible. She said, for example, alternatives might be available now; however, if the amount of material dropped off increases exponentially, those available resources could be overwhelmed. She also raised the question of considering not just what capacity is available now, but what should be available and whether counties should be providing more of these services.

Mr. Dicks asked whether the Board could conclude there are reasonable alternative available in only 3 out of 4 counties. He said he thinks it would probably take one full meeting just to decide whether reasonable alternatives are available just for Pierce County.

Larry Willman said instead of starting outreach to just small areas, we should throw out a wider net.

Mr. Kenworthy said he thinks we need to strive for all four counties at once. He said we are currently reaching out to other electeds to ensure they are not surprised by this issue coming up. He said we will brief the Board on our technical analysis and broader outreach plan at the January meeting.

Mr. Roberts said he thought counties have a good understanding of their capacity to handle recycling.

Mr. Kenworthy said there are also private receiving facilities and staff will gather information from them.

Ms. True said counties know what their capacity is now, but there are questions around how long it would take to get additional capacity in place, the costs, and whether implementation of the regulation could be phased in.

Ms. Chao said in planning our outreach, because of the sensitivity of this issue, public meetings should be held in various locations in all four counties. She said we should not just expect people to come here to us.

Mr. Kenworthy said we will have multiple meetings in each county.

Mr. Roberts noted that we are running slightly over on time for the next agenda items and suggested we should move on to the next item.

Mr. Kenworthy said he recommended moving the report on FY14 financial performance to the October meeting.

Mr. Roberts concurred and there was no further Board discussion.

VII.D. Briefing – Compliance Strategic Project - Stage 2 Vapor Recovery Systems

Sara Harrold said a new ozone standard will be proposed later in 2014 and that is motivator for a compliance strategic project related to Stage 2 vapor recovery systems at gas stations. She said the focus of the project is to quantify how volatile organic compounds (VOCs), benzene and other toxic organic emissions would change if the agency eliminated the requirement for Stage 2 vapor recovery control systems; and to create a foundation for supporting maintenance or removal of the current Stage 2 requirements. She said these compounds are an immediate area health issue and also contribute to ozone formation in the summer.

Ms. Harrold said Stage 2 vapor recovery technology is a system of nozzles and hoses designed to control emissions of toxic air pollutants and ozone precursors when putting gasoline in vehicles. She said Stage 2 vapor recovery technology was first installed in this area in the early 1990s to reduce ozone precursor emissions. She said now most vehicles have onboard refueling vapor recovery (ORVR) systems that collect vapors. She said the Stage 2 technology and ORVR systems both do the same thing – reduce ozone and benzene precursors. She said the biggest difference is that Stage 2 systems can control gasoline spillage while ORVR systems cannot.

Ms. Harrold said in some cases ORVR and Stage 2 are incompatible and using both can actually cause an increase in vapor emissions. She said this incompatibility becomes more significant as newer ORVR-equipped vehicles replace older vehicles. She said in 2012, the EPA decided that 70% of cars in use now have ORVR systems and it told states that they can decide whether they want to remove the Stage 2 requirement for gas stations.

Ms. Harrold said our question is if Stage 2 requirements for gas stations are removed, how would that affect air quality in region?

Ms. Harrold said EPA issued a guidance document describing how to calculate the change in emissions if Stage 2 vapor recovery systems are removed. She said the EPA method considers vehicle tank emissions with Stage 2 and with ORVR, incompatibility, and does not consider spillage. She said the agency also developed its own calculation method that considers all the emissions/emission controls from both Stage 2 and ORVR, uses a gas station emissions inventory approach, and includes spillage.

Ms. Harrold said based on the calculations using the agency's method, ozone emissions are lower with Stage 2 in place until at least 2023 and possibly beyond 2030. She said the date range difference is largely related to the difference between the EPA and the agency results and driven by spillage. She said there is uncertainty in this data because the result depends on uncertain and poor-quality emission information.

Ms. Harrold said benzene emissions will always be lower with Stage 2 in place because Stage 2 nozzles control gasoline spillage and ORVR does not. She said evaporation from spillage releases more benzene than other aspects of refueling.

Ms. Harrold said some questions to consider with regard to keeping or removing the Stage 2 vapor recovery systems are:

- Would we address the emissions that occur as a result of decommissioning?
- What is the cost per ton of VOC removed for Stage 2 systems?
- If Stage 2 requirements are removed at some point, would new stations being constructed before the deadline have to install it?
- What hardware would replace the Stage 2 systems?

Mr. Kenworthy said gas stations argue that ORVR is enough and EPA has decided to leave the decision with the states. He said there is good reason to keep discussing this issue and not hurry to remove Stage 2 requirements. He said this still needs to be studied more in terms of ozone nonattainment risk.

Ms. Halvorson said the agency is receiving questions about its position on discontinuing Stage 2 vapor recovery programs, and the fact sheet that was distributed describes the agency's position.

There was no Board discussion.

Ms. Simmons, Mr. Dicks and Mr. Mello left the meeting.

VII.F. Board Training – Open Government Trainings Act (RCW 42.30.205 & RCW 42.56.150)

Ms. Dold briefed the Board on training being provided at the meeting to comply with the Open Government Trainings Act.

Ms. Dold played a video for the Board from the Washington Attorney General's Office on the state Open Public Meetings Act.

Ms. Dold played a second video for the Board from the Washington Attorney General's Office on the state Public Records Act.

Ms. Dold then gave a PowerPoint presentation on records retention requirements based upon training materials posted on the Washington State Archives website.

Ms. Chao said as the Public-at-Large Board member, she doesn't really have agency records. She asked if her retention of records would be separate from the agency where she works.

Ms. Dold said yes.

Mr. Roberts said it is best, if possible, to keep your personal computer free of all Board-related materials. If not, it is very important to keep a separate file in your personal computer system where everything you have received related to Board business that must be retained is kept.

Ms. Dold said as long as Board members keep all e-mails in a single agency-related file and can verify that is the only place those materials would be, that would be a reasonable risk reduction technique.

VIII. STAFF REPORTS

Mr. Roberts noted there was a lot of information in the Director's Report this month. He said he was particularly interested to see the progress on the diesel emissions buyback program (ScRAPS).

There was no further Board discussion.

With no further business, the Board adjourned at 12:46 p.m.

I hereby certify this to be a true and correct record of the Minutes of the September 25, 2014, meeting of the Board of Directors of the Puget Sound Clean Air Agency.

Attest:

Craig T. Kenworthy Executive Director	Paul Roberts Chair, Board of Directors

jwc

pscleanair.org
Puget Sound Clean Air Agency

MEMO

Date: October 16, 2014

To: Board of Directors
Puget Sound Clean Air Agency

Subject: Vouchers Submitted for Approval

Honorable Members:

The following vouchers were issued in the Blanket Voucher Approval document dated September 19, 2014:
Vouchers 13118 through 13154 in the amount of $183,636.99 for Operating Expenses.

The following vouchers were issued in the Blanket Voucher Approval document dated September 25, 2014:
Vouchers 13155 through 13192 in the amount of $197,673.30 for Operating Expenses.

The following vouchers were issued in the Blanket Voucher Approval document dated October 10, 2014:
Vouchers 13193 through 13264 in the amount of $248,760.94 for Operating Expenses.

Copies of the above listed vouchers are attached for your review. We request that the Board review the vouchers listed above and approve such vouchers as submitted.

Respectfully submitted,

Craig T. Kenworthy
Executive Director

Attachment

jwc

BLANKET VOUCHER APPROVAL DOCUMENT

Governmental Unit Name: PUGET SOUND CLEAN AIR AGENCY Fund #01-000-185-0

Auditing Officer Certification (if Board approves via meeting minutes):

I, the undersigned, do hereby certify under penalty of perjury that the materials have been furnished, the services rendered or the labor performed as described herein and that the claim is a just, due and unpaid obligations against the above-named governmental unit, and that I am authorized to authenticate and certify to said claim.

Signature	Title	Date
	DIRECTOR, AQ PROGRAMS	9/19/2014

9.19.14

This certification and approval covers Warrant Number 13118 through 13154 in the amount of $183,636.99 per the attached list.

BUC010-1-D1 (King County)

Puget Sound Clean Air Agency (Current)
Check/Voucher Register - AP Check Register
From 9/19/2014 Through 9/19/2014

Effective Date	Warrant Nu...	Vendor Name	Transaction Description	Check Amount	Spoiled
9/19/2014	13118	A and A Woodstove Inc	R0893 Wood Stove Replacement L Palmer	4,373.03	No
9/19/2014	13119	Absolute Chimney	B0179 Wood Stove Replacement D Levens	250.00	No
9/19/2014	13120	Access Information Management	Agency Archives - Storage & Retrieval July 2014	1,463.40	No
9/19/2014	13120	Access Information Management	Storage & Retrieval - agency media July 2014	200.50	No
9/19/2014	13121	Apex Legal Services	vs. ABD Properties LLC D950	45.00	No
9/19/2014	13121	Apex Legal Services	vs. Stephen &/or Cinda Baldwin D450	45.00	No
9/19/2014	13122	Argus Pacific Inc	Asbestos Supervisor Refresher - Birnbaum/Cole	450.00	No
9/19/2014	13123	Martin Babare	A0541 Recycle Buy Back M Babare	350.00	No
9/19/2014	13124	Business Card BofA	Annual Card Fee	25.00	No
9/19/2014	13124	Business Card BofA	Community Based Social Marketing - McGurn D500	1,161.00	No
9/19/2014	13124	Business Card BofA	ConstantContact - email service	213.53	No
9/19/2014	13124	Business Card BofA	Epidemiology Conference-D400 StrangeHarroldSwartzendruberSag	1,775.00	No
9/19/2014	13124	Business Card BofA	InStyle Furniture - refurbished task chairs	1,118.00	No
9/19/2014	13124	Business Card BofA	Language Line - translation services (telephone)	23.70	No
9/19/2014	13124	Business Card BofA	ORCA - WSF passes Sep 2014	803.20	No
9/19/2014	13124	Business Card BofA	ZipCar use - Aug/Sep 2014	527.45	No
9/19/2014	13124	Business Card BofA	ZipCar use EJ Aug/Sep 2014	174.93	No
9/19/2014	13125	Robert Booher	parking @ ferry terminal 8/13 through 9/11/14	42.00	No
9/19/2014	13126	Cal Brodie	A0507 Recycle Buy Back C Brodie	350.00	No
9/19/2014	13127	CENTURYLINK	206-343-8800 8/8-9/5/14	128.99	No
9/19/2014	13128	Charles Cox	A0536 Recycle Buy Back C Cox	350.00	No
9/19/2014	13129	Cummins Northwest Inc	Central Kitsap Fire District Unit #M-41	7,194.15	No
9/19/2014	13129	Cummins Northwest Inc	South Pierce Fire District Unit # E05-1	30,879.00	No
9/19/2014	13130	DELL MARKETING L.P.	Latitude E7440	7,766.52	No
9/19/2014	13131	Down Right Cozy Inc	R0884 Wood Stove Replacement J Goodin	3,600.00	No
9/19/2014	13132	Dynamic Language Center	Translation to Korean	126.20	No
9/19/2014	13133	Marvin Elza	A0530 Recycle Buy Back M Elza	350.00	No
9/19/2014	13134	Enterprise Car Rental	vehicle rental - 9/4/14 R Hess	39.69	No
9/19/2014	13135	Marja Florence	A0529 Recycle Buy Back M Florence	350.00	No
9/19/2014	13136	Integra Telecom	dedicated internet service 9/8-10/7/14	515.91	No
9/19/2014	13137	Helen Irwin	A0534 Recycle Buy Back H Irwin	350.00	No
9/19/2014	13138	Istate Truck Center Inc	Freightliner 2008	20,000.00	No
9/19/2014	13139	Jackson Lewis LLP	Professional Services - July 2014	2,955.00	No
9/19/2014	13140	Kitsap Sun	Board Meeting Notice 8/25/2014	105.38	No
9/19/2014	13141	David Levens	B0179 Recycle Buy Back D Levens	200.00	No
9/19/2014	13142	NVL Laboratories Inc	Bulk Asbestos Analysis 201408090	70.00	No
9/19/2014	13143	Omnitek Engineering Corp	Emission testing documentation	10,000.00	No
9/19/2014	13144	Pitney Bowes Inc	ink cartridge for postage machine	126.34	No
9/19/2014	13145	Richard Roy	A0539 Recycle Buy Back R Roy	350.00	No
9/19/2014	13146	Sandau, Gregory	tail light bulb - Vehicle 31375	5.46	No

Puget Sound Clean Air Agency (Current)
Check/Voucher Register - AP Check Register
From 9/19/2014 Through 9/19/2014

Effective Date	Warrant Nu...	Vendor Name	Transaction Description	Check Amount	Spoiled
9/19/2014	13147	Ezra Stippich	A0522 Recycle Buy Back E Stippich	350.00	No
9/19/2014	13148	TEC Equipment Inc	Volvo 2012	40,000.00	No
9/19/2014	13149	TEC Equipment Inc	Kenworth 2010	20,000.00	No
9/19/2014	13149	TEC Equipment Inc	Kenworth 2010 T660	20,000.00	No
9/19/2014	13150	TERRA Services Inc	9/7/14 Gregory Fisher	336.97	No
9/19/2014	13151	US Bank Equipment Finance	Sharp copiers 8/30-9/30/14	2,242.58	No
9/19/2014	13152	Verizon Wireless	agency cell phones - 8/8-9/7/14 771873428-00001	1,584.89	No
9/19/2014	13153	State of Washington Consolidated Tec...	WEBEX conference calls August 2014	40.60	No
9/19/2014	13154	Department of Enterprise Services (DE...	#10 Standard Window Envelopes	166.42	No
9/19/2014	13154	Department of Enterprise Services (DE...	Outreach Materials - storage & fulfillment August 2014	62.15	No
Report Total				183,636.99	

9.19.14

BLANKET VOUCHER APPROVAL DOCUMENT

Governmental Unit Name: PUGET SOUND CLEAN AIR AGENCY

Fund #01-000-185-0

Auditing Officer Certification (if Board approves via meeting minutes):

I, the undersigned, do hereby certify under penalty of perjury that the materials have been furnished, the services rendered or the labor performed as described herein and that the claim is a just, due and unpaid obligations against the above-named governmental unit, and that I am authorized to authenticate and certify to said claim.

Signature	Title	Date
	DIRECTOR, AQ PROGRAMS	9/25/2014

9.24.14

This certification and approval covers Warrant Number 13155 through 13192 in the amount of $197,673.30 per the attached list.

BUC010-1-D1 (King County)

Puget Sound Clean Air Agency (Current)
Check/Voucher Register - AP Check Register
From 9/25/2014 Through 9/25/2014

Effective Date	Warrant Nu...	Vendor Name	Transaction Description	Check Amount	Spoiled
9/25/2014	13155	Access Information Management	Agency archives - storage & retrieval September 2014	1,112.75	No
9/25/2014	13156	AFLAC	Aflac Employee Deductions	17.50	No
9/25/2014	13157	Altech Environment USA Corporation	Cairsens Co USB Sensors	5,235.00	No
9/25/2014	13158	Automatic Data Processing Inc	Autopay II period ending 9/15/14	271.56	No
9/25/2014	13158	Automatic Data Processing Inc	Autopay II report package 9/11/14-HR/B p/e 8/25/14	1,027.67	No
9/25/2014	13159	John Backus	A0531 Recycle Buy Back J Backus	350.00	No
9/25/2014	13159	John Backus	A0532 Recycle Buy Back J Backus	350.00	No
9/25/2014	13160	Capitol Solutions LLC	Governmental Relation Services - September 2014	3,000.00	No
9/25/2014	13161	Carlos Castiblanco	WWCC Website Design & Development - August 2014	1,280.00	No
9/25/2014	13162	Clise Agency, Inc	October 2014 Rent - 4K Storage D425RM	905.00	No
9/25/2014	13162	Clise Agency, Inc	October 2014 Rent - Cost of Services Escal.	3,727.66	No
9/25/2014	13162	Clise Agency, Inc	October 2014 Rent - S13 Storage D500	233.00	No
9/25/2014	13162	Clise Agency, Inc	October 2014 Rent - S5 Storage D425 RM	176.00	No
9/25/2014	13162	Clise Agency, Inc	October 2014 Rent - Suite 105/107	41,800.00	No
9/25/2014	13163	Daily Journal of Commerce	RFP - Stakeholder Facilitation Services	96.60	No
9/25/2014	13164	Darrington School District	October 2014 Rent - Darrington monitoring site	100.00	No
9/25/2014	13165	Dynamic Language Center	translation from English to Korean	10.56	No
9/25/2014	13166	Enterprise Car Rental	vehicle rental - McGurn	241.59	No
9/25/2014	13166	Enterprise Car Rental	vehicle rental - R Hess	47.05	No
9/25/2014	13167	Federal Express Corporation	delivery service	21.53	No
9/25/2014	13168	General Services Administration	Oct 2014 Rent lease GS 10PR-OL-1402 WA0953KC	425.00	No
9/25/2014	13169	IMPERIAL PARKING INC	October 2014 Rent - Lot 2 4 stalls	1,497.00	No
9/25/2014	13170	Kliemann Brothers	R0711 Wood Stove Replacement H Hecker	1,500.00	No
9/25/2014	13171	Lincoln National Life Insurance Company	Lincoln Financial LTD	2,001.06	No
9/25/2014	13172	Madison Lake Forest Park LLC	October 2014 Rent - electricity @ Lake Forest Park site	50.00	No
9/25/2014	13173	Marysville School District No. 25	October 2014 Rent - Marysville site	250.00	No
9/25/2014	13174	Mercurio's Natural Gas Service Inc	R0911 Wood Stove Replacement E Bennett	1,500.00	No
9/25/2014	13175	NVL Laboratories Inc	bulk asbestos analysis 201408091 / 20140501949	80.00	No
9/25/2014	13176	Office Depot	binding combs / clips / staff calendars	42.13	No
9/25/2014	13176	Office Depot	binding combs/cd sleeves/ frames (HR)	298.18	No
9/25/2014	13176	Office Depot	laminating cartridge	90.33	No
9/25/2014	13176	Office Depot	paper plates for Clean Cities event	38.50	No
9/25/2014	13177	David Olander	A0538 Recycle Buy Back D Olander	350.00	No
9/25/2014	13178	Pacific Truck Centers	Freightliner 1009 Cascadia 0364	20,000.00	No
9/25/2014	13179	Praxair Distribution Inc	CO2 cylinders	21.40	No
9/25/2014	13180	Premiere Communications Inc.	agency 800 numbers 8/11-9/10/14	107.16	No
9/25/2014	13181	Puget Sound Energy (91269)	200019845169 Kent monitoring site	52.10	No
9/25/2014	13182	Puyallup Tribe, The	October 2014 Rent - Alexander site	75.00	No
9/25/2014	13183	SeaTac Trucks LLC	Freightliner 2009 Cascadia 9031	20,000.00	No
9/25/2014	13183	SeaTac Trucks LLC	Volvo 2009 5593	20,000.00	No
9/25/2014	13183	SeaTac Trucks LLC	Volvo 2009 5620	20,000.00	No

Puget Sound Clean Air Agency (Current)
Check/Voucher Register - AP Check Register
From 9/25/2014 Through 9/25/2014

Effective Date	Warrant Nu...	Vendor Name	Transaction Description	Check Amount	Spoiled
9/25/2014	13184	Sebris Busto James	Professional Services - August 2014	2,118.54	No
9/25/2014	13185	South Park Area Redevelopment Com...	October 2014 Rents - South Park monitoring site	50.00	No
9/25/2014	13186	Staples Business Advantage	agency calendars	501.60	No
9/25/2014	13187	TEC Equipment Inc	Volvo 2009 7766	20,000.00	No
9/25/2014	13187	TEC Equipment Inc	Volvo 2009 7774	20,000.00	No
9/25/2014	13188	Hev That	A0525 Recycle Buy Back H That	350.00	No
9/25/2014	13189	United Way of King County	United Way	1,038.00	No
9/25/2014	13190	Wallace's Incorporated	R0691 Wood Stove Replacement N Vulchev	3,400.00	No
9/25/2014	13191	Department of Enterprise Services (DE...	Gas Station mailing - certified	1,828.25	No
9/25/2014	13192	White-Crow, Judith	Air Quality Managers meetings refreshments	5.58	No
Report Total				197,673.30	

9.24.14

BLANKET VOUCHER APPROVAL DOCUMENT

Governmental Unit Name: PUGET SOUND CLEAN AIR AGENCY Fund #01-000-185-0

Auditing Officer Certification (if Board approves via meeting minutes):

I, the undersigned, do hereby certify under penalty of perjury that the materials have been furnished, the services rendered or the labor performed as described herein and that the claim is a just, due and unpaid obligations against the above-named governmental unit, and that I am authorized to authenticate and certify to said claim.

Signature	Title	Date
	DIRECTOR, AIR QUALITY PROGRAMS	10/10/2014

10.10.14

This certification and approval covers Warrant Number 13193 through 13264 in the amount of $248,760.94 per the attached list.

BUC010-1-D1 (King County)

Puget Sound Clean Air Agency (Current)
Check/Voucher Register - AP Check Register
From 10/10/2014 Through 10/10/2014

Effective Date	Warrant Nu...	Vendor Name	Transaction Description	Check Amount	Spoiled
10/10/2014	13193	A and A Woodstove Inc	R0860 Wood Stove Replacement J Phillips	3,400.00	No
10/10/2014	13193	A and A Woodstove Inc	R0877 Wood Stove Replacement M Klyshta	3,399.21	No
10/10/2014	13193	A and A Woodstove Inc	R0909 Wood Stove Replacement T Huppert	1,500.00	No
10/10/2014	13194	ABC Legal Messengers Incorporated	vs. Ardagh Glass D950	10.00	No
10/10/2014	13194	ABC Legal Messengers Incorporated	vs. Neil Nelson D950	100.00	No
10/10/2014	13195	Absolute Chimney	B0186 Wood Stove Replacement J Herbertson	150.00	No
10/10/2014	13195	Absolute Chimney	B0187 Wood Stove Replacement P Craft	150.00	No
10/10/2014	13195	Absolute Chimney	B0188 Wood Stove Replacement P Caviezel	250.00	No
10/10/2014	13195	Absolute Chimney	B0190 Wood Stove Replacement W Anderson	150.00	No
10/10/2014	13195	Absolute Chimney	B0191 Wood Stove Replacement M Danner	250.00	No
10/10/2014	13195	Absolute Chimney	Pick up/Drop off Free Standing Stove	400.00	No
10/10/2014	13196	Access Information Management	media storage - August 2014	202.00	No
10/10/2014	13197	Allegiance Benefit Plan Management	Allegiance FSA Employee Deductions	6,434.40	No
10/10/2014	13198	George Allison	TEC Equipment / SeaTac Truckers mileage Sep 2014	71.68	No
10/10/2014	13199	All Seasons Inc	R0869 Wood Stove Replacement M Steele	3,000.00	No
10/10/2014	13199	All Seasons Inc	R0873 Wood Stove Replacement K Williams	1,500.00	No
10/10/2014	13200	AlphaGraphics	#10 Window Envelopes / WSRP Mailing	1,335.28	No
10/10/2014	13200	AlphaGraphics	Maps / Airsafe Banner & Poster	333.37	No
10/10/2014	13201	William Anderson	B0190 Recycle Buy Back W Anderson	100.00	No
10/10/2014	13202	Apex Legal Services	vs. Frederick Contreras D950	45.00	No
10/10/2014	13202	Apex Legal Services	vs. Kenneth Wilson D950	45.00	No
10/10/2014	13202	Apex Legal Services	vs. Laurie Weaver D950	45.00	No
10/10/2014	13202	Apex Legal Services	vs. Mary Bradford D950	45.00	No
10/10/2014	13202	Apex Legal Services	vs. Melissa Hills D950	45.00	No
10/10/2014	13202	Apex Legal Services	vs. Richard Cavanaugh D950	45.00	No
10/10/2014	13203	Argus Pacific Inc	Asbestos Supervisor Refresher - Gribbon/Scarberry/Voegtlin	675.00	No
10/10/2014	13204	Building i	Professional Services project 20-3-913	5,805.00	No
10/10/2014	13205	Paul Caviezel	B0188 Recycle Buy Back P Caviezel	200.00	No
10/10/2014	13206	CenturyLink	206-223-5263 9/17-10/17/14	247.18	No
10/10/2014	13207	CenturyLink	206 T03-6766 9/23-10/23/14	425.19	No
10/10/2014	13208	CompuCom	Windows 8.1 Enterprise Upgrade	208.02	No
10/10/2014	13209	Peter Craft	B0187 Recycle Buy Back Incentive P Craft	200.00	No
10/10/2014	13210	Cummins Northwest Inc	Central Kitsap Fire Unit #M-56	7,194.15	No
10/10/2014	13210	Cummins Northwest Inc	Valley Regional Fire Unit #A-65 Battery Charger Replacement	1,240.64	No
10/10/2014	13211	Daily Journal of Commerce	Public Notice - LD Commodities 21429	189.00	No
10/10/2014	13212	Melody Danner	B0191 Recycle Buy Back M Danner	200.00	No
10/10/2014	13213	DELL MARKETING L.P.	Dell UltraSharp 24 inch Monitors w/warranty	1,896.04	No
10/10/2014	13214	Down Right Cozy Inc	R0883 Wood Stove Replacement L Powell	1,500.00	No
10/10/2014	13215	Robert Edmonds	A0537 Recycle Buy Back R Edmonds	350.00	No
10/10/2014	13215	Robert Edmonds	A0540 Recycle Buy Back R Edmonds	350.00	No

Puget Sound Clean Air Agency (Current)
Check/Voucher Register - AP Check Register
From 10/10/2014 Through 10/10/2014

Effective Date	Warrant Nu...	Vendor Name	Transaction Description	Check Amount	Spoiled
10/10/2014	13216	Enterprise Car Rental	Vehicle rental - R Hess	46.75	No
10/10/2014	13217	Federal Express Corporation	delivery services	37.22	No
10/10/2014	13218	Fircrest Hearth and Home	R0891 Wood Stove Replacement J Bish	1,500.00	No
10/10/2014	13219	Formula M Advertising LLC	30 Min Interview / Radio Promos / Radio Spots SEP 2014	390.00	No
10/10/2014	13220	Donald French	A0542 Recycle Buy Back D French	350.00	No
10/10/2014	13221	Guenther Media LLC	Videography & Photography Services AirSafe	18,166.77	No
10/10/2014	13222	Washington State Health Care Authority	PEBB Health Care Authority - Medical Dental Life LTD	85,055.99	No
10/10/2014	13223	John Herbertson	B0186 Recycle Buy Back J Herbertson	200.00	No
10/10/2014	13224	Robert Hoerner	A0544 Recycle Buy Back R Hoerner	350.00	No
10/10/2014	13225	Home Depot Credit Services	monitoring site supplies - stair risers, round up	120.01	No
10/10/2014	13226	King County Superior Court Clerk	Working Copies and Ex Parte Service Fees	55.00	No
10/10/2014	13227	King County Fleet Administration Divisi...	Maintenance - Vehicle 41376	67.78	No
10/10/2014	13228	Latino Education & Training Institute (...	Bothell Latino Family Health & Safety Fair 10/26/14	200.00	No
10/10/2014	13229	David Lindenmuth	A0545 Recycle Buy Back D Lindenmuth	350.00	No
10/10/2014	13230	Paul Lundeen	A0557 Recycle Buy Back P Lundeen	350.00	No
10/10/2014	13231	Magnum Print Solutions	HP LaserJet toner	288.94	No
10/10/2014	13232	Mallory Safety & Supply LLC	hand sanitizer / hard hat cap/ protective eyewear	95.83	No
10/10/2014	13233	Eugene C Matt - Matt & Associates	Professional Services - August 2014	750.00	No
10/10/2014	13234	Melissa McAfee	storage bins (D100)	49.10	No
10/10/2014	13235	Kit McGurn	Collaborations for a Cause Conference D500	230.72	No
10/10/2014	13236	Shawn Milender	A0524 Recycle Buy Back S Milender	350.00	No
10/10/2014	13237	Timothy Moody	A0546 Recycle Buy Back T Moody	350.00	No
10/10/2014	13238	Jon Nix	A0552 Recycle Buy Back J Nix	350.00	No
10/10/2014	13239	Office Depot	clasp envelopes	30.09	No
10/10/2014	13240	Office Depot Credit Plan	magnetic board / dry erase crayons	7.44	No
10/10/2014	13241	Ogawa & Company	NO2 NOx O3 Analysis	1,080.00	No
10/10/2014	13242	Pacific Rim Environmental Inc	Asbestos Bulk Sample Analysis 201408084	290.00	No
10/10/2014	13243	Pacific Truck Centers	Freightliner 2010 7370	20,000.00	No
10/10/2014	13244	Puyallup Heating & Air Conditioning	R0895 Wood Stove Replacement L Keough	6,850.00	No
10/10/2014	13245	Bill & Joanne Ralston	A0543 Recycle Buy Back Ralston	350.00	No
10/10/2014	13246	The Seattle Times	Board Meeting Notice 9/24/14	336.64	No
10/10/2014	13246	The Seattle Times	Legal Notice - LD Commodities LLC 21429	736.40	No
10/10/2014	13247	Seattle, City of - City Light	utilities @ Marginal Way 1-454443-509825	174.42	No
10/10/2014	13248	SeaTac Trucks LLC	Volvo 2009 5610	20,000.00	No
10/10/2014	13249	Sound Publishing Inc	Board Meeting Notice 9/24/14	61.60	No
10/10/2014	13250	Staples Business Advantage	folders / calendars / rubber bands	176.45	No
10/10/2014	13251	Sun Life of Financial	Sun Life Short Term Disability	302.61	No
10/10/2014	13252	Tacoma City Treasurer	vehicle maintenance	178.98	No
10/10/2014	13253	Tacoma, City Treasurer (Utilities)	utilities @ Alexander site 100229407	26.59	No
10/10/2014	13253	Tacoma, City Treasurer (Utilities)	utilities @ L Street site 100122818	65.11	No
10/10/2014	13254	Teamsters Local Union 763	Teamsters Union Dues	5,668.00	No

Puget Sound Clean Air Agency (Current)
Check/Voucher Register - AP Check Register
From 10/10/2014 Through 10/10/2014

Effective Date	Warrant Nu...	Vendor Name	Transaction Description	Check Amount	Spoiled
10/10/2014	13255	TEC Equipment Inc	2008 Volvo 6932	20,000.00	No
10/10/2014	13256	TERRA Services Inc	Ryan Bedard - WP 9/21/2014	462.84	No
10/10/2014	13256	TERRA Services Inc	Ryan Bedard-WP / Gregory Fisher-Recep 9/14/2014	1,090.10	No
10/10/2014	13257	Thomson Reuters - West	Federal Civil Judicial Proc/Rules Aug2014	39.42	No
10/10/2014	13257	Thomson Reuters - West	WA Court Rules State Federal Local	731.46	No
10/10/2014	13258	Verizon Wireless	broadband service 9/20-10/19/14 770200447-00001	129.05	No
10/10/2014	13259	Versoria Inc	Consulting Services - August 2014	2,167.20	No
10/10/2014	13260	Wallace's Incorporated	R0790 Wood Stove Replacement J Schreiner	1,500.00	No
10/10/2014	13260	Wallace's Incorporated	R0900 Wood Stove Replacement W Jackson	3,341.87	No
10/10/2014	13260	Wallace's Incorporated	R0905 Wood Stove Replacement D Miller	4,152.18	No
10/10/2014	13261	Washington Counties Insurance Fund	WCIF OCT 2014	2,586.94	No
10/10/2014	13262	Larry Willman	Board Member per diem - period ending 9/30/2014	100.00	No
10/10/2014	13263	YRCAA/NWOC	Opacity ReCertification - 5 inspectors D100	1,125.00	No
10/10/2014	13263	YRCAA/NWOC	Opacity ReCertification - 7 inspectors D100	1,575.00	No
10/10/2014	13264	Juan Zaldivar	mileage - Casa Latina outreach	35.28	No
Report Total				248,760.94	

10.10.14

pscleanair.org
Puget Sound Clean Air Agency

MEMO

Date: October 15, 2014

To: Board of Directors
Puget Sound Clean Air Agency

Subject: Briefing – General Regulatory Order No. 10606 – Reasonably Available Control Technology (RACT) Determination for Ardagh Glass, Inc.

Honorable Members:

This memorandum provides an update on the work in progress related to the proposed General Regulatory Order No. 10606. This proposed general regulatory order represents the Agency's recommendation for a Reasonably Available Control Technology determination for two glass melting furnaces at the Ardagh Glass, Inc. (AGI) plant in Seattle. The plant was formerly owned by Saint Gobain Containers, Inc. The RACT review work and proposed order result from the terms of an agreement between the owner and the Agency, reached in 2007, to address noncompliant excess emissions.

You will recall that the Agency staff briefed the Board in May on the review work that led to the proposal. The proposed order was published on July 1, 2014 for public comment and a public hearing on the proposal was held at the July 31, 2014 Board meeting. The original comment period was open through August 12, 2014. AGI requested the comment period be extended and the Agency agreed and extended the comment period through August 22, 2014.

At the July 31, 2014 hearing, comments were provided by a representative of the Duwamish River Cleanup Coalition and representatives for AGI. During the comment period, the Agency received nine comments from the public (including comments from the South Park Neighborhood Association). The Agency also received lengthy comments from AGI, submitted by their attorney, John Carroll.

Agency staff continues to prepare a response to the comments received and a recommendation to the Board for final action on the proposed order. While this work is ongoing, we can summarize some of the general themes presented in the comments received. The comments from the public and groups representing communities were supportive of the proposal that would require emission controls to reduce emissions from the plant.

The comments from AGI are wide ranging, but focus on several topics such as:

- The EPA Consent Decree with the company (signed in 2010) to resolve major new source review issues negates or eliminates the requirements in the 2007 Consent Decree agreed to with this Agency.
- The terms of the EPA Consent Decree represent Best Available Control Technology (BACT) and therefore, negate the RACT limits proposed by this Agency.
- Emission control technology cannot be considered "available" or technically feasible for use on a glass melting furnace unless it already is installed on a glass melting furnace (i.e. technology transfer is not an appropriate option).

- The available emission control technologies are not cost effective (i.e. reasonable).
- The cloud chamber scrubber system installed on the plant's No. 5 furnace has technical challenges that limit its availability for glass melting furnace applications.

A copy of the full comments is attached. The Agency is completing a thorough effort to consider and respond to all of the comments received, including how any final determination will resolve noncompliance emission issues for the plant, as identified in the 2007 Consent Decree. At this point, we anticipate our response to comments and final recommendation for action will be ready for consideration by the Board at the November or December meeting.

As a final note, immediately after this memo was prepared, the Agency received pleadings that AGI filed in federal court regarding the consent decrees. We will further brief the Board in Executive Session on this development.

Respectfully submitted,

Craig Kenworthy

Craig T. Kenworthy
Executive Director

Attachment

jwc

Steve Van Slyke

From: Adrienne Gateless <adriennegateless@outlook.com>
Sent: Wednesday, August 06, 2014 7:43 PM
To: Gerry Pade
Subject: Proposed Regulatory Order re: RACT Determination

Mr. Pade,

I am a new resident in Georgetown and would like to make a public comment regarding the proposed order. I was just made aware of the proposed order and problem re: Ardagh Glass. Was the public hearing recorded or taped? If so, could you provide the link?

Additionally, I would like to send you some feedback regarding the available documents on the matter. I know you are probably busy, but I hope you will read this feedback. To give you my background, I am attorney and read the documents expecting to understand most of the information.

I don't meant to offend you, the agency, or the people who put the information together. I only provide this feedback to help the agency relay information in a way that makes it approachable to a lay person, who has no technical or legal experience, and the very person your agency seeks comments from. As an attorney, I found the information on the documents to be jam packed with technical information that I could not understand. The gist of what I learned from the information was: (1) that there is an issue regarding toxic emissions from Ardagh Glass, (2) they were out of compliance in the past regarding the emissions and they agreed to make changes to get in compliance with regulations, and (3) the proposed order is made to get Ardagh Glass get into compliance with regulations. However, due to the technical information, I was unable to comprehend for myself how the proposed regulations should achieve the agency's goals.

My feedback probably comes too late in this comment period to make these changes. But I hope that you and your team may consider this in the future. I would love to discuss this more with you in the future. The work you do is important, but cannot fully be accomplished if the public cannot readily comprehend the information provided.

Thank you,
Adrienne Wat

Sent from Surface Pro

Steve Van Slyke

From: Jason Petrait <jpetrait@gmail.com>
Sent: Monday, August 11, 2014 9:50 AM
To: Gerry Pade
Subject: Comment on Ardagh Glass Inc

Dear Mr. Pade,

I am writing to express my deep concern over the recent inaction from Ardagh Glass Inc. This is a business that is not complying with RCWs on emission controls. I urge your organization to take every action possible to gain compliance.

We talk about cleaning up Seattle, about employers doing their part, and this is very much a part of making this city a better place to live and work.

I live extremely close to this business. But I don't only think of myself, but of the employees of Ardagh and other nearby neighbors. I urge your organization and Ardagh to do all you can to comply with current rules and regulations.

Please contact me with any further questions.

Jason Petrait
(206) 384-0829
215 S Orcas St.
Seattle, WA 98108

Steve Van Slyke

From: Clint Berquist <clintberquist@hotmail.com>
Sent: Monday, August 11, 2014 10:32 AM
To: Gerry Pade
Cc: directors@georgetownneighborhood.com
Subject: Ardagh Glass Furnace Rebuild

Dear Gerry -

As a resident of Georgetown, I appreciate PSCAA taking the time to carefully review the permits requests related to the Ardagh Glass furnace rebuild project and am hopeful that reasonable control technology will be included as part of the rebuild. While I understand that there has been pushback in the past due to costs associated with that technology, I think allowing the rebuild without RACT is completely irresponsible. Please do not allow Ardagh Glass to sell out the health and well being of the residents of the neighboring communities for what amounts to a miniscule amount of profit on each bottle manufactured at these facilities.

Thanks,
Clint Berquist
206-321-3143

Steve Van Slyke

From: Lee Larson <eelee6@yahoo.com>
Sent: Monday, August 11, 2014 12:28 PM
To: Gerry Pade
Subject: Ardagh Glass Furnace Rebuild

Dear Gerry -

As a resident of Georgetown, I appreciate PSCAA taking the time to carefully review the permits requests related to the Ardagh Glass furnace rebuild project and am hopeful that reasonable control technology will be included as part of the rebuild. While I understand that there has been pushback in the past due to costs associated with that technology, I think allowing the rebuild without RACT is completely irresponsible. Please do not allow Ardagh Glass to sell out the health and well being of the residents of the neighboring communities for what amounts to a miniscule amount of profit on each bottle manufactured at these facilities.

Thank you,

Lee Larson

Steve Van Slyke

From: Sarah Nenni <nennisb@yahoo.com>
Sent: Monday, August 11, 2014 1:37 PM
To: Gerry Pade
Subject: GRO No. 10606-RACT Determination for Ardagh Glass, Inc

Gerry,

I was unable to attend the public hearing on the GRO concerning Ardagh Glass, Inc. / Saint Gobain's furnace rebuilds, but wanted to make sure I voiced my opinion on the issue.

After reading through the executive summary, the original consent degree, and the public hearing notes, my opinion is as follows. I trust that even though the company will cite all of the improvements they've done throughout their plants and note the high cost of competition, the RACT should be enforced for the rebuilds for the furnaces on E Marginal.

There should be no renegotiation. The company signed a consent degree and although denied liability, paid significant fines to the agency. The compliance plans and schedule were included in the decree because "SGCI was not in compliance...at the time." This does not give me any confidence to trust that their weekly meeting in Muncie is enough to keep them in compliance with the law.

If additional controls can be put onto furnaces in other locations that yield positive results (additional controls in the form of add-ons), then it seems add-on technology could be incorporated into the rebuilds of these furnaces. Simple.

If the Agency allows a delay, extension or an alteration to the GRO, it does a disservice to the citizens of Seattle.

Thank you for your time,
Sarah Nenni-Daher

Steve Van Slyke

From: Justin Howell <justinhowell33@gmail.com>
Sent: Tuesday, August 12, 2014 11:05 AM
To: Gerry Pade
Subject: Ardagh Glass Furnace Rebuild

I'm writing about the proposed Ardagh Glass furnace rebuild. I feel strongly that reasonable control technology should be included as part of the reconstruction. I understand that this technology comes at a cost to the facility owner however Allowing Ardagh to rebuild without considering RACT comes at the cost of those that reside and work in Georgetown.

Please do not allow Ardagh Glass to capitalize on the health and well being of our environment, our children, our homes and our workplaces.

Thank you,

Justin Howell
6230 Carleton Avenue South
Georgetown
206.484.6582

Steve Van Slyke

From: Nancy Case <nancyvcase@gmail.com>
Sent: Wednesday, August 13, 2014 1:35 PM
To: Gerry Pade
Subject: GRO No. 10606-RACT Determination for Ardagh Glass, Inc

Mr. Pade,

As a citizen of South Seattle and a concerned parent, I am writing to express my opinion that there should be no renegotiation with Ardagh Glass, Inc regarding emissions control for the upcoming furnace rebuilds on E. Marginal. I strongly ask that you advocate for enforcing the RACT.

Thank you for your time.

Sincerely,
Nancy Case

Steve Van Slyke

From:	Brooke O'Neill <brookeeliza@gmail.com>
Sent:	Friday, August 22, 2014 12:26 AM
To:	Gerry Pade
Cc:	DeVona Lahrman; Gloria Jacquemart; Irene Stupka; Isabel Mireles; Lashanna Williams; Lora Suggs; Monica Perez; Peter Khai Nguyen; Tom Fragasso; Yami Rios
Subject:	SPNA Letter Ardagh Glass
Attachments:	SPNA Letter Ardagh Glass.pdf

Dear Mr. Pade,
Please see attached letter with comments from the South Park Neighborhood Association on Ardagh Glass, Inc. General Regulatory Order No 10606. Thank you.

Brooke O'Neill

SOUTH PARK

August 21, 2014

Dear Mr. Gerry Pade
Puget Sound Clean Air Agency

On behalf of the South Park Neighborhood Association (SPNA), I write to inform you that we support the General Regulatory Order No. 10606 to establish a Reasonably Available Control Technology (RACT) determination for sulfur dioxide and particulate matter emissions from glass melting Furnaces Nos. 2 & 3 at the Ardagh Glass, Inc. factory (Ardagh) in Seattle.

South Park is an urban-industrial neighborhood with some of the lowest incomes and greatest environmental health disparities within the City of Seattle. A high percentage of South Park residents are foreign-born and people of color. Health status in South Park is relatively poor compared to the rest of Seattle, with higher existing rates of childhood asthma, diabetes, cardiovascular disease, and lung cancer. Environmental exposures, such as air pollution, industrial releases, and contaminated sites are among the highest in the city. However, environmental benefits, such as tree canopy, are less than elsewhere in Seattle (Health Impact Assessment: Proposed Cleanup Plan for the Lower Duwamish Waterway Superfund Site, 2013).

The cost effective emission controls that PSCAA has identified as feasible for Furnaces Nos. 2 & 3 at Ardagh Glass, Inc, are essential to reducing the disparate health impacts and environmental burden affecting the residents of South Park. On behalf of the South Park Neighborhood Association, I request that the General Regulatory Order No. 10606 be executed and that the emission limits defined therein be approved. Thank you for your consideration of this urgent issue in South Park.

Sincerely,

Brooke O'Neill
Co-President SPNA

Steve Van Slyke

From: DeVona Lahrman <snowbizzhwy2@hotmail.com>
Sent: Friday, August 22, 2014 10:30 AM
To: Brooke O'Neill; Gerry Pade
Cc: Gloria Jacquemart; Irene Stupka; Isabel Mireles; Lashanna Williams; Lora Suggs; Monica Perez; Peter Khai Nguyen; Tom Fragasso; Yami Rios
Subject: RE: SPNA Letter Ardagh Glass

Sounds good Brooke. Clean air is one of the hardest challenges we face in South Park. Life expectancy is 11 years less than outside of our area. 3rd world air quality is not an option!

DeVona Lahrman
SPNA-(South Park Neighborhood Association) Director
206 963 4081
snowbizzhwy2@hotmail.com

Date: Fri, 22 Aug 2014 00:26:11 -0700
Subject: SPNA Letter Ardagh Glass
From: brookeeliza@gmail.com
To: gerryp@pscleanair.org
CC: snowbizzhwy2@hotmail.com; douglas98108@yahoo.com; irene.stupka@gmail.com; isabel.mireles@seattle.gov; sparklesinseattle@gmail.com; lora.suggs@gmail.com; monygonzalez0@gmail.com; vinapeter@yahoo.com; tfragasso@yahoo.com; lethy81@hotmail.com

Dear Mr. Pade,
Please see attached letter with comments from the South Park Neighborhood Association on Ardagh Glass, Inc. General Regulatory Order No 10606. Thank you.

Brooke O'Neill

Pepper Hamilton LLP
Attorneys at Law

Suite 200
100 Market Street
P.O. Box 1181
Harrisburg, PA 17108-1181
717.255.1155
Fax 717.238.0575

John W. Carroll
Direct: 717.255.1159
carrollj@pepperlaw.com

August 22, 2014

Via U.S. Mail and E-mail

Mr. Gerry Pade
Puget Sound Clean Air Agency
1904 Third Avenue - Suite 105
Seattle, Washington 98101
gerryp@pscleanair.org

Re: Proposed General Regulatory Order – RACT Determination for PM and SO_2 Emissions from Seattle Furnaces #2 and #3: Comments of Ardagh Glass Inc.

Mr. Pade:

On behalf of Ardagh Glass Inc. ("AGI"), this letter and its attachments timely provide public comments on the proposed general regulatory order by Puget Sound Clean Air Agency ("PSCAA") to determine Reasonably Available Control Technology ("RACT") for total particulate matter and sulfur dioxide emissions from glass melting furnaces (#2 and #3) at AGI's Seattle facility. As you know, the facility was previously operated under the name Saint-Gobain Containers, Inc.

It appears that PSCAA staff may have been dissatisfied with AGI's RACT Analyses as well as the agreement regarding RACT limits and process controls embodied in the 2010 Consent Agreement entered into by AGI and agreed to by USEPA, the Department of Ecology, and PSCAA management. The RACT analysis prepared by PSCAA staff appears to have pre-determined that add-on controls should have been imposed on these two furnaces, because it fails to evaluate or even mention process controls. The documentation prepared by staff seeks to justify a determination that add-on controls are required by proposing the cheapest add-on controls, even though those controls are not currently used by the glass container industry or are no longer supplied by the manufacturer for use at container glass facilities. The proposed RACT Order's focus on these technically deficient control technologies appear to have been presented by staff in order to show that add-on controls are "cost effective," even though these technologies are not reasonably available.

Similarly, the emission limits in the proposed RACT Order are more stringent than any other emission limits applied to container glass furnaces, including those limits determined to be BACT by USEPA and other permitting authorities. For example the BACT emission limit established by USEPA for glass furnaces is 0.45 lb Total PM/ton of glass produced. Seattle Furnace #2 already has a BACT limit of 0.5 lb/ton Total PM. Aware that add-on controls costing in excess of $10 million could not be justified when the reduction in PM emissions would be only 0.05 lb/ton of Total PM, PSCAA staff is recommending emission limits of 0.20 lb Total PM/ton despite the lack of support for such a value in any other container glass permit. All these questionable assumptions were made in order to justify an apparent cost effectiveness of less than $10,000 per ton of emissions reduced. By contrast, an intellectually honest analysis yields a cost-effectiveness figure that is well over $20,000 per ton, a figure that even PSCAA staff would have to acknowledge is not cost-effective.

The fact remains that AGI has implemented the process changes required by the written agreement between the District and AGI regarding control of emissions from Seattle Furnaces #2 and #3. Further, these furnaces are meeting their current permit limits, which are already the most stringent emission limits required of any process-controlled container glass furnace. In other words, these two furnaces are already meeting the definition of RACT.

As a result of the wide gulf between the facts and the RACT analysis performed by PSCAA staff, AGI was compelled to provide these detailed comments to demonstrate how the proposed RACT Analysis unfairly concludes that *unavailable* add-on control devices are RACT.

Exhibit A to this letter provides AGI's detailed comments on the proposed RACT Order, which are grouped into eight sections and address the following topics:

1. The 2010 Consent Decree already determined that "process controls" would be implemented at Seattle Furnaces #2 and #3 and, by law, the process controls constitute RACT.

2. The proposed RACT Order conflicts with the agreement reached between AGI and PSCAA in the 2007 Consent Decree.

3. The proposed RACT Order is based on PSCAA's evaluation of three control technology options, each of which is not "reasonably available" and therefore cannot constitute RACT for a container glass furnace.

4. The proposed RACT Order is based on a PSCAA analysis of emission reductions that contain a series of significant errors.

5. The proposed RACT Order is based on a PSCAA analysis of costs that includes a series of significant errors and omissions for the different emission control technology options.

6. Several potentially significant environmental issues were not considered by PSCAA in generating the proposed RACT Order.

7. The proposed RACT Order, as drafted, would impose the strictest emission limits ever imposed on a container glass furnace in the United States, thereby going well beyond the BACT/LAER emission limits established for container glass furnaces, which by definition should be more stringent.

8. The proposed RACT Order also implicates a number of additional issues, including material misstatements of fact and misunderstandings of furnace operations.

AGI understands that PSCAA will prepare a written response to each of the comments in Exhibit A, and that those responses will be provided to and reviewed by the Board of Directors before a final decision is made on the proposed RACT Order.

In addition, as specified by the 2007 Consent Decree, AGI has already provided PSCAA with numerous documents and data demonstrating that process controls meet the definition of RACT. AGI hereby incorporates these past documents—which are already in PSCAA's possession—into the administrative record for this matter. These incorporated documents include (without limitation) those listed in Exhibit B to this letter.

Thank you for your consideration of AGI's comments.

Sincerely,

John Carroll

John W. Carroll

Enclosures: Exhibit A: AGI comments (including Attachment 1)
Exhibit B: List of key submissions incorporated by reference

c: Laurie Halvorson, PSCAA
Jennifer Dold, PSCAA
Steve Van Slyke, PSCAA
Jim Warner, AGI
Valerie Krulic, AGI
Jayne Browning, AGI
Ty Sibbitt, AGI
Jim Keener, AGI
Michael Gibbons, AGI
Michael Schultz, ENVIRON
Kurt Kissling, Pepper Hamilton

Exhibit A

Comments by Ardagh Glass Inc. ("AGI") on the Proposed General Regulatory Order to Determine RACT for PM and SO_2 at AGI's Seattle container glass Furnaces #2 and #3

I. The May 7, 2010 Consent Decree ("GCD") already determined RACT for PM and SO_2 emissions from Seattle Furnaces #2 and #3

1. AGI is currently engaged in a dispute resolution process with the Puget Sound Clean Air Agency ("PSCAA") concerning the determination of Reasonably Available Control Technology ("RACT") at Seattle Furnaces #2 and #3. That process will proceed before the U.S. District Court for the Western District of Washington, where a federal district judge will ultimately decide whether the GCD signed by PSCAA already defined the RACT emission control measures to be implemented at Seattle Furnaces #2 and #3. In light of this ongoing dispute resolution process before the federal district court, AGI believes that it is inappropriate for PSCAA to finalize the proposed RACT Order.

2. In the GCD, the parties (including PSCAA) negotiated PM and SO_2 emission limits that would apply to each of AGI's glass manufacturing furnaces, including Seattle Furnaces #2 and #3. For example, in § IV at ¶8.a, the GCD established interim SO_2 emission limits until the long-term SO_2 emission control requirements in ¶8.b become effective.

3. The GCD specified "process controls" as the long-term emission control requirements at Seattle Furnaces #2 and #3. *See* Table 3, *SO_2 Emission Controls and Compliance Schedule* (identifying "process controls" for both "Seattle #2" and "Seattle #3").

4. In ¶8.g of the GCD, Table 4, *Process-Controlled Furnaces*, identifies Seattle Furnaces #2 and #3 among the various furnaces that are required to meet a fleet-wide average SO_2 emission limit that only applies to "process controlled" furnaces like Seattle Furnaces #2 and #3.

5. If end-of-stack emission control equipment is added to either Seattle Furnace #2 or #3, it would conflict with the "process control" requirements in ¶8.b and ¶8.g of the GCD and change the applicable limits and compliance demonstration required of every other furnace listed in the GCD at Table 4, *Process Controlled Furnaces*.

6. The ¶8.a interim SO_2 emission limits have applied to Seattle Furnaces #2 and #3 since the GCD was finalized on May 7, 2010, and will continue to apply until a 30-day average SO_2 limit based on "process controls" is applied for by June 30, 2015.

7. Once the process control SO_2 limits are applied for all furnaces in Table 4, then the fleet-wide average SO_2 limit for process controlled furnaces will become immediately effective. Thus, the "long term" SO_2 limit for Seattle Furnaces #2 and #3 that was negotiated by the PSCAA and AGI must be determined on or before June 30, 2015.

8. Also in § IV of the GCD, ¶9.a established an interim filterable PM emission limit that gave way to long-term limits and emission control requirements for the various furnaces. In ¶9.b, Table 5, *Controls for Particulate Matter and Compliance Schedule*, Seattle Furnaces #2 and #3 are both identified as having "Process controls" in place no later than December 31, 2015, after which the interim limit is replaced by a long-term process control limit on Total PM (i.e., filterable and condensable PM) of 1.0 lbs/ton of glass produced, which is more stringent than the federal New Source Performance Standards for glass melting furnaces having modified processes.

9. While the GCD established long-term process control Total PM emission limits that would take effect by the end of 2015, the proposed RACT Order now seeks to substitute stricter emission control requirements, including the installation of new end-of-stack control devices, that become effective less than one year later (i.e., by September 25, 2016).

10. In Regulation 1, § 3.04(a), the PSCAA's regulation expressly requires RACT at all existing sources of emissions.

11. As such, the PSCAA cannot lawfully impose an emission limit for an existing source like AGI's Seattle facility unless that emission limit constitutes RACT.

12. By agreeing to impose upon AGI the Total PM and SO_2 emission limits for Seattle Furnaces #2 and #3 in the GCD on May 7, 2010, the PSCAA, as a matter of fact and as a matter of law, recognized that those emission limits constitute RACT.

13. The Total PM limit required in the GCD for Seattle Furnaces #2 and #3 constitutes RACT.

14. The Washington Department of Ecology ("Ecology") also negotiated and signed the GCD and, by virtue of Ecology's statutory requirements for RACT, could not have agreed to the process control emission limits for Total PM and SO_2 at Seattle Furnaces #2 and #3 unless those limits met the definition of RACT at RCW 70.94.030(20).

15. By insisting that the limits in the GCD are not RACT, PSCAA would be admitting that Ecology violated state and PSCAA laws when signing the GCD because the process controlled Total PM and SO_2 emission limits in the GCD did not meet RACT.

16. AGI provided its initial RACT Analysis for Seattle Furnace #3 to PSCAA on August 4, 2010, less than three months after the GCD effectively established that its process control emission limits for Seattle Furnaces #2 and #3 constituted RACT under Washington and PSCAA law.

17. Consistent with the GCD, each of AGI's RACT Analyses also found that process controls met the applicable RACT requirement.

18. Since the GCD became effective, AGI has made numerous operational and business decisions to ready its fleet of furnaces for the future compliance requirements and other obligations in the GCD. For example, for the fleet-wide 1.95 lbs/ton SO_2 limit that becomes

effective for process controlled furnaces the next year, AGI needed to identify which existing furnaces could reduce emissions most effectively through process controls because some furnaces will remain at 2.5 lbs/ton while others, specifically Seattle Furnaces #2 and #3, will have to meet lower emission limits to achieve the fleet-wide average of 1.95 lbs/ton.

19. This averaging was made possible by implementation of process controls at Seattle, which has already resulted in reducing SO_2 emissions well below the fleet-wide 1.95 lbs/ton average.

20. Seattle Furnaces #2 and #3 have each fully complied with existing SO_2 permit limits for the past seven years and have also complied with the emission limits set forth in the GCD since the date it was signed.

21. If either of the two Seattle furnaces is suddenly removed from the group of "process control" furnaces used to meet the fleet-wide average requirement under the GCD, AGI must now make changes across its fleet to compensate for the loss of the lower "process controlled" emissions and emission limits planned for Seattle.

22. The fact that the proposed RACT Order is being made over four years after the GCD, and less than a year before the June 30, 2015 deadline for establishing furnace SO_2 limits at each of the process-controlled furnaces, constitutes a last-minute bait-and-switch that severely and unfairly prejudices AGI's interests, including its fleet-wide compliance strategy.

II. Procedural Defects in the Proposed RACT Order

23. Under the ¶¶V.B.1-2 of the earlier 2007 Consent Decree, AGI was tasked with undertaking a RACT analysis for SO_2 and PM at least 18 months prior to the next rebuild of Seattle Furnaces #2 and #3, which AGI performed and timely submitted to PSCAA.

24. In fact, AGI submitted separate RACT Analyses to PSCAA on August 4, 2010, and again on September 21, 2012.

25. Although the 2007 Consent Decree required AGI to conduct a RACT analysis—which was timely conducted—the 2007 Consent Decree did not provide PSCAA with the unilateral discretion to (1) dismiss AGI's RACT Analysis without explanation or (2) substitute PSCAA's own RACT analysis.

26. AGI's RACT analyses for Seattle Furnaces #2 and #3 analyzed several add-on control devices, but concluded that process controls met the definition of RACT, thereby fulfilling AGI's obligation to conduct a RACT analysis under the 2007 Consent Decree.

27. PSCAA acknowledged in writing that AGI's 2010 RACT analysis met AGI's legal obligation under the 2007 Consent Decree.

28. After investing considerable resources into AGI's RACT analyses (e.g., in terms of time, energy, and money), AGI was and remains entitled to an explanation from PSCAA as to

why, having met its legal obligation, AGI had its RACT Analyses deemed "incomplete."

29. Please explain in detail the deficiencies in AGI's 2010 RACT analysis which led PSCAA to determine the analysis was incomplete.

30. In light of AGI's investment of considerable resources into its RACT analyses, it was inappropriate for PSCAA to subsequently substitute its own RACT Analysis without giving AGI any opportunity to address any deficiencies in the analyses.

31. Although state and PSCAA law provide the PSCAA with the "authority to perform a source-specific RACT analysis or to order the owner or operator to perform the analysis," it does not provide PSCAA with authority to do both. *See* PSCAA Regulation 1 at § 3.04(d)(underlined emphasis added).

32. It is inappropriate for PSCAA to bill AGI for PSCAA's RACT Analysis because AGI was previously ordered to conduct a RACT Analysis and did so at considerable expense.

33. When PSCAA later conducted its own RACT analysis—without explaining why AGI's analysis was unacceptable—it went beyond the agreement in the 2007 Consent Order and beyond its authority to choose which party conducts the RACT analysis. *See, e.g.,* PSCAA Regulation 1 at § 3.04(d).

34. PSCAA asserts that the 2007 Consent Decree is still in effect and that it calls for RACT implementation at the next major rebuild for a new furnace campaign.

35. Despite this assertion, the proposal seeks to impose the proposed RACT Order emission limits for Seattle Furnaces #2 and #3 by a specific date, thus violating the very Consent Decree the PSCAA relies upon to impose its own version of RACT.

36. Installing stack controls on "hot" operating furnaces is extremely difficult and the added costs are significant, which is why the addition of emission control options is more realistically addressed at a major rebuild, when the furnace is cold and drained of molten glass.

37. PSCAA has offered no justification for why it is authorized to unilaterally bypass the 2007 Consent Decree's agreement that RACT would be implemented by the next rebuild.

38. If PSCAA proposes a rule requiring add-on controls to be installed on hot furnaces, it must include the added cost of such construction in its determination of cost effectiveness.

39. The added cost and safety issues make add-on controls for hot furnaces even more costly.

40. PSCAA asserts that the next scheduled rebuilds for Furnaces 2 and 3 will occur prior to September 2016, but that assumption rests on an outdated long-range forecast prepared by AGI several years ago.

41. While PSCAA, in the Public Notice for the proposed RACT Order, notes that RACT will be required "at the time of the next major rebuild of these furnaces (scheduled for December 2015 and May 2016, respectively," PSCAA has mistakenly converted AGI's outdated long-range forecasts for when rebuilds could take place into rigid deadlines.

42. The rebuild schedules for AGI's furnaces are routinely revised based on a wide variety of changed circumstances, including evolving market conditions, the container glass products being manufactured at the furnace, the condition of the furnace, and the condition of other furnaces.

43. The prior rebuild schedule for Seattle Furnaces #2 and #3 that the PSCAA cites to justify the September 25, 2016 deadline in the proposed RACT Order is from 2013.

44. AGI's schedule for repairing Seattle Furnaces #2 and #3 was revised earlier this year and now forecasts a December 2016 rebuild for Furnace #3.

45. The *current* Seattle Furnace #2 and #3 rebuild forecasts will be revisited many times between now and December 2016, and additional revisions to the rebuild schedule are likely.

46. Further, since the sale of Saint-Gobain Containers, Inc. earlier this year, an internal process to evaluate the various furnaces and rebuild schedules is ongoing.

III. The Proposed RACT Order Only Evaluates *Unavailable* RACT Options

47. The concept of "availability" is a key component of RACT analyses because it determines which control technologies are to be evaluated as "reasonable available" for implementation at the site in question.

48. Each of the three proposed RACT control options evaluated by PSCAA is unavailable rather than reasonably available.

49. Various discussions about what is "available" appear in the guidance available for RACT assessments. From that guidance, a control technology is generally considered "available" if it: (1) has a reasonable or practical potential for application to the proposed source; (2) has been demonstrated in practice at full scale operation; and (3) is commercially available.

50. Ecology's RACT guidance document sets forth several exclusion criteria pursuant to which a given technology should be excluded from further RACT analysis. PSCAA has failed to address those criteria for the control technologies that it evaluated.

51. EPA's 1990 NSR Workshop Manual, also known as the "Puzzle Book," makes several references to the concept of availability, stating:

> (T)echnologies which have not yet been applied to (or permitted for) full scale operations need not be considered available.
>
> * * *

> (A)n applicant should be able to purchase or construct a process or control device that has already been demonstrated in practice.
>
> * * *
>
> A source would not be required to experience extended time delays or resource penalties to allow research to be conducted on a new technique. Neither is it expected that an applicant would be required to experience extended trials to learn how to apply a technology on a totally new and dissimilar source type.

52. In light of these statements, how can PSCAA suggest that the wet ESP+wet scrubber technology option is reasonably available?

53. In light of these statements, how can PSCAA suggest that the CCSS technology option is reasonably available?

54. In light of these statements, how can PSCAA suggest that the baghouse+dry scrubber technology option is reasonably available?

55. In light of these statements, why did PSCAA not consider the ceramic filter+dry scrubber technology option as "reasonably available" for consideration as RACT?

56. Was it excluded because PSCAA knew that such technology is not cost effective?

57. In light of these statements, why did PSCAA not consider the dry ESP+dry scrubber technology option as "reasonably available" for consideration as RACT?

58. Was it excluded because PSCAA knew that such technology is not cost effective?

59. AGI has provided PSCAA with information regarding Cloud Chamber Scrubber System (CCSS) control technology. The information included how the installation of a CCSS on Furnace 5 encountered numerous installation and operational difficulties that resulted in Furnace 5 being limited in the types and colors of glass it can produce. Please explain how the CCSS is considered a "technically" or "economically" feasible control technology when it fundamentally limits how the glass furnace can operate going forward.

60. PSCAA acknowledged, on pp.2-3 of the Executive Summary, that "it is unlikely that [CCSS] would be a technology that would get further consideration for RACT as the manufacturer (Tri-Mer) would not likely propose another Cloud Chamber Scrubber device for this plant." In light of this fact, why did PSCAA build its RACT Analysis on consideration of the CCSS technology?

61. AGI has provided PSCAA with information regarding Cloud Chamber Scrubber System (CCSS) control technology. The information included how the installation of a CCSS on Furnace 5 encountered numerous installation and operational difficulties that resulted in Furnace 5 being limited in the types and colors of glass it can produce. Please explain how the CCSS is considered a successful control technology when it fundamentally changes how a glass furnace can operate.

62. AGI has provided written and verbal communications from Tri-Mer (the only supplier of CCSS technology) indicating they no longer sell CCSS technology for glass furnaces due to their experience with Furnace 5. Please explain how CCSS is considered an available control technology for Furnaces 2 and 3 if it is no longer commercially available.

63. As an unavailable control technology, the CCSS should not be included in determining appropriate RACT limits or in the cost effectiveness evaluations.

64. A wet ESP+wet scrubber system has not been successfully installed and operated on a glass furnace according to research conducted by PSCAA, AGI, and wet scrubber/wet ESP vendors. A control technology is not generally considered available if has not been demonstrated in practice on a similar source type. Please explain how PSCAA concluded that a wet scrubber plus wet ESP system is considered an available control technology for glass furnaces.

65. As previously presented by AGI, a wet scrubber (without an ESP) was installed on a glass furnace in El Monte, CA back in the 1980's. However, the system encountered numerous and significant maintenance and operational problems requiring the issuance of several variances issued by South Coast Air Quality Management District. There were also issues with the wastewater treatment system and the removal of selenium which resulted in enforcement actions related to sewer discharges. Ultimately, the wet scrubber was demolished and replaced with a dry scrubber and dry ESP. In light of this real world experience with a failed technology, why does PSCAA believe that a wet scrubber in Seattle will be more successful than the one previously installed at El Monte?

66. Based on previous experience, a wet scrubber should not be considered technically feasible for a container glass furnace.

67. If a control technology, such as a wet ESP+wet scrubber, were to be applied to a new source type there would likely be unexpected design, installation, and start-up issues. Has PSCAA factored in the issues likely to be associated with a new control technology into its RACT analysis? If so, how?

68. As an unavailable control technology the wet scrubber/wet ESP control system should not be included in determining appropriate RACT limits or in the cost effectiveness evaluations.

69. AGI notes that other applicants and control agencies have concluded that wet control systems for a glass furnace are not feasible. In the Technical Support Document for the Bennu glass facility in Longview, Washington, prepared by Southwest Clean Air Agency ("SWCAA"), it states that:

> the applicant submits that wet scrubbers are not technically feasible because there are no known examples of wet scrubbing being applied to flat or container glass furnaces: therefore the long-term reliability of these systems is not known with this gas stream.

70. SWCAA did not disagree with this assessment.

71. Please explain why PSCAA considers a wet scrubbing system to be feasible.

72. On what points did the PSCAA disagree with previous determinations by other agencies that rejected such systems?

73. PSCAA evaluated a baghouse+dry scrubber control system based on several erroneous assumptions about the only container glass facility in the nation to use a baghouse for PM emission control.

74. Bennu, the only cited container glass furnace using a baghouse, is not a major source of emissions.

75. On p.14 of the PSCAA RACT Analysis, PSCAA acknowledges that "baghouses can be the choice for smaller furnaces, due to their lower capital costs and because their operating costs are roughly proportional to air flow."

76. The Bennu facility has only one furnace, with a maximum production rate of 276 tons of glass per day.

77. PSCAA assumed that AGI would install one baghouse to serve both Furnace 2 and Furnace 3, which have a combined maximum production rate of 435 tons of glass per day.

78. The combined production rate of Seattle Furnaces #2 and #3 take them out of the "smaller furnaces" category for which PSCAA suggested a baghouse would be appropriate.

79. Identify any container glass furnace or combination of furnaces with a production capacity in excess of 400 tons per day which uses a single baghouse to control PM emissions.

80. Based on PSCAA's determination of actual emission reductions and cost analyses, employing two baghouses for the two Seattle furnaces results in a cost effectiveness figure of $14,500/ton, which—even if that figure was acceptable—is not cost effective and not RACT.

81. AGI also notes that, with only one container glass furnace employing a baghouse, the technology is not proven as a sustainable PM control technology for a system serving two furnaces having combined production rates as high as Furnaces 2 and 3.

82. PSCAA did not properly account for the cooling of exhaust air necessary before the exhaust reaches a baghouse and the problems created by moisture in the exhaust stream entering a baghouse.

83. PSCAA did not properly account for the impact of high temperature in the exhaust before it reaches a baghouse if adequate cooling is not provided.

84. AGI previously employed a baghouse at its container glass furnace in Maywood, California, but no longer operates that facility and has not installed a baghouse on a container glass furnace since that time due to concerns with baghouse performance and sustainability on glass furnaces.

85. A baghouse+dry scrubber system is not reasonably available for control of emissions from Furnaces 2 and 3.

86. As indicated by PSCAA's RACT Analysis in Table 6, *Container Glass Furnaces in the Western US*, the overwhelming majority of container glass furnaces that employ end-of-stack emission control devices for PM and SO_2—including new or modified furnaces triggering Best Available Control Technology ("BACT") or Lowest Achievable Emission Reduction ("LAER") level controls—use a dry ESP+dry scrubber.

87. Specifically, of the controlled container glass furnaces identified by PSCAA, 21 out of the 23 use the dry ESP+dry scrubber combination.

88. Despite dry ESP+dry scrubber constituting the industry standard for new or modified container glass furnaces employing end-of-stack controls, PSCAA has completely ignored this technology in the cost analysis contained in the proposed RACT Order.

89. AGI believes that PSCAA intentionally excluded the dry ESP+dry scrubber technology option—at least in the cost analysis—because it would reflect the fact that this is a relatively expensive technology option that is not RACT, but rather BACT/LAER.

90. PSCAA has inappropriately relied on the SO_2 and particulate emission limits for container glass furnaces employing the dry ESP+dry scrubber technology option, but divorced those limits from the use of the same equipment at Seattle Furnaces #2 and #3.

91. Evaluating the limits achievable with the dry ESP+dry scrubber technology while ignoring the cost-effectiveness burden associated with such controls results in an apples-to-oranges comparison because PSCAA attempts to rely on dry ESP+dry scrubber limits, while ignoring the dry ESP+dry scrubber performance and costs.

92. The BACT/LAER limits achieved by new and modified furnaces identified in Table 6 of PSCAA's RACT Analysis are less stringent than the limits PSCAA seeks to designate as RACT for Seattle Furnaces #2 and #3.

93. If the BACT/LAER limits imposed on new or modified furnaces could be met by the less expensive technology which PSCAA claims are available and achievable as retrofit technologies for existing sources, those facilities which installed dry ESP/dry scrubber technologies would have opted for the less expensive technologies. That they didn't choose those technologies is further proof that the technologies evaluated in PSCAA's RACT Analysis are not RACT.

IV. The Proposed RACT Order Contains Numerous Errors in the Estimates of PM and SO_2 Emission Reductions

94. PSCAA concludes that RACT for Total PM is 0.20 lbs/ton (as determined by PSCAA Method 5). PSCAA also concludes that RACT for SO_2 is 0.60 lbs/ton (24-hour average) and 0.50 lbs/ton (30-day rolling average), as determined by CERMS. The proposed limits are the most stringent limits on container glass furnaces in the United States.

95. USEPA has determined that 0.45 lbs/ton Total PM is BACT for other container glass furnaces.

96. Yet, if one were to apply that BACT limit to Seattle Furnace #2, the incremental reduction in PM emissions compared to the current 0.5 lbs/ton limit on PM is too small to justify the installation of end-of-stack PM emission control equipment.

97. The current 0.5 lbs/ton limit on Total PM from Furnace #2 was imposed by PSCAA as a BACT limit.

98. The 0.5 lbs/ton limit on Total PM from Furnace #2 remains the tightest Total PM limit in the country for a container glass furnace that is not employing end-of-stack controls

99. USEPA determined with respect to the Durand Glass Company, that BACT for Total PM would be set by testing, with a final limit being no lower than 0.35 lbs/ton and no higher than 0.70 lbs/ton. That range for BACT is less stringent than the 0.2 lbs/ton value PSCAA proposes as RACT.

100. How would the cost effectiveness for PM controls be affected if the reduction of PM was based on a current BACT limit of 0.45 lbs/ton Total PM?

101. The limit of 0.2 lbs/ton cited in Table 6 of the PSCAA RACT Analysis showing emission limits for all container glass furnaces in the western US are based on filterable PM only. The only limits in Table 6 for Total PM are 0.5 lbs/ton at Tracy and 0.45 lbs/ton at Gallo.

102. Different glass types generate different emission levels. This is reflected in the SO_2 emission limits in the GCD for the flint versus colored glass. In addition, AGI has provided PSCAA with plots showing how emissions change with glass types. How has PSCAA taken the different emission rates and frequent glass changes into consideration when developing the proposed emission limits?

103. PSCAA proposed that RACT is 0.60 lb SO_2/ton (24-hour average) and 0.50 lb SO_2/ton (30-day rolling average) determined by CERMS. According to the PSCAA technical report, these limits were chosen in part to be consistent with those at Bennu.

104. The stringency of a limit is based to some degree on the means required to demonstrate compliance. Thus a limit based on a three-hour stack test performed once per year is less

stringent than the same limit monitored continuously throughout the year (8760 hours per year).

105. Bennu is required to demonstrate compliance with its permit limit based on annual source testing (three one-hour runs) and during its most recent test was found to be operating right at its SO_2 limit.

106. Annual source testing allows for a facility to optimize conditions to minimize emissions.

107. Annual source testing also allows a facility to avoid having to account for different operating conditions encountered at a source.

108. Facilities that use CERMS to demonstrate compliance will naturally have greater variability in the recorded emission rates and should have more flexible emission limits that reflect the inherent variability.

109. How has PSCAA used the CERMS data from Furnace 3 to determine appropriate emission limits on a daily and rolling 30-day basis?

110. How was the variability in readings accounted for in the proposed RACT limits?

111. AGI is not aware of any other glass furnace with daily emission limits where the CERMS are used to determine compliance.

112. Requiring the facility to meet the proposed daily RACT limits for all glass types and operating conditions would put the Seattle facility at a competitive disadvantage compared to other container glass furnaces.

113. Has PSCAA identified other glass furnaces with daily emission limits where the CERMS are used to determine compliance?

114. What are the emission limits for those facilities?

115. When determining the emission reduction under the actual emissions scenario, PSCAA calculates the baseline emissions using source testing data for the last 20 years.

116. Using source test data from such a long time period results in baseline emissions that do not reflect the changes instituted at the facility since the GCD became effective.

117. The process changes already instituted at Seattle Furnaces #2 and #3 resulted in lower and more consistent emission rates, which are in compliance with current permit limits and which are expected to continue in the future.

118. Please explain the rationale for using 20 years of emissions data to determine baseline emissions.

119. A baseline period of the most recent two years would be more representative of baseline emissions and much better basis for calculating emission reductions under the various scenarios evaluated.

120. A baseline period of the most recent two years would also be more consistent with baseline emission calculations from other regulatory programs.

121. Explain why PSCAA decided to exclude the 2 year baseline emissions provided by AGI from their analyses.

122. Baseline emissions for Furnace 2 should be calculated based on an emission factor of 0.39 lbs/ton for PM and 0.73 lbs/ton for SO_2.

123. Baseline emissions for Furnace 3 should be calculated based on an emission factor of 0.52 lbs/ton for PM.

124. When determining the emission reduction under the actual emissions scenario, PSCAA calculates the emission reduction using assumed control efficiencies which are not reflective of current operations.

125. PSCAA expects 90% control of SO_2 actual emissions from the wet ESP+wet scrubber. However, to achieve 90% control the "blowdown" from the system would need to be approximately 3 gallons per minute per furnace (based on A.H. Lundeberg's first quotations).

126. As discussed in several AGI submittals, the control efficiency of a wet system is correlated to the blowdown rate.

127. Explain how in the actual emission scenario the wet ESP+wet scrubber can control SO_2 emissions by 90% with a blowdown rate of 1.5 gallons per minute.

128. If the control efficiency were lower, how would it impact the cost effectiveness calculations?

129. If the blowdown rate were higher, how would it impact the cost effectiveness calculations?

130. A significant annual operating cost for the dry scrubber plus baghouse system is due to the disposal of a fraction of the collected dry precipitate.

131. PSCAA has stated that it would not dictate what ingredients are used by AGI in making glass, yet it makes aggressive assumptions about the amount of precipitate which can be recycled back into the furnace.

132. The cost-effectiveness should be determined assuming that no precipitate can be reintroduced into the furnace as an ingredient.

133. PSCAA calculated the quantity of precipitate (or dust) generated based on a ratio of the molecular weights of $CaSO_4$ and SO_2. However, all vendors specify a rate of reagent addition that is greater than the molecular ratio since during actual operations, there is not perfect mixing and unlimited reaction times.

134. Explain why PSCAA chose to use the ratio of molecular weights it did to calculate reagent addition rates, rather than the rates prescribed by Tri-Mer or those used at the Bennu facility.

135. It has been estimated that the PM formed in the scrubber increases the inlet PM loading to the PM control device by a factor of ten.

136. How would reagent usage impact the quantity of dust collected by the baghouse and how would this impact the annual operating costs for the dry scrubber plus baghouse system?

137. Based upon an assumption that the dry precipitate can be recycled back to the furnace in place of reagent (soda ash or Sorbical, etc.) a credit is applied to the cost effectiveness calculations in PSCAA's report.

138. In doing so, PSCAA assumes that one pound of dust from the control system would replace one pound of reagent. However, based on AGI's experience at other facilities, one pound of dust can only replace up to 0.8 pounds of reagent (as detailed in the cost effectiveness calculations provided by AGI).

139. Explain the rationale for assuming one pound of dust from the control system would replace one pound of reagent despite real-world experience indicating otherwise.

140. If the recovery credit were calculated assuming one pound of dust can only replace 0.8 pounds of reagent how would it impact the recovery credit and the annual operating costs?

141. AGI's RACT analyses for Furnaces 2 and 3 have concluded that RACT should be process controls. An AGI evaluation of emissions data supported that such process controls can achieve a lower emission limit than the current limits for SO_2 on both Furnace 2 and Furnace 3 on a rolling 30-day basis as determined by CERMS.

142. Why weren't process controls assessed in the PSCAA technical report?

143. It is common for BACT and RACT analyses to assess the incremental cost of adding additional controls to a system. AGI submitted an analysis of the incremental costs associated with adding pollution control equipment to Furnaces 2 and 3 as compared to operating with process controls.

144. Explain why PSCAA did not utilize an incremental cost assessment in analyzing the various control options, including process controls.

145. What impact would using SO_2 emission limits of 1.6 lb/ton and 1.95 lb/ton as a baseline to determine incremental deductions have on the calculated potential emission reductions and the cost effectiveness evaluations?

V. The Proposed RACT Order Contains Numerous Errors and Omissions in the Development of Estimated Costs

146. AGI has provided written and verbal statements (including from independent glass chemistry experts) that it is not possible to recycle or reuse the wet effluent from a CCSS in the glass furnace without limiting the types of glass that can be produced.

147. There are many factors that contribute to the technical infeasibility of reusing the wet effluent, but the primary challenges are the variability in the total amount of sulfur and the variability in the concentrations of specific sulfur compounds (sulfates versus sulfites).

148. Explain why two of the three CCSS scenarios assessed by PSCAA for economic feasibility assumed a portion of the wet effluent was recycled back to the furnaces.

149. The theoretical concerns regarding wet effluent recycling are backed by first-hand experience at Furnace 5, which has only been able to produce flint or oxidized glass since the operation of the CCSS and recycling of the CCSS effluent back to the furnace.

150. Does PSCAA possess information or examples that indicate wet effluent can be recycled back to a glass furnace without negatively impacting furnace performance?

151. If so, provide the evidence.

152. The wet scrubber plus wet ESP systems quoted by AH Lundberg and Envirotech are very basic and only cover the basic control equipment and partial installation costs. Items that are not included in the wet ESP+wet scrubber quotes are reagent storage and feed systems, exhaust duct, furnace pressure control system, and effluent handling and storage equipment (Note that this not a comprehensive list).

153. The additional equipment were included and called out in the AGI-provided cost effectiveness evaluations.

154. Explain why the additional equipment was not included in the PSCAA analyses.

155. If the costs associated with the above referenced additional equipment were added to the primary equipment costs, how would it impact the Total Capital Investment ("TCI")?

156. How would it impact the remaining cost effectiveness calculations?

157. A wet ESP+wet scrubber is similar to a CCSS. The two systems often control the same pollutants, utilize many of the same parts and principles, and are often competing for the same applications. Due to the many similarities and cross-competition, the TCI for a wet

scrubber plus wet ESP should be comparable to the TCI for a CCSS. Discussions with Tri-Mer confirm that they offer both types of systems (although not for glass furnaces) and the TCI difference is typically insignificant.

158. PSCAA calculated that a wet ESP+wet scrubber for two furnaces would require a TCI of $1,989,169, which is less than half of the actual TCI required for a single CCSS for Furnace 5 ($4,645,000). Please explain how the TCI calculated cost can be justified in light of the cost estimates provided by Tri-Mer.

159. Did PSCAA review their methodology or assumptions for the wet scrubber plus wet ESP after Tri-Mer provided the CCSS costs and discussed them with PSCAA?

160. If the TCI for a wet ESP+wet scrubber was double previous estimates, how would it impact the overall cost effectiveness calculations?

161. AGI has provided written and verbal evidence (including from independent glass chemistry experts) that it is not possible to recycle or reuse the wet effluent from a wet scrubber plus wet ESP in the glass furnace without limiting the types of glass that can be produced.

162. There are many factors that contribute to the technical infeasibility of reusing the wet effluent, but the primary challenges are the variability in the total amount of sulfur and the variability in the concentrations of specific sulfur compounds (sulfates versus sulfites).

163. Explain why two of the three wet ESP+wet scrubber scenarios assessed by PSCAA for economic feasibility assumed a portion of the wet effluent was recycled back to the furnaces.

164. The theoretical concerns regarding wet effluent recycling are backed by AGI's first-hand experience at Seattle Furnace 5, which has only been able to produce flint or oxidized glass since the operation of the CCSS and recycling of the CCSS effluent back to the furnace.

165. PSCAA obtained the cost for a dry scrubber plus baghouse from a similar system installed by Bennu and permitted by SWCAA. The permit application contained a BACT analysis and listed a TCI of $2,424,570 for a dry scrubber plus baghouse for a single furnace.

166. Notations in the Bennu cost effectiveness calculations indicate that this value represents the "total installed cost for dry scrubber plus baghouse system". As discussed in the USEPA Air Pollution Cost Control Manual at pp.2-5, TCI includes the installed cost of the equipment but it also includes many other costs.

167. Explain why PSCAA used the total installed cost for the dry scrubber plus dry ESP as the TCI without consideration of the other costs referenced in the Manual.

168. If the total installed cost were used in place of TCI, what capital costs might be excluded from consideration?

169. Did PSCAA review any of the actual quotations or costs provided by vendors for the Bennu baghouse+dry scrubber system to determine whether it needed modifications for use with respect to Seattle Furnaces #2 and #3?

170. Did PSCAA review the actual quotation provided by SORG for the Bennu dry scrubber baghouse system to determine what was or was not included in the quotation?

171. According to the SWCAA permit, Luhr Filter GmbH & Co. provided the Bennu baghouse+dry scrubber control system (US branch is Kuttner).

172. AGI contacted Kuttner and obtained a rough planning quote for a similar system to control Seattle Furnaces #2 and #3, which was provided to PSCAA as well as contact information for Kuttner representatives.

173. Kuttner quoted installed costs of three to four million dollars. Please explain how this information was incorporated into the PSCAA cost effectiveness evaluation.

174. As indicated in their quotation, Kuttner's installed costs are not equivalent to the TCI that would be required to purchase and install the control system.

175. Can PSCAA explain why their estimate for the TCI for a single dry scrubber plus baghouse control system for Seattle Furnaces #2 and #3 are equivalent to the installed equipment costs estimated by Kuttner?

176. Why did PSCAA use an installed cost for the Bennu system of only $1.8M when evaluating the 50% recycle option for a baghouse+dry scrubber system?

177. Using the USEPA Air Pollution Cost Control Manual and ignoring site preparation, building, and retrofit costs, installed costs of three to four million dollars would result in a TCI of roughly six to eight million dollars.

178. This is roughly twice as much as the TCI calculated by PSCAA based on the Bennu permit application.

179. If the TCI for a dry scrubber plus baghouse were double previous estimates, how would it impact the overall cost effectiveness calculations?

180. PSCAA estimated costs associated with a dry scrubber plus baghouse based on a similar system installed at the Bennu facility in southwest Washington. Did PSCAA make any effort to double-check or critically review the TCI value used in the Bennu permit application ($2,414,570)?

181. Does the cost effectiveness calculations contained in the Bennu permit application refer to the $2,414,570 costs as "installed costs"?

182. Did PSCAA calculate the sales tax associated with the baghouse+dry scrubber system? If so, what was the estimated sales tax?

183. Did PSCAA calculate the freight costs associated with the baghouse+dry scrubber system? If so, what were the estimated freight costs?

184. Did PSCAA calculate the foundations and supports costs associated with the baghouse+dry scrubber system? If so, what were the estimated foundations and supports costs?

185. Did PSCAA calculate the handling and erection costs associated with the baghouse+dry scrubber system? If so, what were the estimated handling and erection costs?

186. Did PSCAA calculate electrical costs associated with the baghouse+dry scrubber system? If so, what were the estimated electrical costs?

187. Did PSCAA calculate the piping associated with the baghouse+dry scrubber system? If so, what were the estimated piping costs?

188. Did PSCAA calculate the insulation for ductwork costs associated with the baghouse+dry scrubber system? If so, what were the estimated costs for insulation of the ductwork?

189. Did PSCAA calculate the painting costs associated with the baghouse+dry scrubber system? If so, what were the estimated painting costs?

190. Did PSCAA calculate the engineering costs associated with the baghouse+dry scrubber system? If so, what were the estimated engineering costs?

191. Did PSCAA calculate the contractor fees associated with the baghouse+dry scrubber system? If so, what were the estimated contractor fees?

192. Did PSCAA calculate the handling and erection costs associated with the baghouse+dry scrubber system? If so, what were the estimated handling and erection costs?

193. Did PSCAA calculate the startup costs associated with the baghouse+dry scrubber system? If so, what were the estimated startup costs?

194. Did PSCAA calculate performance test costs associated with the baghouse+dry scrubber system? If so, what were the estimated performance test costs?

195. Did PSCAA calculate the contingency costs associated with the baghouse+dry scrubber system? If so, what were the estimated contingency costs?

196. PSCAA claimed that it used the USEPA Air Pollution Control Cost Manual for the evaluation of the economic feasibility of the control systems.

197. Identify each instance where PSCAA chose to deviate from the approach recommended in the USEPA Manual, and explain why that decision was made.

198. The USEPA Manual includes the option of using a retrofit factor for existing systems.

199. The USEPA Manual, at pp.2-28, states:

> to quantify the unanticipated additional costs of installation not directly related to the capital cost of the controls themselves, engineers and cost analysts typically multiply the cost of the system by a retrofit factor... Such unexpected costs include - but are certainly not limited to - the unexpected magnitude of anticipated cost elements; the costs of unexpected delays; the cost of re-engineering and re-fabrication; and the cost of correcting design errors... At this level, a retrofit factor of as much as 50 percent can be justified.

200. PSCAA did not use a retrofit factor in any of its calculations despite it being an existing facility with older systems and equipment, as well as facing severe space constraints which PSCAA acknowledges would require the demolition of existing structures.

201. Explain why PSCAA did not apply a retrofit factor to any of the cost assessments.

202. According to the USEPA Manual, retrofit factors can range from 10% to 50% of TCI. Given the age of the equipment, the complexity of the furnace operations and the space constraints, a retrofit factor on the upper end of the range would be appropriate.

203. How would the application of a retrofit factor of 50% impact the cost effectiveness calculations?

204. AGI spent considerable effort developing a plan and cost estimate for potential emission controls for Furnaces 2 and 3.

205. AGI and Tri-Mer engineers spent several days at the Seattle facility identifying locations, developing control system specifications and parameters, discussing feasible control technologies, and generating cost estimates.

206. The AGI/Tri-Mer team identified a dry scrubber plus ceramic filter system as the most likely control technology for the location and parameters.

207. Explain why the systems and the associated costs that were researched and developed by AGI and its technical team for implementation at Seattle were not presented or even referenced in the PSCAA analyses.

208. The AGI/Tri-Mer control system would have a TCI of $11,869,000 based on the calculations prepared by the AGI/Tri-Mer Team.

209. The costs developed by PSCAA for the different control options that it ranged from two- to five-times lower than the AGI/Tri-Mer costs.

210. Explain if and how the detailed cost evaluation prepared by AGI/Tri-Mer was incorporated into or addressed by the PSCAA analyses.

211. AGI has already installed or is in the process of installing pollution control technologies at other facilities in order to comply with the GCD.

212. The TCI for these systems range from $10,804,000 to $15,641,000 and have been provided to PSCAA.

213. AGI believes the cost estimates developed by PSCAA significantly underestimate the capital investment that will be incurred by the Seattle facility if they install a control system.

214. How did PSCAA incorporate or address the actual costs of similar control technologies at other AGI facilities into their analyses?

215. Did PSCAA revise any of their cost evaluation methodology, data, or assumptions after reviewing the actual costs at other AGI facilities?

216. Does PSCAA believe that its estimated costs will be more accurate at predicting the costs of control equipment at Seattle than the recorded costs at similar facilities? Please explain.

217. If the proposed RACT Order emission limits are issued as proposed and AGI is required to meet those limits (after judicial review), AGI would be compelled to install a ceramic filter+dry scrubber filter system based on: (1) AGI's and the container glass industry's experience with installing and operating end-of-stack emission control equipment; and (2) AGI's need to install equipment with a proven track record for effectively limiting PM and SO_2 emissions (respectively) from container glass furnaces such as Seattle Furnaces #2 and #3.

218. PSCAA used the USEPA Manual to evaluate cost effectiveness of the different control options. Foundation and support costs were estimated using a factor of 0.04 multiplied by the Purchased Equipment Costs. This factor is for ESP's which are typically dry. A wet system is heavier and requires more substantial foundations and supports, as evidenced by the EPA factor of 0.12 for wet scrubbers. Please explain why PSCAA used 0.04 instead of 0.12 to estimate Foundation and Support costs for the wet ESP+wet scrubber and the CCSS.

219. Piping costs were estimated using a factor of 0.01 multiplied by the Purchased Equipment Costs. This factor is for ESP's which are typically dry. A wet system would typically require additional piping, as evidenced by the USEPA factor of 0.30 for wet scrubbers. Please explain why PSCAA used 0.01 instead of 0.30 to estimate Piping costs for the wet ESP+wet scrubber and the CCSS.

220. PSCAA calculated the costs for site preparation using factors from Plant Design and Economics for Chemical Engineers. These factors were supposed to represent yard and fence lighting and other improvements. Depending on the system, PSCAA site preparation costs ranged from $4,505 to $22,598. Please indicate if any of the following costs were also covered: high density storage racks, paving access areas, leasing off-site repair/laydown areas, off-site vendor parking, and modification to existing flues.

221. AGI Engineers estimated site preparation costs based on costs at other AGI facilities as well as a multi-day assessment of the Seattle facility. Site preparation costs (excluding demolition) were projected to be $489,000 and included costs for high density storage racks, paving access areas, leasing off-site repair/laydown areas, off-site vendor parking, and modification to existing flues. Were any of these costs incorporated into the PSCAA analyses?

222. PSCAA calculated the demolition costs using RSMeans Data Online for a 3000 square foot warehouse. The PSCAA calculated demolition costs totaled $2,373. The AGI Engineering Team calculated demolition costs of $413,000 for control systems that address Seattle Furnaces #2 and #3. The location identified by the AGI/Tri-Mer team currently houses an oil tank building and an outdoor substation. Please indicate which of the following costs are included in the PSCAA demolition costs and their corresponding costs:

- Demolition of the oil tank building
- Demolition of the oil tank containment area
- Removal and disposal of the transformer and switchgear
- Demolition/capping Furnace 3 stack base
- Environmental/soil testing
- Abatement of any contaminated soil or debris

223. PSCAA estimated the total site preparation and demolition costs to range from $4,900 to $25,000 depending on the control system. This is more than an order of magnitude less than the comparable costs developed by the AGI Engineering Team based on their assessment of the Seattle site and experience at other AGI facilities. Please explain why PSCAA's lower cost estimates are more reasonable than those developed by AGI.

224. Attachment 1 to these Comments contains AGI's *Construction Cost Estimate* for the installation of ceramic filter+dry scrubber control technology.

225. Attachment 1 was previously provided to PSCAA earlier this year.

226. Attachment 1 was developed by AGI's project engineers in consultation with equipment vendors and contractors that have assessed the ceramic filter+dry scrubber technologies as well as how those technologies could be implemented at the Seattle facility. As such, their cost estimates are divided between the "base" costs associated with these technologies (when installed at any location) as well as the construction costs associated with installing these technologies at the extremely space-constrained Seattle facility for Furnaces #2 and #3.

227. Attachment 1 does not include the operating costs for this technology, which would be additional.

228. As listed on Attachment 1's "Summary" page and as further explained in Attachment 1's "supporting information," the "Process Equipment" cost for this technology is listed as $5,311,001 (i.e., $5,098,001 for the base equipment costs and $213,000 for the additional equipment needed for complete installation at the Seattle facility). If PSCAA disagrees with this component cost estimate, please explain why and identify the supporting evidence for your conclusion.

229. As listed on Attachment 1's "Summary" page and as further explained in Attachment 1's "supporting information," the "Utilities Process" cost for this technology is listed as $347,750. If PSCAA disagrees with this component cost estimate, please explain why and identify the supporting evidence for your conclusion.

230. As listed on Attachment 1's "Summary" page and as further explained in Attachment 1's "supporting information," the "Electrical Power Process" cost for this technology is listed as $614,800. If PSCAA disagrees with this component cost estimate, please explain why and identify the supporting evidence for your conclusion.

231. As listed on Attachment 1's "Summary" page and as further explained in Attachment 1's "supporting information," the "Structural Process" cost for this technology is listed as $1,294,707. If PSCAA disagrees with this component cost estimate, please explain why and identify the supporting evidence for your conclusion.

232. As listed on Attachment 1's "Summary" page and as further explained in Attachment 1's "supporting information," the "Site Work" cost for this technology is listed as $489,900. If PSCAA disagrees with this component cost estimate, please explain why and identify the supporting evidence for your conclusion.

233. As listed on Attachment 1's "Summary" page and as further explained in Attachment 1's "supporting information," the "Demolition" cost for this technology is listed as $413,000. If PSCAA disagrees with this component cost estimate, please explain why and identify the supporting evidence for your conclusion.

234. As listed on Attachment 1's "Summary" page and as further explained in Attachment 1's "supporting information," the "Ancillary Cost" for this technology is listed as $3,398,298. If PSCAA disagrees with this component cost estimate, please explain why and identify the supporting evidence for your conclusion.

235. As listed on Attachment 1's "Summary" page and as further explained in Attachment 1's "supporting information," the total construction cost for this technology is listed as $11,869,456. If PSCAA disagrees with this overall cost estimate, please explain why and identify the supporting evidence for your conclusion.

236. AGI's cost estimates for add-on controls at Seattle are based on real-world experience in installing similar equipment at other facilities.

237. PSCAA's cost estimates rely on the USEPA Manual, which has a disclaimer stating that its cost estimation methodology is only accurate to within 30%.

238. Adding 30% to the cost effectiveness calculations made by PSCAA for emission reductions achievable with a baghouse+dry scrubber makes such technology—even assuming that it was reasonably available—too expensive to be considered cost-effective.

VI. Additional Environmental Consequences Were Not Considered in the PSCAA's Proposed RACT Order

239. PSCAA has failed to evaluate and determine the adverse environmental impacts of using add-on control devices.

240. There is no consideration given to the additional GHG emissions which will result from the use of carbon-based scrubber reagents.

241. There is no consideration given to cross-media impacts such as the environmental impacts of trucking solid waste to offsite locations for disposal.

242. There is no consideration of the environmental impacts of managing and disposing of the waste generated by the capture systems.

VII. If Approved, the Proposed RACT Order Would Impose the Strictest Emission Limits in the Entire United States for a Container Glass Furnaces, Including Those Furnaces Employing BACT and LAER

243. Despite the fact that RACT, by definition, must be "reasonably available," the proposed RACT Order, if approved, would create precedent-setting emission limits in terms of imposing high costs or requiring unproven technologies.

244. The cost effectiveness determination fails to consider the one technology used most frequently in the industry for new or modified furnaces: a dry ESP+dry scrubber.

245. The cost effectiveness determination instead relies on technologies which have been tried and rejected in the glass industry such as a wet ESP and CCSS, both of which are not achieved in practice by the container glass industry.

246. As PSCAA has admitted, this is the first "source-specific" RACT determination conducted by the PSCAA in roughly 20 years.

247. Seattle Furnace 2 already has BACT level permit limits for PM and SO_2. What is the justification for imposing a RACT limit that is more stringent than BACT?

248. The GCD already specified "process controls" for Seattle Furnaces #2 and #3 as RACT. Unlike add-on controls, process controls can be readily implemented on hot furnaces and do not require the furnace to go cold before they can be achieved

249. AGI submitted PSCAA-ordered RACT determinations finding that process controls constitute RACT for Seattle Furnaces #2 and #3. The 2007 Consent Decree does not authorize PSCAA to determine what is RACT or to impose its definition on AGI; it merely requires that AGI evaluate various methods determined to be RACT and to implement "the emissions reduction method or methods identified as meeting the regulatory definition of reasonably available control technology."

250. PSCAA's technical analysis in support of the proposed RACT Order is arbitrary and capricious because it uses the level of emission reductions achieved at furnaces employing dry ESP+dry scrubber, but fails to consider the costs and other challenges of employing dry ESP+dry scrubber technology for Seattle Furnaces #2 and #3.

251. PSCAA's technical analysis in support of the proposed RACT Order is arbitrary and capricious because it fails to evaluate the end-of-stack emission control technology actually employed by the container glass industry for Total PM and SO_2 reduction (i.e., dry ESP+dry scrubber is being employed for over 90% of the container glass furnaces using end-of-stack controls).

252. PSCAA instead analyzed technologies that are not in use at any container glass furnaces (i.e., wet ESP). Why?

253. PSCAA instead analyzed technologies that are employed at Bennu, which has a single small furnace (baghouse+dry scrubber) at a minor source. Why?

254. PSCAA also analyzed a technology that is no longer commercially available due to unresolved technical problems (CCSS). Why?

255. PSCAA has ignored "reasonably available" technologies in favor of analyzing the costs of unavailable technologies.

256. For an emission control technology to be "reasonable available," it should be a technology that is actually used by the industry in question.

257. When the Bennu facility was evaluated by the SWCAA just a few years ago, both wet scrubbers and CCSS were found "not technically feasible" because neither technology was sufficiently demonstrated in practice at a container glass manufacturing facility, i.e., these technologies lacked "demonstrated long-term reliability."

258. Given that the CCSS vendor is now unwilling to install CCSS on a container glass furnace, these earlier conclusions by the Southwest Washington Clean Air Agency are further supported.

259. One of the clearest indictments of PSCAA's proposed RACT Order is the fact that it seeks to impose the strictest Total PM and SO_2 control requirements applicable to a container glass furnace in the entire country, including container glass furnaces subject to BACT and LAER requirements.

260. The BACT and LAER requirements are stricter than RACT requirements under the Clean Air Act as well as its local counterparts.

261. The fact that RACT is not as stringent as BACT or LAER was already recognized by the Washington Court of Appeals in *Bowers v. Pollution Control Hearings Board*, 103 Wn. App. 587; 13 P.3d 1076; 2000 Wash. App. LEXIS 2426 (Dec. 4, 2000), where the court stated:

> In comparison, new and modified sources are required to comply with the more stringent "best available control technology" (BACT) or "lowest achievable emission rate" (LAER) standards.

262. In USEPA's NSR settlement with Owens-Brockway Container Glass Inc., less than two years ago, BACT-level emission limits for SO_2 at furnaces employing end-of-stack emission controls were set at 0.8 lbs/ton as a 30-day rolling average. By contrast, the proposed RACT Order specifies a 0.50 lbs/ton limit as a 30-day rolling average, but also adds a 0.60 lbs/ton limit as a 24-hour rolling average. Thus, PSCAA seeks to impose RACT SO_2 emission limits that are far stricter than BACT, e.g., PSCAA's 30-day rolling average RACT limit is 62.5% of USEPA's BACT limit <u>and</u> PSCAA created an additional 24-hour limit.

263. PSCAA has selected a limit of 0.50 lbs/ton for SO_2 emissions because the emissions from Furnace #3 are already averaging 0.8 lbs/ton and thus a proposed rule consistent with other recent BACT determinations would result in no emission reductions for that Furnace and the cost-effectiveness value (in dollars per ton of emissions reduced) would not meet RACT criteria.

264. Also in USEPA's NSR settlement with Owens-Brockway Container Glass Inc., BACT-level emission limits for <u>filterable</u> PM at furnaces employing end-of-stack emission controls were set at 0.20 lbs/ton. By contrast, the proposed RACT Order specifies a <u>Total</u> PM emission limit of 0.2 lbs/ton. Thus, PSCAA seeks to impose a RACT particulate emission limit that is stricter than BACT.

265. In USEPA's NSR settlement with Durand Glass Manufacturing Company, Inc., less than two years ago, BACT-level emission limits for filterable PM at furnaces employing end-of-stack emission controls were set at 0.2 lbs/ton. By contrast, the proposed RACT Order specifies a Total PM emission limit of 0.2 lbs/ton. Thus, PSCAA seeks to impose a RACT particulate emission limit that is stricter than BACT.

266. The Durand agreement also set a Total PM limit of between 0.35 lbs/ton and 0.7 lbs/ton to be set after testing at 125% of the highest three-hour average test result from three years of testing.

267. In the GCD, in addition to setting agreed-upon RACT limits for Seattle Furnaces #2 and #3, there were BACT limits set for other furnaces. Those PM limits for BACT controlled furnaces were set at 0.2 lbs/ton filterable PM and 0.45 lbs/ton Total PM.

268. PSCAA has purposefully chosen to ignore the BACT PM limits for Total PM defined as BACT and achieved at other container glass furnaces.

269. By ignoring the Total PM BACT limit of 0.45 lbs/ton and utilizing the 0.2 lbs/ton value in its cost effectiveness calculations, PSCAA has effectively cut the true cost effectiveness value in half, making controls which are not truly cost effective seem as though they were.

270. None of the USEPA NSR settlements (i.e., with Owens-Brockway, Durand, or AGI) employed any of the three technology options evaluated by PSCAA as "reasonable available" in the proposed RACT Order with the exception of CCSS, which was noted as an experimental technology being employed at Seattle. Since that settlement, however, CCSS has proven technically infeasible for container glass furnaces and the only CCSS vendor has decided against any future installations of the technology at container glass furnaces.

271. In EPA's NSR settlement with AGI, beyond BACT-level emission limits for SO_2 at furnaces employing end-of-stack emission controls were set at 45 ppm when the inlet concentration is less than 350 ppm, due to the difficulty in achieving lower emissions reductions when the exhaust stream is already at a low level.

272. Seattle Furnace #3 has operated with process controls at emission concentrations of SO_2 averaging 48 ppm (0.8 lbs/ton) since the continuous emission monitor was installed and Furnace 2 has operated with process controls at emission concentrations as low as 44 ppm (0.5 lbs/ton) in recent years.

273. Has PSCAA analyzed the emissions reductions achievable with each control method based on the low inlet SO_2 concentrations?

274. In PSCAA's RACT Analysis, Table 7, *Emission Limits*, PSCAA identified various Total PM and SO_2 limits for glass furnaces. This table appears to have been selectively populated with data intended to suggest a lower emission limit as RACT.

275. For example, Table 7 twice identifies an SO_2 limit for the Owens-Brockway facility located in Vernon, California. Under "State and Local Emission Standards" and "BACT Determinations," the Table identifies the 0.03 lbs/ton BARCT (i.e., not BACT) figure even though that figure is part of the South Coast Air Quality Management District's RECLAIM program, which is a market-based program involving allocations of emission allowances to individual sources. Although the 0.03 lbs/ton figure is relevant to the RECLAIM program, the actual permitted SO_2 emission limits for the Vernon facility are 3.15 lbs/ton at Furnace B and 2.4 lbs/ton at Furnace C.

276. For many glass furnaces, BACT has been defined as process controls, mainly relying on salt cake limitations to reduce the input of sulfur to the process of glass making and thus

limiting the emissions of sulfur from the process. The proposed RACT Order is going well beyond past precedents for BACT and RACT.

277. In terms of past BACT determinations listed in Table 7 for existing facilities, the past two BACT precedents are listed at 1.6 and 2.0 lbs/ton for SO_2, which are significantly higher than the currently proposed 0.50 lbs/ton at Seattle.

278. The San Joaquin Valley APCD has an SO_2 regulation (in the form of District Rule 4354) that specifies 1.1 lbs/ton based on a 30-day rolling average. This is roughly double the 0.5 lbs/ton RACT limit currently proposed by PSCAA.

279. The San Joaquin Valley APCD has a PM_{10} regulation (in the form of District Rule 4354) that specifies a 0.50 lbs/ton limit. Thus, PSCAA is proposing a PM RACT standard that is less than half the PM_{10} limit imposed by the San Joaquin Valley APCD.

280. The San Joaquin Valley APCD rules are notable because the San Joaquin Valley is classified as nonattainment for multiple particulate NAAQS as well as ozone, and has been classified in nonattainment for decades, e.g., NSR permitting triggers LAER controls instead of BACT. While the San Joaquin Valley is a chronic nonattainment area for particulate (for which SO_2 is a precursor) as well as ozone, the entirety of the PSCAA jurisdiction is measuring in attainment for every one of the NAAQS. Despite this gaping disparity in ambient air quality, PSCAA's proposed RACT limits are a fraction of those imposed by the San Joaquin Valley as Air District.

281. AGI is not arguing for adoption of these higher BACT limits, but is pointing out that if reasonable limits for BACT level controls were taken into account in calculating emission reductions, the cost effectiveness value would far exceed any reasonable threshold defining what is and is not cost-effective for Seattle Furnaces #2 and #3.

282. The PM limit proposed by PSCAA is more stringent than any limit defined as BACT for a glass melting furnace by USEPA.

283. Even before correcting the myriad problems in PSCAA's cost-effectiveness analysis, the cost figures currently generated for the one available technology evaluated (i.e., baghouse+dry scrubber) are still higher than what is typically considered RACT or in some cases the more stringent BACT. For example, cost effectiveness values of less than $5,000 per ton were used to reject a dry ESP+dry scrubber controls for PM and SO_2 as BACT at glass furnaces permitted under the PSD program (requiring BACT) in New York, Kentucky, North Carolina, and Iowa.

284. When complete and corrected cost figures are used, the proposed RACT Order well exceeds other RACT guidelines for cost effectiveness, including the $10,000/ton upper boundary mentioned in the PSCAA report.

285. RACT under Washington law was clarified by the state Pollution Control Hearings Board ("PCHB") and the state Court of Appeals when they decided *Bowers v. PCHB*, 144 Wn. App

587, 13 P.3d 1076 (2000). These decisions represent binding precedent for RACT orders in Washington like this one.

286. In the *Bowers* cases, a potential RACT requirement resulting in $1,200/ton of SO_2 removal was not cost effective according to the state PCHB or Court of Appeals.

287. The fact that a Wet ESP is not currently used by a container glass furnace is evidence that it is not "reasonably available." Similarly, CCSS, while in use at a single facility, has proven so problematic and unsustainable that the technology is no longer offered by its vendor for installation at container glass furnaces. As a result, neither of these technologies is "reasonably available" as that term is interpreted by the Washington PCHB and Court of Appeals. In particular, the PCHB stated:

> No examples were provided where environmental dispatch has been the basis for establishing a technology-based air emission limit, anywhere in the United States. There is no basis for applying environmental dispatch to a single source, such as the Centralia Plant. Weyerhaeuser, at 82 ("known available" means SWAPCA cannot make a source a "proving ground for as yet untried controlled control technology.") It is not "economically feasible" because it would in effect, require closure of the mine and/or plant.

Thus, if the proposed RACT Order is upheld, it will conflict with established state law for determining when a technology option is "reasonably available."

VIII. Various Additional Errors Appear in the PSCAA's Proposed RACT Order

288. On p.2 of the PSCAA RACT Analysis, PSCAA incorrectly states that a "continuing period of noncompliance" followed the conversion of Seattle Furnaces #2 and #3 to oxy-fuel firing. This is flatly wrong.

289. For example, Seattle Furnace #3 has complied with its PM and SO2 limits for the past seven years i.e., since the 2007 CD.

290. Similarly, Seattle Furnace #2 has complied with its SO_2 limit for the past seven years, i.e., since the 2007 CD.

291. Seattle Furnace #2 has had two discrete violations of its existing BACT limit for PM in the past three years (the limit is 0.5 lbs/ton, the two exceedances were 0.6 lbs/ton). During that same 3 year period there were 12 PM tests and the average result was 0.4 lbs/ton.

292. Most emission limits for Total PM and SO_2 at glass manufacturing facilities are stated in tenths of pounds of pollutant per ton of glass produced.

293. By proposing limits in units of hundredths of pounds per ton of glass produced, PSCAA is proposing a PM limit which is 20% more stringent than a similar standard expressed in tenths.

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Construction Cost Estimate

Date: 13-Mar-14
Project No:
Department: Engineering
Prepared by: Frakes/Stoller

Customer: Ardagh Glass Inc.
Location: Seattle, WA
Project: Fces 2 & 3 Abatement System - Rev. A

Item	Area Description	Equip / Mat'l Purchases	
		Base	Seattle
	PROCESS EQUIPMENT	$5,098,001	$213,000
	UTILITES PROCESS	$153,600	$194,150
	ELECTRICAL POWER PROCESS	$183,800	$431,000
	STRUCTURAL PROCESS	$848,170	$446,537
	SITE WORK	$70,000	$419,900
	DEMOLITION		$413,000
	ANCILLARY COST	$2,151,363	$1,246,935
	SUB-TOTALS	$8,504,934	$3,364,522

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Customer: Ardagh Glass Inc. Location: Seattle, WA

Project: Fces 2 & 3 Abatement System - Rev. A Area: Process Equipment

Item No.	Description	Qty	Unit	Material Cost Per Unit	Material Cost Total	Labor Cost Per Unit	Labor Cost Total	Total
1	Abatement System	1	Ea	$4,692,501	$4,692,501			$4,692,501
	Turnkey Engineer / Procure / Construct contract based on CerCat Technology:							
	• Reaction Chamber							
	• Ductwork - Supports							
	• Fan - Stack							
	• Cooling Air							
	• Control Building							
	• Reagent Storage Bin							
	• Controls							
	• Electrical Power							
	• Installation		EA					
	• Startup							
	• Training							
	• SS Station Frame							
	• Instrument Air							
	• Dust Collection							
	EP Dust Handling System - Included with Above							
	• Dense Phase Pneumatic Conveyor							
	• EP Dust Bin							
	• SS Station Frame							
	EP Dust Batch Delivery & Weigh System -Included with Above							
	• Bin Activator							
	• Cyclone SS							
	• Bin Vent							
	• Screw Feeder							
	• Scale Hopper							
	• Scale Load Cells - Supports							
	• Misc Chutes & Spouts							
	• Scale Hopper Vent							
	• Dust Bin SS Station Frame							
	• Filter Station Super Sack Station							
2	Dust Re-feed System	1	Lot	$120,000	$120,000	$60,000	$60,000	$180,000
3	Painting							
	Process Equipment Touch-up	1	Lot	$500	$500	$3,000	$3,000	$3,500
4	CEMS/COMS Systems							
	Porting			$400		$2,000		
	RATA Certification	1				$12,000	$12,000	$12,000
	Training					$4,000		
	Add'l Analyze, Hdwe, Comm			$101,000		$34,000		
	Refurbish Cert Exist Equip	1		$33,000	$33,000			$33,000
	Analysis Equip Relocation			$20,000		$30,000		
	CEMS Install & Trave Continuous Relocation	1		$20,000	$20,000	$20,000	$20,000	$40,000
	CEMS Building			$45,000		$5,000		
	Add'l Equip for 2 fcs to operate			$78,000				
	Archive System Data			$13,000		$3,000		
5	Furnace Pressure Control System							
	• Fces 2 & 3 - Curtains	2	Lot	$75,000	$150,000	$50,000	$100,000	$250,000
	• 2 fans and 1 of fan to operate							
6	Disposal of start up dust	1	Lot	$100,000	$100,000			$100,000
				Subtotals	$5,116,001		$195,000	
						Total - This Sheet		$5,311,001

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CONSTRUCTION COST ESTIMATE

Date: 3-Jul-13
Project No:
Department: Engineering
Prepared by: Frakes/Stoller

Customer: Ardagh Glass Inc.
Location: Seattle, WA
Project: Fces 2 & 3 Abatement System - Rev. A
Area: Utilities - Process

Item No.	Description	Qty	Unit	Material Cost Per Unit	Material Cost Total	Labor Cost Per Unit	Labor Cost Total	Total
1	Abatement City Water Supply							
	+ 2" Sch 40 Galv Pipe	100	LF	$30	$3,000	$75	$7,500	$10,500
	+ 2" Galv Fittings	1	Lot	$750	$750	$1,000	$1,000	$1,750
	+ 2" Brass Ball valves	3	Ea	$75	$225	$75	$225	$450
	+ Pipe Supports	1	Lot	$1,000	$1,000	$3,000	$3,000	$4,000
	+ Heat Trace / Insulation	100	LF	$15	$1,500	$35	$3,500	$5,000
2	Air Compressor							
	+ Air cooled rotary screw	1	Ea	$150,000	$150,000	$10,000	$10,000	$160,000
	+ 450cfm @ 120 psig, 100 HP							
	+ R Vortex XF 100 or Equal							
3	Compressed Air Conditioning / Storage System							
	+ Receiver 1500 gal ASME tank	1	Ea	$10,000	$10,000	$1,000	$1,000	$11,000
	+ Refrigerated Dryer	1	Ea	$10,000	$10,000	$1,000	$1,000	$11,000
	+ Mist Eliminator Filter Set	1	Ea	$5,000	$5,000	$500	$500	$5,500
4	Compressed Air Supply Piping							
	+ 4" Sch 40 CS Pipe	200	LF	$25	$5,000	$65	$13,000	$18,000
	+ 4" Steel Fittings (weldneck)	2	Lot	$2,000	$4,000	$4,000	$8,000	$12,000
	+ 4" Soft Seat Bfly valves	6	Ea	$100	$600	$50	$300	$900
	+ Pipe Supports	2	Lot	$1,000	$2,000	$3,000	$6,000	$8,000
	+ Misc Valves / Unions	1	Lot	$25,000	$25,000	$15,000	$15,000	$40,000
5	Dust Collection							
	Dust Collector - Pulse Jet Type	1	Ea	$8,500	$8,500	$1,000	$1,000	$9,500
	+ 1800 cfm @ 6" w.c.							
	+ Cartridge type							
	+ Cage	1	Ea	$7,500	$7,500	$1,000	$1,000	$8,500
	+ Rotovalve @ 25" w.c.							
	+ Backward curved, Angle 9							
	+ Ductwork transitions, hangers	1	Lot	$3,000	$3,000	$3,000	$3,000	$6,000
6	Plant Back up Air Feed to System							
	+ 4" Sch 40 CS Pipe	200	LF	$25	$5,000	$65	$13,000	$18,000
	+ 4" Steel Fittings (weldneck)	2	Lot	$2,000	$4,000	$4,000	$8,000	$12,000
	+ 3" Soft Seat Bfly valves	1	Ea	$100	$100	$50	$50	$150
	+ Pipe Supports	1	Lot	$1,000	$1,000	$3,000	$3,000	$4,000
7	Sanitary							
	- [illegible]		EA	$75,000		$50,000		
8	Painting							
	[illegible]	1	Lot	$500	$500	$1,000	$1,000	$1,500
				Subtotals	$247,675		$100,075	

Total - This Sheet: $347,750

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CONSTRUCTION COST ESTIMATE

Date: 3-Jul-13
Project No:
Department: Engineering
Prepared by: Frakes/Stoller

Customer: Ardagh Glass Inc.
Location: Seattle, WA
Project: Fces 2 & 3 Abatement System - Rev. A
Area: Electric Power - Process

Item No.	Description	Qty	Unit	Material Cost Per Unit	Material Cost Total	Labor Cost Per Unit	Labor Cost Total	Total
1	Main Power Substation							
	+ 500kVA transformer	1	Ea	$50,000	$50,000	$25,000	$25,000	$75,000
	+ 5KV switch		Ea	$8,000		$5,000		
	+ 480V switchgear	1	Lot	$35,000	$35,000	$10,000	$10,000	$45,000
	+ 5KV feeder from substation		Lot	$40,000		$40,000		
	+ Outdoor Gear		Lot	$20,000		$20,000		
2	Main Power Supply & Distribution							
	+ Power feed to Abatement MCC	1	EA	$54,000	$54,000	$40,000	$40,000	$94,000
	+ Power feed to Air Comp	1	EA	$6,000	$6,000	$7,000	$7,000	$13,000
3	Compressor Pwr Supply	1	Ea	$15,000	$15,000	$20,000	$20,000	$35,000
4	Abatement Area Lighting and Grounding							
	+ Metal Halide Fixture	12	Ea	$350	$4,200	$300	$3,600	$7,800
	+ Fixture Mounting	12	Ea	$100	$1,200	$300	$3,600	$4,800
	+ Conduit & Wire	1	Lot	$2,500	$2,500	$8,500	$8,500	$11,000
	+ Grounding	1	Lot	$15,000	$15,000	$15,000	$15,000	$30,000
	+ Lighting panel	1	lot	$8,000	$8,000	$2,000	$2,000	$10,000
5	Standby Generator	1	Ea	$130,000	$130,000			$130,000
	+ 500kW							
	+Diesel Engine							
6	Transfer Switch							
	+ 600 amp outdoor gear	1	Ea	$17,000	$17,000	$8,000	$8,000	$25,000
	+ Closed transition switch							
	+Wiring	1	EA	$3,000	$3,000	$5,000	$5,000	$8,000
7	Standby Power Wiring							
	+ Interconnect Gen & Switch	1	Lot	$4,000	$4,000	$2,000	$2,000	$6,000
8	Dust Recycle / Batch Systems							
	+ MCC 2 sections	1	Ea	$7,000	$7,000	$2,000	$2,000	$9,000
	+ Conduit & Wiring	1	Lot	$6,000	$6,000	$10,000	$10,000	$16,000
	+ Integration (ACSI)	1	Lot				$15,000	$15,000
9	Control Systems - Interconnection to SGCI Systems @ Main Fce Control Room							
	+ Fce & Batch Conduit& Wire	1	Lot	$7,000	$7,000	$18,000	$18,000	$25,000
	+ Telephone Conduit & Wire	300	LF	$8.00	$2,400	$9.00	$2,700	$5,100
	+ Ethernet Conduit & Cable	300	LF	$8.00	$2,400	$9.00	$2,700	$5,100
	+ Utility Supports	1	Lot			$40,000	$40,000	$40,000
10	Arc Flash							
	Coordination Study Sub Station	1	Lot			$5,000	$5,000	$5,000
				Subtotals	$369,700		$245,100	

Total - This Sheet $614,800

verallia	CONSTRUCTION COST ESTIMATE	Date 3-Jul-13 Project No Department Engineering Prepared by Frakes/Stoller

Customer Ardagh Glass Inc. Location Seattle, WA

Project Fces 2 & 3 Abatement System - Rev. A Area Structural - Process

Item No	Description	Qty	Unit	Material Cost Per Unit	Material Cost Total	Labor Cost Per Unit	Labor Cost Total	Total
1	Reagent Supply Foundations							
	+ Excavation	100	CY			$250	$25,000	$25,000
	+ Form, Rebar, Conc, Strip	80	CY	$600	$48,000	$600	$48,000	$96,000
	+ Backfill, Tamp	20	CY	$140	$2,800	$225	$4,500	$7,300
	+ Add 30% for Seattle pilings							$38,490
2	Separation Chamber Foundations							
	+ Excavation	120	CY			$300	$36,000	$36,000
	+ Form, Rebar, Conc, Strip	100	CY	$600	$60,000	$600	$60,000	$120,000
	+ Backfill, Tamp	20	CY	$140	$2,800	$225	$4,500	$7,300
	+ Add 30% for Seattle pilings							$48,990
3	Stack Foundation							
	+ Excavation	50	CY			$300	$15,000	$15,000
	+ Form, Rebar, Conc, Strip	30	CY	$600	$18,000	$600	$18,000	$36,000
	+ Backfill, Tamp	20	CY	$140	$2,800	$225	$4,500	$7,300
	+ Add 30% for Seattle pilings							$17,490
4	Fan Foundation							
	+ Excavation	75	CY			$300	$22,500	$22,500
	+ Form, Rebar, Conc, Strip	60	CY	$600	$36,000	$600	$36,000	$72,000
	+ Backfill, Tamp	15	CY	$140	$2,100	$225	$3,375	$5,475
	+ Add 30% for Seattle pilings							$29,993
5	Control Building Foundations							
	+ Excavation	30	CY			$300	$9,000	$9,000
	+ Form, Rebar, Conc, Strip	15	CY	$600	$9,000	$600	$9,000	$18,000
	+ Backfill, Tamp	15	CY	$140	$2,100	$225	$3,375	$5,475
	+ Add 30% for Seattle pilings							$9,743
6	Duct Support Foundations							
	+ Excavation, 5 supports	10	CY			$225	$2,250	$2,250
	+ Form, Rebar, Conc, Strip	7	CY	$600	$4,200	$375	$2,625	$6,825
	+ Backfill, Tamp	3	CY	$140	$420	$150	$450	$870
	+ Add 30% for Seattle pilings							$2,984
7	Standby Generator Foundation							
	+ Excavation	8	CY			$300	$2,400	$2,400
	+ Form, Rebar, Conc, Strip	5	CY	$600	$3,000	$600	$3,000	$6,000
	+ Backfill, Tamp	3	CY	$140	$420	$225	$675	$1,095
	+ Add 30% for Seattle pilings							$2,849
8	Abatement Area Misc Steel							
	+ Includes Utility Bridge	10	T	$3,000	$30,000	$4,500	$45,000	$75,000
9	Modify Cullet Bunker	1	Lot	$3,000	$3,000	$3,000	$3,000	$6,000
10	Batch Plant Dust Bin Foundations, Platforms & Supports							
	+ Excavation	10	CY			$300	$3,000	$3,000
	+ Form, Rebar, Conc, Strip	8	CY	$600	$4,800	$600	$4,800	$9,600
	+ Backfill, Tamp	2	CY	$140	$280	$225	$450	$730
	+ Saw Cut Slab for Load Feeder	8	LF			$225	$1,800	$1,800
	+ Screw Feeder Supports	1	Lot	$600	$600	$1,400	$1,400	$2,000
	+ Scale Hopper Supports	1	Lot	$600	$600	$1,400	$1,400	$2,000
	+ Divide into four dust storage bins	1	Lot	$25,000	$25,000			$25,000
	+ Switch from either bulkhead to bin	1	Lot	$75,000	$75,000	$25,000	$25,000	$100,000
	+ Switch from either bin to socket	1	Lot	$40,000	$40,000	$25,000	$25,000	$65,000
11	Civil PE Design/Certification	1	Lot			$250,000	$250,000	$250,000
12	Hazardous Waste Storage Area	1	Lot	$60,000	$60,000	$40,000	$40,000	$100,000
13	Painting / Touchup	1	Lot	$750	$750	$1,500	$1,500	$2,250
				Subtotals	$431,670		$712,500	
						Total	This Sheet	$1,294,707

verallia	CONSTRUCTION COST ESTIMATE	Date: 3-Jul-13 Project No: Department: Engineering Prepared by: Frakes/Stoller

Customer: Ardagh Glass Inc. Location: Seattle, WA

Project: Fces 2 & 3 Abatement System - Rev. A Area: Site Work

Item No.	Description	Qty	Unit	Material Cost Per Unit	Material Cost Total	Labor Cost Per Unit	Labor Cost Total	Total
1	Oil Tank							
	+ Foundations	1	Lot	$5,000 00	$5,000	$25,000	$25,000	$30,000
	+ Install 8000 gallon containment	1	Lot	$15,000 00	$15,000	$5,000	$5,000	$20,000
	+ Rough Grade / Level site		CY	$150		$100		
	+ Stone Fill		CY	$150		$100		
2	High Density Storage Racks							
	+ Racking	28	EA	$400 00	$11,200	400	$11,200	$22,400
3	Miscellaneous Guarding	40	ea	$200	$8,000	300	$12,000	$20,000
4	Pave Access Areas Next to Abatement Equipment Area	1	ea	$20,000	$20,000	30,000	$30,000	$50 000
5	Off-Site Repair/Laydown Areas							
	+ Lease warehouse/storage space 6 months	1	Lot	$60,000	$60,000			$60,000
	+ Double handling off site storage	45	Day			2,500	$112,500	$112,500
6	Off-Site Vendor Parking	1	Lot			5,000	$5,000	$5,000
7	Modify Existing Flues							
	+ Furnace 2 stack modifications	1	Lot	$30,000	$30,000	$20,000	$20,000	$50,000
	+ Furnace 3 relocate top of stack	1	Lot	$10,000	$10,000	$20,000	$20,000	$30,000
	+ Furn 3 underground flue connection	1	Lot	$50,000	$50,000	$40,000	$40,000	$90,000
				Subtotals	$209,200		$280,700	
							Total - This Sheet	$489 900

verallia

CONSTRUCTION COST ESTIMATE

Date: 3-Jul-13
Project No:
Department: Engineering
Prepared by: Frakes/Stoller

Customer: Ardagh Glass Inc.
Location: Seattle, WA
Project: Fces 2 & 3 Abatement System - Rev. A
Area: Demolition

Item No.	Description	Qty	Unit	Material Cost Per Unit	Material Cost Total	Labor Cost Per Unit	Labor Cost Total	Total
1	**Relocate Oil Tank**							
	+ Relocate Oil Tank	1	Lot			$10,000.00	$10,000.00	$10,000
	+ Demo Containment Area	1	Lot			$10,000.00	$10,000.00	$10,000
2	**Demo Oil Tank Building**							
	+ Demo Structure	1	Lot	$25,000	$25,000	$48,000	$48,000	$73,000
	+ Remove storage racks/parts	1	Lot	$1,000	$1,000	$6,000.00	$6,000	$7,000
	+ Envir/Soil Testing	1	Lot			$30,000	$30,000	$30,000
	+ Abate Contaminated Soil	1	Lot			$100,000	$100,000	$100,000
3	**Demo Furn 3 stack base**							
	+ Remove bottom existing stack	1	Lot	$10,000.00	$10,000	$25,000	$25,000	$35,000
	+ Cap Furn 3 stack foundation	1	Lot	$30,000.00	$30,000	$30,000	$30,000	$60,000
	+ Remove (2) induction fans/duct	1	Lot	$1,000	$1,000	$2,000	$2,000	$3,000
	+ Abate abandoned furn 3 stack	1	Lot	$30,000	$30,000	$30,000	$30,000	$60,000
4	**Remove existing outdoor sub**							
	+ Remove and dispose of transformer	1	Lot			$10,000	$10,000	$10,000
	+ Remove and dispose of switchgear	1	Lot			$10,000	$10,000	$10,000
	+ Disconnect utilities	1	Lot			$5,000	$5,000	$5,000
				Subtotals	$97,000		$316,000	
							Total - This Sheet	$413,000

verallia	Construction Cost Estimate	Date 13-Mar-14 Project No: Department Engineering Prepared by Frakes/Stoller

Customer: Ardagh Glass Inc. Location: Seattle, WA

Project: Fces 2 & 3 Abatement System - Rev. A

Item	Area Description			Equip / Mat'l Purchases	
				Base	Seattle
	ANCILLARY COSTS				
	Description	Percent	Applied to		
1	Contractor's Overhead & Profit	[illegible]	[illegible]	$252,814	$318,177
2	Construction Management Fee	5.0%	[illegible]	$63,204	$79,544
3	General Conditions of Contract	2.0%	[illegible]	$25,281	$31,818
4	Construction Equipment	[illegible]	[illegible]	$126,407	$159,089
5	Construction Permits (EPA below)	[illegible]	[illegible]	$31,768	$10,588
6	Contractor Startup Standby Labor	[illegible]	[illegible]	$63,536	$21,176
7	Freight	[illegible]	Process All Plant	$62,836	$12,847
8	Taxes	[illegible]	[illegible]	$603,589	$201,171
9	Construction Safety Management	[illegible]	[illegible]	$95,304	$31,764
10	Design Services				
	+ Preliminary Engineering Study			$75,000	
	+ Facilities	[illegible]	Base: [illegible] Seattle: [illegible]	$126,407	$211,759
	+ Process	[illegible]	[illegible]	$188,507	$38,541
	+ Procurement/Expediting	[illegible]	Process All Plant	$31,418	$6,423
	+ Construction Administration	[illegible]	[illegible]	$31,768	$10,588
	+ Startup	[illegible]	Process All Plant	$31,418	$6,423
11	Sound Study			$21,000	$9,000
12	EPA Air Permit to Operate			$70,000	$30,000
13	EPA Stack Testing			$10,500	$4,500
14	J&J Testing Services on EP Dust			$50,000	$0
			Ancillary Sub-Cost Total	$1,960,756	$1,183,408
15	Purchases/Labor			$ 6,353,571	$ 2,117,587
16	Escalation	[illegible]	[illegible]	$190,607	$63,528
	Total Ancillary Cost (minus Item 15)			$2,151,363	$1,246,935

		Cost Totals			
Area Description		Base		Seattle	
		Owner	Contractor	Owner	Contractor
Proc Equip	Proc	$ 4,824,501	$ 273,500	$ 33,000	$ 180,000
Utilities	Proc	$ 10,000	$ 143,600	$ 150,000	$ 44,150
Elec Pwr	Proc	$ 5,000	$ 178,800	$ 160,000	$ 271,000
Structure	Proc	$ 250,000	$ 598,170	$ -	$ 446,537
Site Work	Fac	$ -	$ 70,000	$ 183,700	$ 236,200
Demo	Fac	$ -	$ -	$ -	$ 413,000
Total		$ 5,089,501	$ 1,264,070	$ 526,700	$ 1,590,887
Process SubTotal		$ 5,089,501	$ 1,194,070	$ 343,000	$ 941,687
Owner+Contractor			$ 6,283,571		$ 1,284,687
All					$ 7,568,258
Facility SubTotal		$ -	$ 70,000	$ 183,700	$ 649,200
Owner+Contractor			$ 70,000		$ 832,900
All					$ 902,900
					$ 8,471,158

EXHIBIT B

A Non-Exclusive List of Key Documents Provided to PSCAA Regarding RACT at AGI's Seattle Furnaces #2 and #3

Date Submitted	Reports/Documents
8/04/10	RACT Analysis for Furnace 3
3/09/11	Letter from Pepper Hamilton to Van Slyke
9/21/12	Supplemental RACT Analysis for Furnace 2 and 3
7/23/13	Supplemental RACT Report
8/21/13	Furnace 3 CEMS Data and Color Information
2/28/14	PSCAA and SGCI TCI Comparison spreadsheet
3/27/14	3/6/14 Meeting PowerPoint Presentation

pscleanair.org
Puget Sound Clean Air Agency

MEMO

Date: October 16, 2014

To: Board of Directors
Puget Sound Clean Air Agency

Subject: Preliminary Unaudited FY14 Financial Performance

Honorable Members:

This memo outlines our preliminary unaudited financial results for the fiscal year that ended June 30, 2014 (FY14). Preliminary FY14 results show $15.4 million in revenues and $15.6 million in expenses for a small net deficit of $.1 million. This can be compared to FY14 budgeted revenues of $20.5 million, expenses of $23.0 million and a budgeted deficit (before drawing on fund balances) of $2.4 million. The timing of grant revenues and work plan expenses was the primary cause of the revenue and expense variances. Attachment A lays out the detailed revenues, expenses and fund activity for the full year of FY14 compared to the budget.

Revenues

Table 1 summarizes the key revenue variances for FY14. Total revenues were $5.1 million under budget mainly as a result of accruing $3.3 million from the FY14 budget for the Clean Cities grant back into FY13 (based on conversations with the auditor) and carrying forward into FY15 about $2.8 million in grant and contract revenues. These revenue underruns were partially offset by civil penalty collections ($.6 million unbudgeted revenues) and higher fee program revenues ($.4 million).

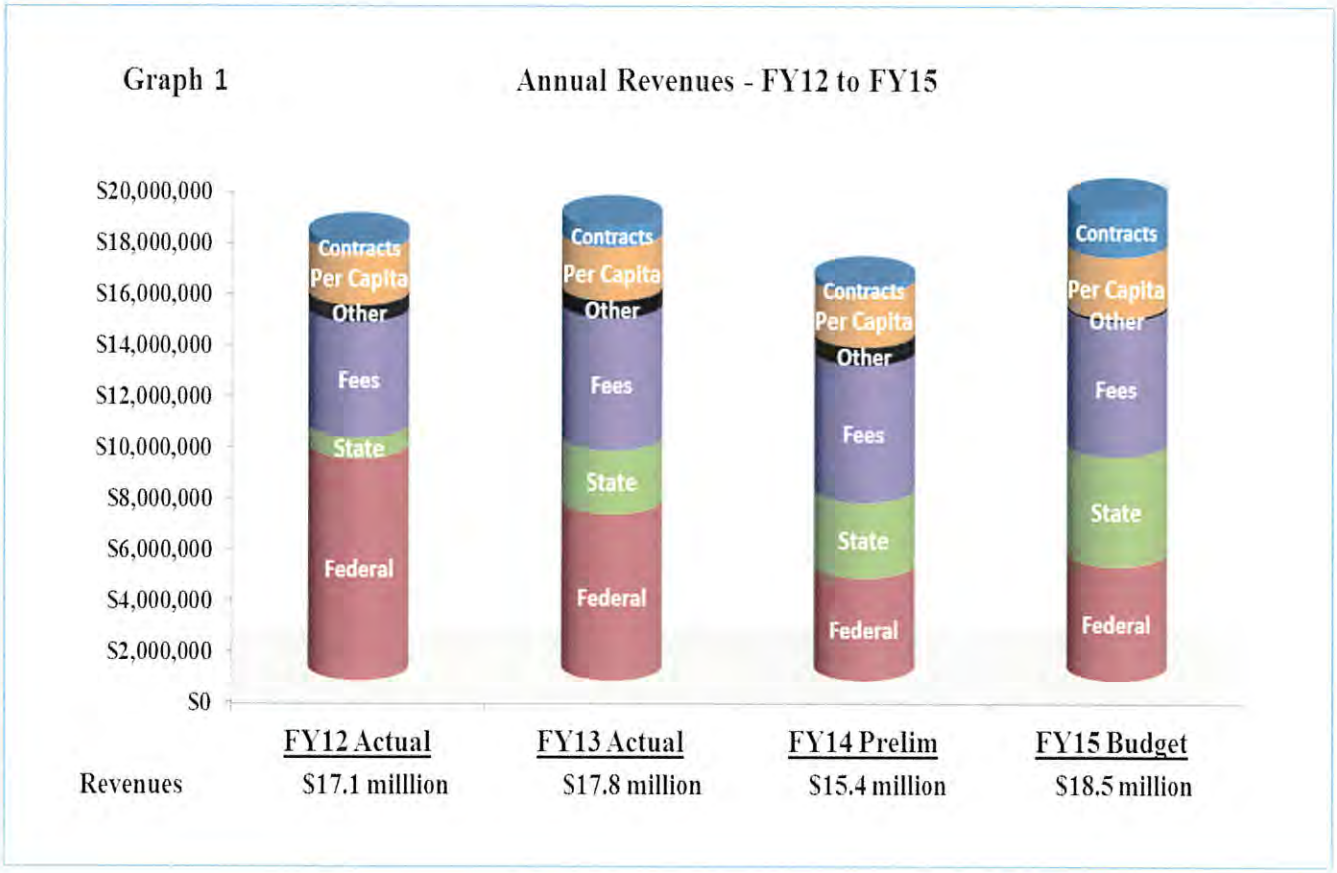
Fee program revenues exceeded budget by $.4 million due to higher permit activity in the Asbestos and Notice of Construction areas and higher registration program billings.

Table 1 - Revenues	**Preliminary FY14**		
	Actual	**Budget**	**% of Budget**
Federal Grants	$ 4,018,443	$ 8,782,082	45.8%
State Grants	2,967,274	4,436,430	66.9%
State & Local Contracts	275,907	198,591	138.9%
Supplemental Income (Per Capita)	2,095,854	2,095,856	100.0%
Fees	5,364,000	4,937,842	108.6%
Civil Penalties	595,045	-	
Interest Income	41,977	-	
Other	75,942	80,000	94.9%
Total Revenues	$ 15,434,442	$ 20,530,801	75.2%

Federal / State Grants & Contracts:

# of Recurring Grants	5
# of Non-recurring, multi-year grants & contracts	19
Total	24

Graph 1 compares revenues over the last three years and going into the FY15 budget year. While Federal grants have declined from the American Recovery and Reinvestment Act (ARRA) period, the agency has secured additional emissions reduction grants through the Department of Ecology and through contracts with the Port of Seattle. In FY15, the increased per capita revenues from the rate increase will occur in the second half of the fiscal year.



Expenses

Table 2 summarizes expenses for FY14 compared to budget. The key items were:

- Total expenses were under budget primarily due to the shift in grant-related expenses (work plan expenses) either back to FY13 or ahead to FY15 as mentioned above.
- Personnel expenses in total were under budget due to positions that were open for a partial year; however, benefits were higher due to higher than budgeted compensated absences adjustments – employees earned more vacation hours than they used.
- Operating expenses in total ran $.2 million under budget as a result of general underspending, lower consultant use, and travel and training underspending. Items that were over budget included merchant fees (higher than expected credit card payments by Operating Permit sources), rent expense (utility escalation), transportation expenses (increases in parking rates) and printing (higher activity).
- Equipment expenses were $.2 million under budget due to the deferral of tenant improvements and office equipment (noise reduction) as a result of the lease negotiations. Planned vehicle purchases for Monitoring and Inspection were deferred to and budgeted in FY15.

Table 2 - Expenses

	Preliminary FY14		
	FY14 Preliminary	FY14 Budget	% of Budget
Personnel Expenses	$ 8,470,680	$ 8,705,526	97.3%
Work Plan Expenses	5,562,764	12,298,894	45.2%
Operating Expenses	1,408,248	1,644,896	85.6%
Equipment Expenditures	136,722	309,792	44.1%
Other	(2,500)	-	
Total Expenses	$ 15,575,913	$ 22,959,108	67.8%

Funds

The budget anticipated a deficit of $2.4 million and the actual deficit for the year was $.1 million, resulting in a $2.3 million smaller net draw on fund balances. The smaller net draw on funds is explained by general underspending ($.7 million), unbudgeted revenues from civil penalties, interest income, and miscellaneous revenues ($.7 million), higher-than-budget fee revenues $.4 million), lower-than-budget fee fund draws ($.3 million) and lower-than-budget diesel fund draws ($.2 million).

Table 3 shows preliminary FY14 ending fund balances (discretionary and diesel fund) increased compared to the estimated ending balances that were used to develop the FY15 budget:

Table 3 - Fund Balances

	FY14 Ending Fund Balances		
	FY14 Ending Balances - Estimate Used for FY15 Budget Development	FY14 Ending Balances - Preliminary Actuals	Change
Per Capita (Carryover)	$ 7,000	$ 106,998	99,998
Strategic Initiatives	225,000	179,400	(45,600)
Civil Penalties	1,148,000	1,199,700	51,700
Subtotal - Discretionary	1,380,000	1,486,098	106,098
Diesel Fund	872,000	909,400	37,400
Total Discretionary & Diesel	$ 2,252,000	$ 2,395,498	$ 143,498

The increased ending discretionary fund balances of $.1 million partially funded the FY15 budget amendment that the Board considered at its September meeting.

If you have any questions, please contact me at 206.689.4004 or CraigK@pscleanair.org.

Respectfully submitted,

Craig T. Kenworthy
Executive Director

Attachment

jwc

Attachment A

Puget Sound Clean Air Agency
FY14 Consolidated Financial Performance
Fiscal Year-to-Date June 30, 2014 (preliminary unaudited financials)

	YTD June Actual	Amended Budget (June)	% of Budget	Notes
REVENUES				
Federal Grants				
Federal Core-105 Grant (EPA/Ecology)	925,982	925,982	100.0%	
PM 2.5 -Sec 103 Grant (EPA/Ecology)	83,598	94,473	88.5%	
Marine Diesel Engine Upgrade-Harley Marine (EPA)	267,797	319,028	83.9%	*Grant completed - returned underspent admin funds ($51k) to EPA*
Locomotive Engine Upgrade-Sound Transit (EPA)	1,146,655	1,152,786	99.5%	*Grant completed*
Expansion of Woodstove Removal -Attainment - PAH Grant (EPA,Ecology)	199,004	199,334	99.8%	*Grant completed*
Woodstove Retrofit Open Competition (EPA/Ecology)	21,719	102,000	21.3%	*Two-year grant terming in June 2015*
Tulalip Tribe Air Monitoring Services EPA/(Ecology)	15,323	12,429	123.3%	*Grant completed*
Liquid Natural Gas- Interstate Distributors (EPA)	28,035	200,000	14.0%	*Two-year grant terming in September 2015*
Air Emission & Energy Initiative-Island Tug and Barge (Dept of Transp. Maritime Admin)	143,357	170,284	84.2%	*Will be completed in early FY15*
Port of Seattle Trucks ScRAPS 2 Contract (CMAQ)	118,765	1,078,980	11.0%	*Federal funding portion of Port of Seattle ScRAPS 2 program - started late FY14 and will carryover in FY15*
Clean Cities Petroleum Reduction - ARRA (Dept. of Energy)	1,068,208	4,526,786	23.6%	*Grant completed - through December, $1.1 million was received for FY14 work. $3.3 million of the budget was for equipment purchases whose revenues and expenses were accrued back into FY13*
Subtotal - Federal Grants	**4,018,443**	**8,782,082**	**45.8%**	
State Grants				
State Core Grant (Ecology)	634,749	634,749	100.0%	
Port of Seattle Idle Reduction (Ecology)	191,728	218,057	87.9%	*Completed*
Port of Tacoma Idle Reduction (Ecology)	50,879	75,541	67.4%	*Completed*
Clean Diesel Grant-DPF Retrofits-Port of Tacoma (Ecology)	137,915	137,915	100.0%	*Completed*
Washington United Terminals DPF Replacement (Ecology)	49,718	49,718	100.0%	*Completed*
Harbor Craft Auxilary Engine Replacement (Ecology)	6,372	100,000	6.4%	*Will carry over into FY15*
Emergency Response Vehicle Idle Reduction (Ecology)	880,106	1,319,425	66.7%	*Will carry over into FY15*
Liquid Natural Gas - Interstate Distributors Grant Match (Ecology)	-	200,000	0.0%	*Two-year grant terming in September 2015*
Port of Seattle Trucks ScRAPS 2 Contract (Ecology)	16,797	152,600		*Ecology funding portion of Port of Seattle ScRAPS 2 program - started late FY14 and will carryover in FY15*
FY14 Wood Smoke Reduction for At-Risk Communities-Tacoma (Ecology)	535,407	1,091,000	49.1%	*Carryover the balance to FY15*
FY13 Wood Smoke Reduction in Tacoma-Pierce Nonattainment Area (Ecology)	381,179	375,000	101.6%	*Completed*
Wood Stove Educ. & Enforcement (Ecol.)	82,425	82,425	100.0%	
Subtotal - State Grants	**2,967,274**	**4,436,430**	**66.9%**	
State and Local Contracts				
Northwest Clean Air Agency Monitoring Assistance	27,926	30,171	92.6%	*Contract for monitoring support provided by the agency to the NWCAA*
Port of Seattle Trucks ScRAPS 2 Contract (Match)	18,538	168,420	11.0%	*Port's match portion of Port of Seattle ScRAPS 2 program - started late FY14 and will carryover in FY15*
Port of Seattle (Compressed Natural Gas)	105,378			
Port of Seattle Trucks ScRAPS 2 (CMAQ Start Up)	12,741			
Port of Seattle Trucks ScRAPS 2 (DERA Start Up)	14,218			
Port of Seattle Cargo Handling Retrofit	97,105			
Subtotal - State and Local Contracts	**275,907**	**198,591**	**103.6%**	
Per Capita - Cities and Counties	1,908,726	1,908,726	100.0%	
Per Capita - Strategic Initiatives	187,128	187,130	100.0%	
Subtotal - Supplemental Income	**2,095,854**	**2,095,856**	100.0%	*On budget*
Program Fees				
Asbestos	534,070	493,233	108.3%	*Slightly ahead of budget at fiscal year end*
Notice of Construction	506,514	311,314	162.7%	*Ahead of budget - higher permitting activity*
Registration	2,783,736	2,563,152	108.6%	*Slightly ahead of budget at fiscal year end*
Operating Permits	1,539,680	1,570,143	98.1%	*Close to budget estimate*
Subtotal - Program Fees	**5,364,000**	**4,937,842**	**108.6%**	
Other Revenues				
Civil Penalty Collections	595,045	-		*Unbudgeted*
Interest Income	41,977	-		*Unbudgeted - this is reserved in the Employer Retirement reserve*
Clean Cities Coalition	65,100	80,000	81.4%	*Sponsorships and member dues ran lower than budgeted due to transition in the program*
Miscellaneous Revenues	10,842	-		
Subtotal - Other Revenues	**712,964**	**80,000**	**891.2%**	
Total Revenues	**15,434,442**	**20,530,801**	**75.2%**	

Attachment A

Puget Sound Clean Air Agency
FY14 Consolidated Financial Performance
Fiscal Year-to-Date June 30, 2014 (preliminary unaudited financials)

	YTD June Actual	Amended Budget (June)	% of Budget	*Notes*
EXPENSES				
Salaries	6,248,542	6,531,119	95.7%	*Underspent*
Benefits	2,222,138	2,174,407	102.2%	*Leave liability adjustment was higher than estimated in the budget - employees earned about 3,300 hours more than they used in vacation*
Sub-Total Personnel Expenses	**8,470,680**	**8,705,526**	**97.3%**	
Work Plan Expenses	5,562,764	12,298,894	45.2%	*Budget underrun due to grant work carried forward into FY15 due to delays and to $3 million budgeted in FY14 but accrued back to FY13 for the Clean Cities grant; attainment enforcement costs also ran under budget*
Work Plan Expenses	**5,562,764**	**12,298,894**	**45.2%**	
Operating Supplies	48,672	58,413	83.3%	*Underspent*
Professional Services	213,478	377,520	56.5%	*Underspent*
Telephone	44,813	50,850	88.1%	*Underspent*
Postage	15,263	18,423	82.8%	*Underspent*
Meetings	4,941	6,000	82.4%	*Underspent*
Travel and Training	101,724	154,775	65.7%	*Underspent*
Transportation	49,786	49,093	101.4%	*Slightly over budget - parking rates increased*
Rent and Utilities	615,481	612,080	100.6%	*Slightly over budget - utility escalation higher than budget*
Insurance	74,757	78,750	94.9%	*Underspent*
Repairs and Maintenance	168,844	173,692	97.2%	*Underspent*
Legal Expenses	15,050	23,500	64.0%	*Underspent*
Printing	11,726	10,000	117.3%	*Over budget - higher activity than budgeted*
Merchants and Banking Charges	43,712	31,800	137.5%	*Underestimated the merchant charges for credit card payments of Operating Permit fees -offset by other underspending in operating costs*
Sub-Total Operating Expenses	**1,408,248**	**1,644,896**	**85.6%**	
Tenant Improvements	392	27,450	1.4%	*Deferred to lease negotiations in FY15*
Computer and Office	58,704	102,342	57.4%	*Underspent - noise abatement equipment purchase deferred to lease negotiations in FY15*
Fleet	-	100,000	0.0%	*Purchase of Inspection and Monitoring vehicles delayed until FY15*
Technical/Scientific	77,626	80,000	97.0%	*Underspent*
Sub-Total Equipment	**136,722**	**309,792**	**44.1%**	
TOTAL OPERATING EXPENSES	**15,578,413**	**22,959,108**	**67.9%**	
OTHER				
(Gain) Loss on Disposition of Equipment	(2,500)	-		*Sale of surplused monitoring equipment (Res No. 1271)*
Sub-Total Other	**(2,500)**	**-**		
TOTAL EXPENSES	**15,575,913**	**22,959,108**	**67.8%**	
Net Surplus (Deficit) before Fund Balance Appropriations	**(141,471)**	**(2,428,307)**		
Appropriations from (Contributions to) Fund Balances:				
Per Capita Draw - Operations	(3,301)	81,723		*Underspending in operating expenses and salaries & wages*
Per Capita Draw - Equipment Reserve	26,000	26,000		*The annual transfer to fund the equipment reserve (per financial policies)*
Per Capita Draw - Department Reserves	20,283	25,100		*The annual transfer to fund the department reserves (per financial policies)*
Strategic Initiatives - Draw	706,253	731,280		
Strategic Initiatives - Current Year Revenue	(187,128)	(33,059)		
Civil Penalties - Collections	(595,045)	-		*Unbudgeted collections*
Civil Penalties - Draw - Recurring	10,642	21,288		*Reimbursements to fire districts*
Civil Penalties - Transfers	138,522	-		*Transfer from civil penalties to fund expenses incurred in Compliance related to operating source work*
Civil Penalties - Draw - Reserves	310,920	389,483		*Draws for work plan expenditures - outreach and some attainment*
Subtotal - Discretionary Funds	427,146	1,241,815		
State Retrofit Grant Fund - Draw	128,938	283,322		*Under budget due to new grants/contracts offsetting admin costs*
Partner Contributions (Port of Seattle) - Draw	23,208	509,900		*Returned unspent funds to the Port of Seattle and replaced this with a new interlocal agreement to cover various projects with the port*
Community Odor Monitoring Project	105,169	115,933		*Completed this project and spent all funding*
Legal Department Reserve	-	25,000		
Equipment Reserve - Contribution from Per Capita	(26,000)	(26,000)		*The annual transfer to fund the equipment reserve (per financial policies)*

Attachment A

Puget Sound Clean Air Agency
FY14 Consolidated Financial Performance
Fiscal Year-to-Date June 30, 2014 (preliminary unaudited financials)

	YTD June Actual	Amended Budget (June)	% of Budget	*Notes*
Department Reserves - Contribution from Per Capita	(20,283)	(25,100)		*The annual transfer to fund the department reserves (per financial policies)*
Department Reserves - Draw	13,332	-		*Software purchases (unbudgeted) for the Technical Analysis team*
Fee Funds	(529,518)	272,958		*Fee revenues were higher than budgeted*
Clean Cities Reserves	72,529	30,479		*Higher draw due to lower sponsorships and member dues*
Employer Retirement Fund	(41,977)	-		*Interest income earned for the year was reserved in this fund per the financial policies*
Other	(11,073)	-		
Sub-Total Appropriated Fund Balance	**141,471**	**2,428,307**		
Net	**(0)**	**-**		

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Puget Sound Clean Air Agency

MEMO

Date: October 16, 2014

To: Board of Directors
Puget Sound Clean Air Agency

Subject: Strategic Plan Implementation Update – Environmental Justice

Honorable Members:

To ensure we keep you posted on progress and challenges as we implement our strategic plan, we update you on specific plan objectives on a rotating basis. This rotation will provide an opportunity for in-depth discussion on specific topics. Recall that last month we discussed Objective 1.5, "*Characterize and communicate air quality throughout the region, with the active participation of the public.*"

This month we will discuss environmental justice. Environmental justice and "highly impacted communities" are themes woven throughout multiple strategic plan Objectives, all aimed at achieving the first and third elements of the plan's long-term vision:

- All the people and natural systems in our region benefit from clean and healthy air all the time, regardless of socio-economic status or geographic location, and
- Everyone in the region plays an active role in achieving the vision.

As a reminder, the strategic plan defines "highly impacted communities" as geographic locations characterized by degraded air quality, whose residents face economic or historic barriers to participation in clean air decisions and solutions.

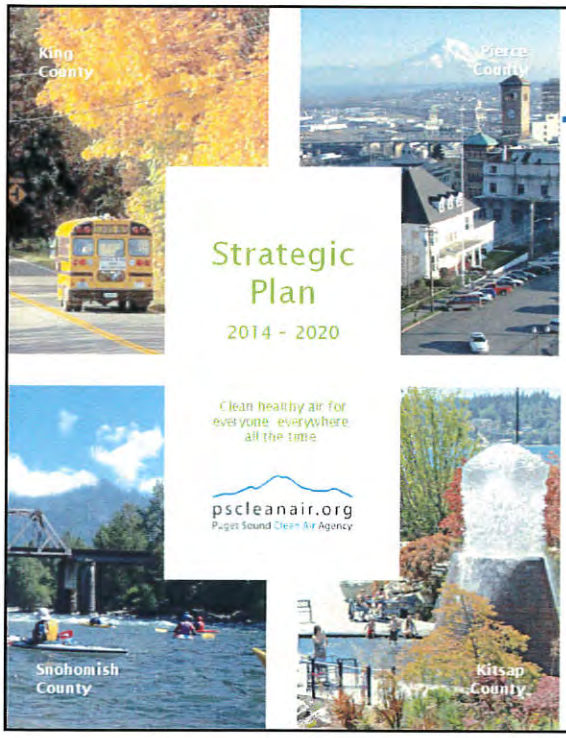
We are working to put our strategic plan words into action and challenging ourselves to change many aspects of how we plan and execute work. We look forward to discussing it with you.

Respectfully submitted,

Craig T. Kenworthy
Executive Director

Attachment

jwc



Periodic Update

Equity & Environmental Justice

Spans Multiple Objectives

October 23, 2014
Board of Directors

What We'll Cover

1. Refresher: What the plan says
2. Current Work & FY15 Deliverables
3. Challenges
4. Advisory Council input
5. Board suggestions

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Equity & EJ in the Plan

- **Vision**
  - Healthy air for everyone all the time, regardless of socio-economic status or geographic location
  - Everyone plays an active role
- **Under Goal 1: Protect public health**
  - Objective 1.6: Reduce exposure inequities
  - "Highly impacted communities" under multiple objectives
    - ✓ Transportation (1.2), wood smoke (1.3), stationary sources (1.4), characterizing air quality (1.5)
  - Space for issues raised by communities
- **Under *Excellence* Goal**
  - Objective 3.2: Integrate environmental justice & equity principles into work & decisions
  - Objective 3.3: Meaningful dialogue & outreach

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Example Strategies

Objective 1.6 **Reduce inequities in air pollution exposure**

A. **Identify** locations of greatest disparity ("**highly impacted communities**") where we can address relevant air quality concerns.

B. **Develop equity guidelines** for prioritizing where we should focus our efforts.

C. **Engage with communities** in the prioritized locations so that they are aware of the risk, and can be involved with the design of programs and policies.

D. Building on community engagement, **design and implement programs to reduce exposure and disparity**.

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Identifying Communities

1. Identify "highly impacted communities" by developing screening tool
   - South Seattle & Georgetown
     - a.k.a. "Duwamish"
   - Seattle Chinatown/International District
   - Tukwila-Allentown
2. Conduct Seattle Chinatown/International District "near-roadway" temporary monitoring study
3. Finalize version 2 of Community Air Tool (CAT) to support deeper community analysis
4. Investigate making Community Air Tool and other geo-referenced information publicly interactive on our website

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Engaging Communities

1. Begin investing in relationships with "highly impacted communities"
2. Contribute to development of Duwamish River Cleanup Coalition's (DRCC) EPA EJ Collaborative Problem Solving Agreement
3. Initiate relationships in Seattle Chinatown/International District re: temporary monitoring study
4. Initiate relationships in Tukwila-Allentown re: community-based monitoring and other outdoor air quality concerns
5. Facilitate biannual auto body regulatory workshops with technical colleges

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Engaging Communities

6. Facilitate taskforce to find the best ways to engage the public in permitting processes
7. Inventory current Agency relationships with community groups and develop relationship management tool
8. Highlight community relationships through community resource pages on Agency & partner websites
9. Participate in community-based events

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Working With Communities

1. Design community monitoring project for EPA STAR grant proposal with Tukwila-Allentown residents
2. Determine opportunities and initiate work with "highly impacted communities" on transportation, wood smoke, stationary sources or characterization
3. Conduct asbestos awareness outreach among Spanish-speaking day laborers
4. Design FY16 implementation projects to address additional air quality issues raised by communities

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Integrating Equity into Our Work

1. Launch Management leadership development workshop around equity and cultural competence
2. Establish internal equity work group and develop agency equity guidelines
3. Coordinate monthly staff professional development workshops
4. Incorporate environmental justice/equity performance expectations for managers

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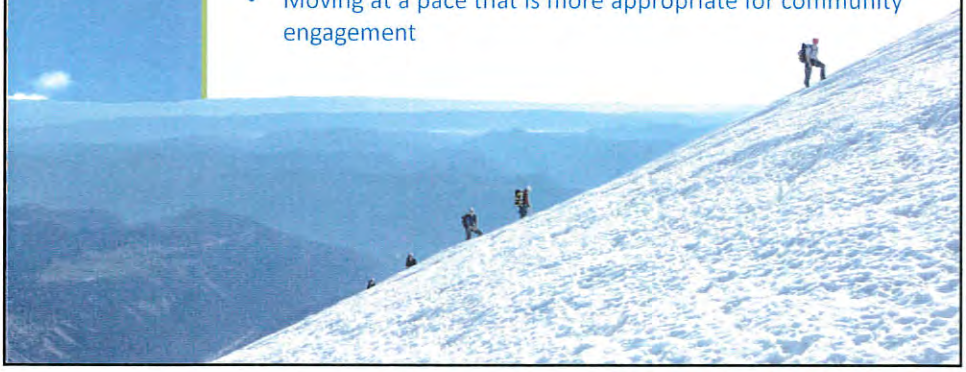
Challenges

- Unknown aspects of work scope make it difficult to allocate resources and determine specific tasks
- Nature of some work: filling gaps for communities will be critical in successful engagement (e.g. mitigation strategies and concrete incentives)
- Moving at a pace that is more appropriate for community engagement



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Advisory Council Input

- Questions around what Agency investment in equity and EJ will *look* like – accountability
- Provided suggestions for leveraging resources alongside PSRC's Transportation 2040 updates

Board Suggestions?

- Communication and outreach gaps, from your perspective?
- Community connections and resources you might recommend?
- Suggestions on how we might ensure our engagement efforts are robust and effective?

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Puget Sound Clean Air Agency

MEMO

Date: October 16, 2014

To: Board of Directors
Puget Sound Clean Air Agency

Subject: FY15 Strategic Plan Deliverables

Honorable Members:

Our 2014-2020 strategic plan includes goals, objectives and strategies for the plan's seven-year timeframe. Annual "deliverables" describe the achievements we intend to deliver each fiscal year. While these are primarily an internal management tool, you may find the complete list of FY15 Deliverables useful to understanding and tracking our implementation of the strategic plan. We also welcome your feedback and advice.

Attached please find the October 10 version of our list of FY15 Deliverables. The draft deliverables under Objectives 1.4 and 3.1 are preliminary.

Recall that we are also updating you in more depth about specific plan Objectives on a rotating basis. Last month we discussed Objective 1.5, "*Characterize and communicate air quality throughout the region, with the active participation of the public*". This month we will discuss environmental justice and additional updates are scheduled throughout the fiscal year. Later this fall, we will discuss more specific ways to report on our performance to you.

Respectfully submitted,

Craig T. Kenworthy
Executive Director

Attachment

jwc

Attachment - Draft FY15 Deliverables

Strategic Plan Strategy	#	FY15 Deliverables (October 10 Draft) *(Grey italics are cross-references to Deliverables elsewhere in the list.)*
Objective 1.1 Meet National Ambient Air Quality Standards		
A. With the Washington State Department of Ecology, secure re-designation of the Tacoma-Pierce fine particle nonattainment area to attainment status.	*1315*	*Submit redesignation request and secure approval.*
	1316	*Support Ecology public consultation re redesignation request, as needed.*
B. Track the periodic revisions to the NAAQS to understand the potential for new nonattainment areas in our region.	1101	Track ozone NAAQS process.
C. If new nonattainment areas are designated in our region (e.g. ozone) develop effective attainment plans promptly, with the participation of regional stakeholders.	1102	Analyze risk of ozone nonattainment based on proposed NAAQS and provide to PSRC and jurisdictions, along with potential action steps as appropriate.
D. Make sure gasoline vapor recovery requirements support ozone maintenance.	1103	Analyze emissions implications of Stage II vapor recovery systems.
	1104	Participate in Joint Legislative Audit & Review Committee study of gasoline vapor regulation.
E. Meet requirements of legacy maintenance plans from former nonattainment areas, including transportation conformity requirements.	1105	Submit estimated PM10 design values.
Objective 1.2 Reduce transportation emissions, especially diesel particulate, in highly impacted locations		
A. Assess harmful emissions from transportation activities and identify highly impacted locations.		
1) Inventory transportation emissions at fine geographic scale.	*1506*	*Initiate comprehensive transportation emissions inventory & scenario forecasting project (with Ecology and PSRC).*
2) Analyze opportunities and threats to reducing diesel fine particle pollution.	1201	Investigate state of rail liquified natural gas readiness.
3) Identify communities highly impacted by transportation emissions in our region.	*1601*	*Identify highly impacted communities*
B. Partner with highly impacted communities to reduce emissions and exposures.		
1) Engage with highly impacted communities to learn about their air quality priorities and apply their concerns in decision-making processes; help drive understanding of the health risks and what can be done to minimize exposure; and share resources to help communities play an active role in reducing air pollution.	*1606*	*Develop and begin investing in relationships with "highly impacted communities" (including 1 diesel and 1 wood smoke community), while bringing contextual knowledge and continually listening for other air quality issues the community is concerned about.*
2) Implement neighborhood-based projects that reduce risk from high-emitting vehicles.	1202	Complete emergency vehicle idle reduction projects with fire districts.
	1203	Complete Interstate Distributor liquified natural gas truck project.
C. Reduce emissions from maritime activities.		
1) Fulfill our commitments under the Northwest Ports Clean Air Strategy.	1204	Contribute to Northwest Ports Clean Air Strategy annual progress report.
2) Reduce emissions in highly impacted communities (e.g., dray truck emissions).	1205	Replace 240 Port of Seattle dray trucks under ScRAPS2 program.
	1206	Prepare to accept DERA and 2015 CMAQ funds for ScRAPS2 program.
	1207	Design expanded ScRAPS2 program to include Port of Tacoma.
	1208	Complete Port of Seattle natural gas truck conversion pilot project.
3) Reduce emissions from high-emitting sources over which ports and other agencies have less influence (e.g., locomotives and	1209	Replace 16 harbor vessel auxiliary engines under rebate program.
	1210	Replace engines on Duwamish tug.
D. Influence and advocate for policy and regulatory improvements.		
1) Evaluate potential for legislative, rule or policy improvements (federal, state or local) that would benefit highly impacted communities.		<none in FY15>
2) Provide information to local government and community partners on the health risks of traffic-related air pollution and near-roadway disparities to help guide their decision-making.	1211	Produce accessible summary of health risks of traffic-related air pollution and near-roadway disparities.
	1212	Determine most strategic path to disseminate information about, and raise awareness in the medical community in King and Snohomish counties about, developmental health risks of near-roadway air pollution.

Attachment - Draft FY15 Deliverables

Strategic Plan Strategy	#	FY15 Deliverables (October 10 Draft) *(Grey italics are cross-references to Deliverables elsewhere in the list.)*
Objective 1.3 Reduce emissions and exposures from wood smoke and outdoor burning		
A. Restore healthy air to the Tacoma-Pierce County nonattainment area.		
1) Actively enforce air quality burn bans.	1301	Call burn bans throughout our region.
	1302	Deploy smoke observers during burn bans.
	1303	Evaluate smoke observations, and take appropriate enforcement actions.
	1304	Evaluate and act on NOASH applications.
2) Continue incentives for the removal or replacement of uncertified, high-polluting wood stoves, including the 2015 removal requirement.	1305	Remove at least 500 uncertified wood stoves under the wood stove program, including low-income and regular replacements, and in-home and drop-off removals.
	1306	Accelerate word-of-mouth expansion of wood stove program.
	1307	Gather information and raise awareness in preparation for 2015 uncertified stove removal rule.
	1308	Seek and test wood stove aftertreatment retrofit technology.
3) Raise awareness, participation and compliance through outreach and education.	1309	Conduct timely outreach for burn bans.
	1310	Launch burn ban app.
	1311	Deliver Air On The Safe Side campaign.
	1312	Negotiate and place media advertising throughout Smoke Reduction Zone. Track and analyze placement and results.
	1313	Plan, develop and produce other SRZ collateral, materials, videos, etc.
	1314	Communicate with media re attainment.
	3303	*Continue to expand social media presence and dialogue.*
4) With Ecology, secure re-designation of the nonattainment area to attainment status.	1315	Submit redesignation request and secure approval.
	1316	Support Ecology public consultation re redesignation request, as needed.
B. Reduce wood smoke pollution in other highly impacted communities that experience unhealthy levels.		
1) Call and enforce air quality burn bans throughout our region, using enhanced techniques piloted in Tacoma/Pierce County.	*1301*	*Call burn bans throughout our region.*
	1302	*Deploy smoke observers during burn bans.*
	1303	*Evaluate smoke observations, and take appropriate enforcement actions.*
	1304	*Evaluate and act on NOASH applications.*
	1309	*Conduct timely outreach for burn bans.*
	1310	*Launch burn ban app.*
2) Identify communities with high 24-hour wood smoke levels using monitoring, modeling, or complaint analysis.	*1601*	*Identify "highly impacted communities."*
	1514	*Design and conduct additional temporary monitoring studies including winter wood smoke study(s).*
3) Engage with highly impacted communities to learn about their air quality priorities; help drive understanding of the health risks and what they can do to minimize exposure; and share resources to help them to play an active role in improving air quality.	*1606*	*Develop and begin investing in relationships with "highly impacted communities" (including 1 diesel and 1 wood smoke community), while bringing contextual knowledge and continually listening for other air quality issues the community is concerned about.*
4) Secure incentives to encourage the removal or replacement of uncertified, high-polluting wood stoves in these communities.	1317	Secure funding for wood stove program outside Tacoma/Pierce. (Ecology track & Legislature track)
	1318	If funded, plan for and extend partial wood stove program to Pierce County (outside SRZ).
5) Influence and implement cleaner federal, state or local wood heater emission standards.	1319	Track finalization of wood heater NSPS, particularly as related to wood stove emissions test method issues.
C. Minimize pollution from outdoor fires.		

Attachment - Draft FY15 Deliverables

Strategic Plan Strategy	#	FY15 Deliverables (October 10 Draft) *(Grey italics are cross-references to Deliverables elsewhere in the list.)*
1) Evaluate alternatives to outdoor burning. If warranted, develop rulemaking to reduce residential yard waste burning.	1320	Brief elected officials about reasonable alternatives to residential outdoor burning outside the Urban Growth Area.
	1321	Evaluate reasonable alternatives to residential outdoor burning outside the Urban Growth Area.
	1322	Consult stakeholders regarding reasonable alternatives to outdoor burning outside the Urban Growth Area.
2) Minimize illegal outdoor burning through education, partnering with fire districts, and enforcement.	1323	Partner with fire districts to enforce outdoor burning compliance.
	1324	Deliver outdoor burning outreach support and materials to partners as needed.
Objective 1.4 Prevent, reduce and control emissions and exposure from significant stationary sources of air pollution		
A. Prevent, reduce and control emissions and exposure by using our problem-solving approach, inspections and enforcement tools, permit reviews and conditions, and education.	1401	Complete transition to new EPA emissions reporting system, ICIS Air.
	1402	Implement new EPA policies on High Priority Violations (HPV) and Federally Reportable Violations (FRV).
B. Use appropriate tools to prevent, reduce and control emissions and exposure in a manner that is transparent and fact based, creates a level playing field, provides appropriate customer service, employs principled decision-making, engages highly impacted communities, and incorporates new information.	1403	Consider "highly impacted communities" report information in making annual inspection assignments.
	1404	Continue other current efforts.
C. Limit asbestos emissions and exposure from projects, renovations and demolitions through education, enforcement and partnerships.	1405	Develop communications strategies and policies to reduce harmful emissions after disasters.
	1406	Continue current efforts to limit asbestos emissions and exposure.
D. Control and reduce pollution from businesses activities through our registration program.	1407	Develop emission factors for commercial compost operations and communicate this information to affected facilities and others.
	1408	Request delegation for federal dry cleaners rule from EPA, and develop and implement compliance assistance program and training for dry cleaners.
	1409	Inspect facilities that may have RICE engines and determine further compliance approaches to implement federal rule.
	1410	Continue current efforts to administer registration program.
E. Identify and require appropriate emission control technologies through the new source review process.	1411	Identify and communicate regulatory requirements for marijuana facilities.
F. Implement the federal air operating permit program to regulate larger, more complex stationary sources of air pollution.	1412	Continue current efforts to implement the air operating permit program.
G. Prevent or reduce odors through permitting for control technology requirements, responding to complaints, enforcing regulations and permit conditions, and conducting studies and research to advance the understanding of odor issues.	1413	Complete follow up steps related to community odor monitoring project.
H. Build relationships, educate and engage with communities about the health risks of air quality issues of interest.	1414	Present autobody training curriculum at 2 community colleges, and extend training offer to others. Post training materials on web site.
	1415	Continue current efforts to build relationships and engage with communities, including Casa Latina/big box stores, Mexican Consulate, Spanish radio show.
I. Encourage communities to meaningfully participate in, and share feedback about, agency permitting processes.	1416	Complete stakeholder process to find the best ways to engage the public in permitting processes, and determine next implementation steps.
Objective 1.5 Characterize and communicate air quality throughout the region, with the active participation of the public		
A. Employ a variety of tools to characterize and improve our understanding of air pollution, its sources, and impacts across our four counties. Main sources of air pollution include transportation, wood smoke, and point source emissions.		
1) Review and optimize our long-term monitoring network, which measures compliance with health-based National Ambient Air Quality Standards.	1501	Monitor fine particle concentrations, and other parameters, across the region.
	1502	Track performance of Thermo 1405 TEOM fine particle monitors.

Attachment - Draft FY15 Deliverables

Strategic Plan Strategy	#	FY15 Deliverables (October 10 Draft) *(Grey italics are cross-references to Deliverables elsewhere in the list.)*
	1503	Decommission Seattle Olive St. fine particle monitoring site.
	1504	Discontinue Anacortes monitoring contract.
	1505	Discontinue Tulalip monitoring contract.
2) Use emissions inventories and models to map air pollution, estimate health effects and public health economic impact, and predict future changes.	1506	Initiate comprehensive transportation emissions inventory & scenario forecasting project (with Ecology and PSRC).
	1507	Collaborate with King County GHG inventory.
	1508	Initiate ozone scenario modeling, depending on NAAQS timeline.
	1509	Build expertise in health effects and economic impacts model analysis.
3) Broaden our knowledge of environmental impacts of air pollution (e.g. air deposition).	1510	Develop staff understanding of environmental impacts of air pollution.
	1511	Participate in Green/Duwamish Watershed Strategy
4) Identify and prioritize highly impacted communities of	*1601*	*Identify "highly impacted communities."*
5) Monitor in more places beyond our long-term trend network, using new technologies and focusing on highly impacted communities.	1512	Conduct Seattle International District "near-roadway" temporary and mobile monitoring study. Ensure residents and businesses are aware of results and potential next steps.
	1513	Conduct ozone "mini" study.
	1514	Design and conduct additional temporary monitoring studies including winter wood smoke study(s).
	1515	Design community monitoring project and Monitoring for Communities STAR grant proposal with Tukwila Allentown community.
B. Share and communicate air quality information.		
1) Forecast and communicate daily air quality, with the goal of tailoring forecasts to progressively smaller areas of our region to increase their relevancy.	1516	Report fine particle concentrations, and other parameters, across the region in annual data summary.
	1517	Report fine particle concentrations, and other parameters, across the region on website.
	1518	Forecast air quality at current spatial and temporal resolution.
	1519	Scope program of IT work to update forecasting and public air quality display tools.
2) Build relationships with highly impacted communities to learn about their air quality concerns and priorities.	*1606*	*Develop and begin investing in relationships with "highly impacted communities" (including 1 diesel and 1 wood smoke community), while bringing contextual knowledge and continually listening for other air quality issues the community is concerned about.*
	1520	Initiate relationships in Seattle International District (to engage community about measuring pollutant concentrations near roadways).
	1521	Initiate relationships in Tukwila Allentown (to engage community about measuring pollutant concentrations near roadways) and survey community.
3) Work with highly impacted communities to increase their understanding of the health risks and sources of air pollution and what they can do to minimize their risk. Facilitate community participation and feedback in air quality monitoring.	*1515*	*Design community monitoring project and Monitoring for Communities STAR grant proposal with Tukwila Allentown community.*
C. Build and leverage partnerships to pool collective knowledge and resources to deliver the strategies above.	1522	Continue to engage AIRQUEST, UW and others.
	1523	Build partnership with UW Air, Climate, Energy center (if awarded).
	1524	Build relationships with Monitoring for Communities STAR grant partners.
Objective 1.6 Reduce inequities in air pollution exposure		
A. Identify locations of greatest disparity ("highly impacted communities") where we can address relevant air quality concerns.	1601	Identify "highly impacted communities."
B. Develop equity guidelines for prioritizing where we should focus our efforts.	1602	Develop "highly impacted communities" screening tool and communicate how we intend to apply it in our work.
	1603	Finalize version 2 of Community Air Tool to support use toward different objectives.
	1604	Provide the Community Air Tool to a community in a pilot project in King County.

Attachment - Draft FY15 Deliverables

Strategic Plan Strategy	#	FY15 Deliverables (October 10 Draft) *(Grey italics are cross-references to Deliverables elsewhere in the list.)*
	1605	Investigate making Community Air Tool and other georeferenced information publicly interactive on our website.
C. Engage with communities in the prioritized locations so that they are aware of the risk, and can be involved with the design of programs and policies.	1606	Develop and begin investing in relationships with "highly impacted communities" (including 1 diesel and 1 wood smoke community), while bringing contextual knowledge and continually listening for other air quality issues the community is concerned about.
	1607	Contribute to development of Duwamish River Cleanup Coalition work program (under EPA grant).
	1520	*Initiate relationships in Seattle International District (to engage community about measuring pollutant concentrations near roadways).*
	1521	*Initiate relationships in Tukwila Allentown (to engage community about measuring pollutant concentrations near roadways) and survey community.*
D. Building on community engagement, design and implement programs to reduce exposure and disparity.	1608	Determine opportunities and initiate work with "highly impacted communities" on transportation, wood smoke, stationary sources or characterization.
	1515	*Design community monitoring project and Monitoring for Communities STAR grant proposal with Tukwila Allentown community.*
	1609	Design project(s) (for FY16 implementation) to address "other" air quality issues raised by highly impacted communities.
	1610	Initiate exposure mitigation work under Duwamish River Cleanup Coalition work program (under EPA grant).
Objective 2.1 Reduce emissions of greenhouse gases from transportation		
A. Secure the adoption of state and local carbon-reducing policies.		
1) Influence and achieve the implementation of a clean fuel standard in Washington.	2101	Track OFM evaluation of requiring cleaner transportation fuels.
	2102	Advocate for clean fuel standard.
2) Influence and achieve other policies and incentives that support investment in electric vehicles and renewable fuels.	2103	Contribute to alternative fuel vehicle rule and advisory group.
	2104	Contribute to Joint Transportation Committee sustainable EV infrastructure study.
	2105	Track and contribute as appropriate to WSDOT action plan to advance electric vehicle use.
	2106	Contribute to Ecology review of clean car law.
B. Target vehicle and infrastructure projects that accelerate regional uptake of electric vehicles and renewable fuels.		
1) Support investment in electric vehicles and renewable fuels, increase acceptance and eliminate barriers to adoption.	2107	Report against, and close, ARRA grant.
	2108	Plan and launch biodiesel initiative.
	2109	Develop biodiesel RFP with City of Seattle.
2) Educate public and private sector fleets about electric vehicles and renewable fuels in our region, sharing information and lessons learned, as appropriate.	2110	Provide technical assistance to fleets through Clean Cities Coalition.
	2111	Initiate development of local government roadmap to prepare for 2018 vehicle biofuel/electricity requirements.
	2112	Exit Evergreen Fleets program.
3) Gather consumer input and facilitate public education about electric vehicles and cleaner fuels through partnerships and community collaboration.	2113	Seek funding for CLEVR electric rental car program.
C. Inventory regional transportation greenhouse gas emissions to guide efforts and measure success.	*1506*	*Initiate comprehensive transportation emissions inventory & scenario forecasting project (with Ecology and PSRC).*
	1507	*Collaborate with King County GHG inventory.*
D. Motivate people to make more climate friendly choices through education and outreach.		<none in FY15>
E. Host and strengthen our support of the Western Washington Clean Cities Coalition.	2114	Launch new Coalition web site.
	2115	Finalize Coalition strategic plan.
	2116	Finalize annual operating plan.
	2117	Develop and implement member care plan.

Attachment - Draft FY15 Deliverables

Strategic Plan Strategy	#	FY15 Deliverables (October 10 Draft) *(Grey italics are cross-references to Deliverables elsewhere in the list.)*
	2118	Deliver several Clean Cities events, including EV charging policy at work event.
	2119	Conduct Annual General Meeting.
	2120	Secure DOE redesignation of Coalition.
F. Influence regional transportation planning to advance low-carbon transportation infrastructure and policies		
1) Advocate a climate-friendly regional growth strategy.	2121	Engage in 2018 Transportation 2040 update process; evaluate opportunities to influence.
2) Advocate strong multi-passenger vehicle, transit, bicycle and pedestrian infrastructure.	*2121*	*Engage in 2018 Transportation 2040 update process; evaluate opportunities to influence.*
3) Work with Puget Sound Regional Council and countywide forums to improve decision-making tools, models and criteria, particularly for use in selecting transportation infrastructure projects for federal funding.	2122	Work with PSRC to strengthen CMAQ project selection criteria.
	2123	Work with PSRC to improve CMAQ project emissions estimation tools.
Objective 3.1 Attract, retain and inspire exceptional staff		
A. Promote the Agency as an employer of choice in the Puget Sound region.	3101	Recruit Human Resources Manager.
	3102	Recruit 2 Communications Specialists.
	3103	Recruit Air Monitoring Specialist II.
	3104	Recruit .NET Developer (Term).
	3105	Recruit other positions as needed.
B. Use the full range of financial and workplace motivators to attract and retain quality staff.	3106	At the Board's direction, conduct salary survey for Executive Director and managers.
C. Support continuous development for every staff member, ensuring high performance and satisfaction.	3107	Continue to offer staff Career Development Tuition and Training Reimbursement Program.
D. Continue Agency policies, processes and practices that instill a culture of respect and inclusiveness for all efforts and viewpoints.	*3202*	*Provide monthly equity workshops for staff.*
E. Ensure our staff at all levels increasingly reflects the diversity of our region.	3108	Advertise recruitments broadly.
F. Develop program partnerships, fellowship and internship opportunities with institutions and organizations throughout our region.		<To be determined and scoped after HR Manager position filled.>
Objective 3.2 Develop a culture that integrates environmental justice and equity principles into our day-to-day work and decisions		
A. Establish an equity review process for agency decisions, including potential for disparate impacts or unintended consequences.		<none in FY15>
B. Develop and maintain the internal infrastructure, processes and staff development necessary to support an environmental justice and equity culture.	3201	Establish internal equity work group and develop agency equity guidelines, building on principles from 2009 internal work group.
	3202	Provide monthly equity workshops for staff.
	3203	Incorporate environmental justice/equity performance expectations for managers.
Objective 3.3 Engage in meaningful dialogue and outreach with all sectors of the public		
A. Develop and continually enhance outreach tools (e.g., website, social media) to improve user interface and information accessibility and transparency, for the public and staff.	3301	Launch redesigned agency website.
	3302	Deliver phase II of agency website redesign.
	3303	Continue to expand social media presence and dialogue.
	3304	Increase targeted use of survey tool in enhanced outreach to create dialogue.
	1310	*Launch burn ban app.*
	3305	Chair NACAA Public Education & Outreach Committee
B. Broaden our community connections by building new, and strengthening existing relationships with partner organizations and involving them in our outreach.	3306	Inventory current Agency relationships with community groups and develop relationship management tool.
	3307	Select three organizations for developing partnership and involving in our outreach.
	3308	Develop plan to continue outreach to identified partners to keep them in touch with our actions and increase awareness.

Attachment - Draft FY15 Deliverables

Strategic Plan Strategy	#	FY15 Deliverables (October 10 Draft) *(Grey italics are cross-references to Deliverables elsewhere in the list.)*
	3309	Highlight community relationships in our outreach through community resource pages on our website.
C. Proactively reach out to communities by scheduling at least two presentations per county per year to schools, chambers of commerce, service clubs or other organizations.	3310	Deliver at least two presentations per county.
	3311	Participate in community-based events, both related to health & climate objectives and to raise visibility and awareness of agency.
D. Actively seek out local media coverage of air quality issues.		<none in FY15>
E. Engage and solicit input from community members and stakeholders in active dialogue on regional air quality and pollution prevention. Use tools that allow ease of stakeholder input and facilitate information incorporation into Agency decision making as appropriate.	*3303*	*Continue to expand social media presence and dialogue.*
	3312	Use and develop appropriate tools to enhance dialogue with public. Look for non-traditional ways to reach public.
	1416	*Complete stakeholder process to find the best ways to engage the public in permitting processes, and determine next implementation steps.*
F. Identify highly impacted communities and develop effective mechanisms to mutually engage with them on air quality education and issues.	*1601*	*Identify "highly impacted communities"*
	3313	Develop effective mechanisms, timing and tools to engage "highly impacted communities."
G. Respond to our public's questions and concerns with exemplary customer service.	3314	Respond to inquiries from the public.
H. Provide the public and our staff with better access to agency records by completing the transition to an online, electronic storage system.	3315	Continue adding records to, and increase functionality of, internal online records center.
Objective 3.4 Build the agency's long-term financial strength and ensure accountability		
A. Maintain and expand diverse funding sources matched to priorities.	3401	Secure 2016 per capita increase, based on demonstrating value to jurisdictions.
	3402	Provide excellent service to existing grantors
	1206	*Prepare to accept DERA and 2015 CMAQ funds for ScRAPS2 program.*
	1317	*Secure funding for wood stove program outside Tacoma/Pierce. (Ecology track & Legislature track)*
	1515	*Design community monitoring project and Monitoring for Communities STAR grant proposal with Tukwila Allentown community.*
	2113	*Seek funding for CLEVR electric rental car program.*
	3403	Convert to Ecology's EAGL grant system.
B. Maintain an appropriate level of discretionary funds to ensure flexibility, manage risks and provide for contingencies.	3404	Set target for appropriate level of discretionary funds.
	3405	Strengthen long-term financial forecasting.
C. Manage cash flows (liquidity and receivable collections).	3406	Explore potential for increasing yield in King County pool investments.
D. Maximize efficiency by continually seeking creative ways to provide the highest level of service per dollar.	3407	Rewrite timesheet software.
	3408	Implement invoice scanning and retrieval.
	3409	Convert to paperless paystubs.
	3410	Streamline payroll processes.
	3411	Review purchasing policies.
	3412	Prepare for office lease negotiations, including determining productivity-enhancing and environmentally-friendly tenant improvements.
E. Maintain credibility and confidence of the public, Board, fee payers, partners, grantors, Advisory Council, auditors and others by being accountable and transparent and by managing	3413	Attain clean audits.
	3414	Audit subrecipients.
	3415	Review compliance with purchasing & other financial policies.

Attachment - Draft FY15 Deliverables

Strategic Plan Strategy	#	FY15 Deliverables (October 10 Draft) *(Grey italics are cross-references to Deliverables elsewhere in the list.)*
expenditures well.	3416	Provide contract training for staff.
	3417	Prepare risk analysis for audit reporting.
	3418	Provide consistent, timely and meaningful financial performance reporting.
	3419	Increase participation in government finance associations.
	3420	Investigate Government Financial Officers Association's financial management model.
F. Ensure fee-based programs cover the cost of administering them.	*3405*	*Strengthen long-term financial forecasting.*
	3418	*Provide consistent, timely and meaningful financial performance reporting.*
Objective 3.5 Be a model of environmental sustainability		
A. Optimize our transportation choices to reduce emissions.	3501	Consider emissions when purchasing new vehicles.
	3502	Continue to provide transit pass to staff.
B. Reduce our use of resources such as paper, water and electricity through conservation and efficiency measures.	3503	Implement hazardous waste collection.
	3504	Investigate potential for energy and water audits.
	3409	*Convert to paperless paystubs.*
	3412	*Prepare for office lease negotiations, including determining productivity-enhancing and environmentally-friendly tenant improvements.*
C. Procure safe and environmentally friendly products.	3505	Review office supply purchasing practices for greening opportunities.
D. Find offset projects within the region to bring agency operations' net climate impact to zero.	3506	Restart annual carbon footprint calculation.
Target Quantification		
	T01	Determine 2014 diesel particulate levels in select "highly impacted communities."

pscleanair.org
Puget Sound Clean Air Agency

MEMO

Date: October 16, 2014

To: Board of Directors
Puget Sound Clean Air Agency

Subject: Tacoma/Pierce County Smoke Reduction Zone (Stove Rule) Outreach

Honorable Members:

Outreach to residents in the Tacoma/Pierce County Smoke Reduction Zone is critically important to encourage people to follow burn bans, change out old dirty stoves for cleaner heating, and be aware of the 2015 law banning the use of uncertified stoves in the area. To date, we have been successful with a targeted multi-media approach. This year, we continue to build on the messaging we've established, and take it one step farther with some humorous, yet pointed targeted television commercials. This will be the first time we've used television in the campaign. We will continue to use print, online and outdoor advertising along with an increased community presence.

We will present our print ads and video ads to the Board, and answer your questions pertaining to outreach.

Respectfully submitted,

Craig T. Kenworthy
Executive Director

Attachment

jwc

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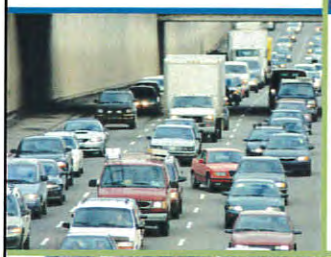
Puget Sound Clean Air Agency



AirSafe Pierce County Outreach

Kit McGurn
Board Meeting
October 23, 2014

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Puget Sound Clean Air Agency

AirSafe Pierce County Outreach

- Build on established branding – added human/humor element
- First use of targeted television ads in Smoke Reduction Zone
- Multi-media approach continues
  - Print (TNT & Puyallup Herald)
  - Outdoor
  - Online

Clean, healthy air
for everyone, everywhere,
all the time.

I'M SO OVER YOU!
YOU USED TO BE SO HOT
...NOW YOU'RE JUST DIRTY!
airsafepiercecounty.org
AIR.

I'M SO OVER YOU!
I CAN GET $1500 TO FIND A CLEANER
WAY TO KEEP WARM
airsafepiercecounty.org
AIR.

YOU'VE GOT TO GO!
SOON YOU'LL BE ON THE
WRONG SIDE OF THE LAW!
airsafepiercecounty.org
AIR.

I'M SO OVER YOU!
I CAN GET $1500 FOR A CLEANER WAY TO KEEP WARM
airsafepierecounty.org
AIR.
WE CAN HELP!

pscleanair.org
Puget Sound Clean Air Agency

MEMO

Date: October 16, 2014

To: Board of Directors
Puget Sound Clean Air Agency

Subject: Resolution No. 1311 – Disposal of Surplus Monitoring Equipment

Honorable Members:

Following the agency's property disposition policy, we periodically review assets ready for surplus. The pieces of monitoring equipment listed for disposal in Resolution No. 1311 are beyond their useful life. The aethalometer will be scavenged because the disk drive cannot be refurbished (3.5 inch floppy cannot be converted to compact flash drive). The UV DOAS equipment will be recycled responsibly as these computers no longer function, and they have been replaced with computers that do function. The old monitoring vehicle (171,000 miles), which has been replaced, is still functioning and will be sent to auction.

We will be happy to answer any questions you may have at the October Board meeting.

Respectfully submitted,

Craig T. Kenworthy
Executive Director

Attachment

jwc

RESOLUTION NO. 1311

A RESOLUTION OF THE BOARD OF DIRECTORS OF THE PUGET SOUND CLEAN AIR AGENCY APPROVING DISPOSITION AND RECYCLING OF AGENCY MONITORING AND COMPUTER EQUIPMENT

WHEREAS, the Puget Sound Clean Air Agency (Agency) currently has fully depreciated monitoring equipment and a monitoring vehicle at the end of their useful and technological life ready for disposition; and

WHEREAS, the Agency monitoring equipment listed in Exhibit A to this resolution is technologically obsolete, has no market value, pieces have broken or missing parts, and no operating systems, licenses or software, and Agency staff has determined that the equipment is of no value; and

WHEREAS, the Board desires to dispose by recycling the monitoring equipment listed in Exhibit A to this resolution in a responsible manner; and

WHEREAS, the Board desires to dispose by auction the monitoring vehicle (171,000 miles) in Exhibit A to this resolution;

BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE PUGET SOUND CLEAN AIR AGENCY:

Section 1: The Board of Directors does hereby approve the surplus and disposition of Agency monitoring equipment and monitoring vehicle as described in the list attached as Exhibit A and herein incorporated by reference, and directs that such equipment be disposed of through proper disposition methods.

PASSED AND APPROVED by the Board of Directors at a regular meeting of the Board this 23rd day of October, 2014.

PUGET SOUND CLEAN AIR AGENCY

By _____
Paul Roberts
Chair, Board of Directors

Attest:

By _____
Craig T. Kenworthy
Executive Director

Approved as to form:

By _____
Laurie S. Halvorson
Agency Counsel

Exhibit A

FY2015 Monitoring Surplus and Disposition List

MONITORING EQUIPMENT AETHALOMETER

Description	Asset S/N	Year
Magee Scientific Aethalometer	572	2003

MONITORING EQUIPMENT UV DOAS project equipment

Description	Asset S/N	Year
UV DOAS system #1	594	2004
Computer 1 (Toshiba laptop)		
UV DOAS system #2	593	2004
Computer 1 (Toshiba laptop)		

MONITORING VEHICLE

Description	Asset S/N	Year
Chevy S-10 pickup truck (171,000 miles)	31375	2003
VIN# 1GCCS19X638270840		

pscleanair.org
Puget Sound Clean Air Agency

MEMO

Date: October 16, 2014

To: Board of Directors
Puget Sound Clean Air Agency

Subject: Management Compensation System

Honorable Members:

The purpose of this memo is to briefly describe the agency's current management compensation system and recommend one minor revision to the system. As a bit of background, the current management compensation system includes a COLA adjustment to the pay ranges and individual merit-based step increases if warranted by performance. The current system has 8 steps. Employees who are at salary steps 1 – 7 and receive a "meets expectations" performance rating move through the steps and receive a merit award of 2.5%. Employees who are at salary steps 1- 7 and receive an "exceeds expectations" performance award move through the steps and receive a merit award totalling 5%. Employees at the top of the range (Step 8) are eligible for COLA and a merit award of 2.5% but the merit award is only available for an "exceeds expectations" rating and is not added to base pay – it must be taken as a lump sum payment, additional time off, an educational opportunity, or a combination thereof. All other merit awards for employees at steps 1 – 7 may be taken as an addition to base pay.

Additionally, as the Board knows through its experience this year, there is a different compensation and merit award system for the Executive Director.

Currently, approximately half of the directors, managers, and supervisors are at the top of their salary range. This means that under the current compensation system, their performance must exceed expectations to receive a merit award of any amount. My recommendation is to make a minor revision to the compensation system to allow a 2.5% merit award to any director, manager or supervisor whose performance meets or exceeds expectations for the year, to be taken as a lump sum payment, additional time off, an educational opportunity, or a combination thereof (but not added to base pay). This revision would have a minimal impact on the budget and not require an amendment to the FY15 budget.

Looking ahead, our intention is that once a Human Resources Manager is hired, the entire management compensation system will be evaluated and alternative systems or revisions to the current system will be considered and discussed with the Board.

In summary, my recommendation is that at the October Board meeting, the Board take action by motion to approve a revision to the management compensation system to allow a 2.5% merit award, to any director, manager or supervisor whose performance meets or exceeds expectations for the year, to be taken as a lump sum payment, additional time off, an educational opportunity, or a combination thereof (but not added to base pay). I am requesting this change to help maintain our competitiveness as an employer of choice.

Respectfully submitted,

Craig T. Kenworthy
Executive Director

jwc

pscleanair.org
Puget Sound Clean Air Agency

MEMO

Date: October 16, 2014

To: Board of Directors
Puget Sound Clean Air Agency

Subject: National Climate Study – Pacific Northwest Climate Impacts

Honorable Members:

As part of our Agency's Strategic Plan, we are working toward a long-term vision to do our part, and more, to protect climate and become the most climate friendly region of the country. At the October Board meeting, we will brief you on The National Climate Assessment, released earlier this year. The presentation will focus specifically on Pacific Northwest Climate Impacts and how they relate to the Agency's Strategic Plan.

Respectfully submitted,

Craig T. Kenworthy
Executive Director

Attachment

jwc

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National Climate Assessment: Pacific Northwest Impacts

Sara Harrold

Board Presentation
October 16, 2014

National Climate Assessment

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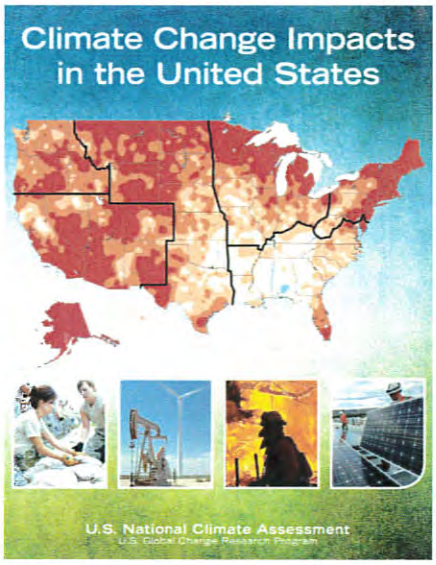

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2014-2020 Strategic Plan

Long-Term Vision for the Region's Air Quality and Climate

The strategies in this plan move the central Puget Sound region toward this vision:

- All the people and natural systems in our region benefit from clean and healthy air all the time, regardless of socio-economic status or geographic location.
- Our region does its part, and more, to protect the climate.
- Everyone in the region plays an active role in achieving this vision.

Goal Two

Become the most climate-friendly region in the United States

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Global Climate Change

Global Temperature and Carbon Dioxide

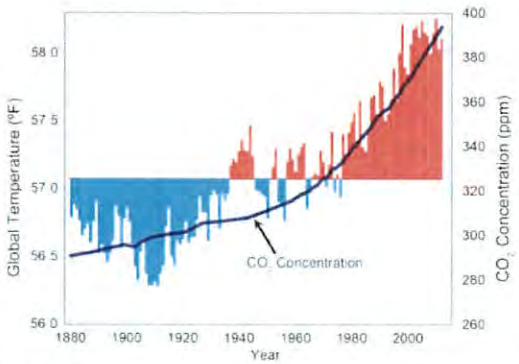

Figure 2.2. Global annual average temperature (as measured over both land and oceans) has increased by more than 1.5°F (0.8°C) since 1880 (through 2012). Red bars show temperatures above the long-term average, and blue bars indicate temperatures below the long-term average. The black line shows atmospheric carbon dioxide (CO_2) concentration in parts per million (ppm). While there is a clear long-term global warming trend, some years do not show a temperature increase relative to the previous year, and some years show greater changes than others. These year-to-year fluctuations in temperature are due to natural processes, such as the effects of El Niños, La Niñas, and volcanic eruptions. (Figure source: updated from Karl et al. 2009[1]).

US Observed Temperature Changes

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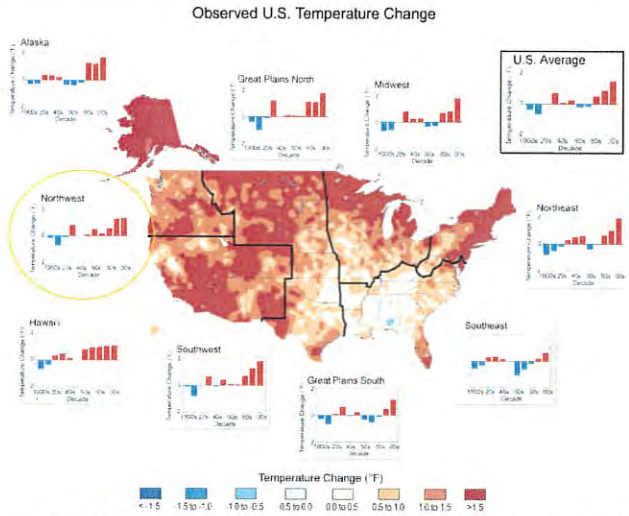

Figure 2.7. The colors on the map show temperature changes over the past 22 years (1991-2012) compared to the 1901-1960 average, and compared to the 1951-1980 average for Alaska and Hawai'i. The bars on the graphs show the average temperature changes by decade for 1901-2012 (relative to the 1901-1960 average) for each region. The far right bar in each graph (2000s decade) includes 2011 and 2012. The period from 2001 to 2012 was warmer than any previous decade in every region. (Figure source: NOAA NCDC / CICS-NC).

Pacific northwest

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Key Message 1: Water-related Challenges

Changes in the timing of streamflow related to changing snowmelt have been observed and will continue, reducing the supply of water for many competing demands and causing far-reaching ecological and socioeconomic consequences.

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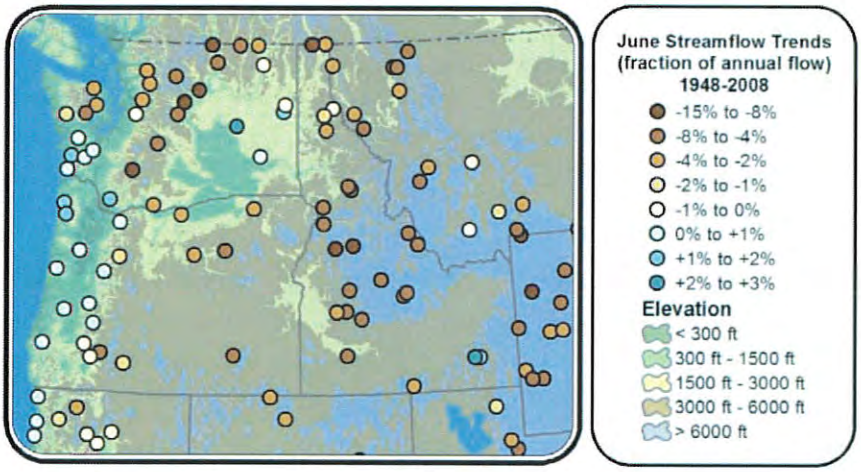
Observed Shifts in Streamflow Timing



Impacts: Water

Increased challenges for stormwater management

Increased flood risk west of the Cascades

Reduced water quality
(e.g., temp, turbidity)

Climate Impacts Group, University of Washington, www.cses.washington.edu/cig

Impacts: Water

Decreased summer hydropower production

Continued reliability of many municipal water supplies
(groundwater - unknown)

Increased stress for salmon & many coldwater ecosystems

Climate Impacts Group, University of Washington, www.cses.washington.edu/cig

Impacts: Forests

Increased wildfire risk

Increased risk of insect outbreaks

Reduced suitability for key pine species

Climate Impacts Group, University of Washington, www.cses.washington.edu/cig

Impacts: **Coasts**

Loss of land to rising seas

Increasing ocean acidity

Risks to property, public safety, coastal ecosystems

Climate Impacts Group, University of Washington, www.cses.washington.edu/cig

Impacts: **Human Health and Infrastructure**

More heat-related illness and mortality

Potential for reduced asset performance, life

Increased risk of mudslides

Climate Impacts Group, University of Washington, www.cses.washington.edu/cig

Conclusions

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Puget Sound Clean Air Agency

- Changes in the timing of streamflow will continue to reduce the supply of water and cause far-reaching ecological and socioeconomic consequences.
- Sea level rise, erosion, inundation, threats to infrastructure and habitat, and increasing ocean acidity collectively pose a major threat to the region.
- The combined impacts of increasing wildfire, insect outbreaks, and tree diseases are causing widespread tree die-off
- While the agriculture sector's technical ability to adapt can offset some adverse impacts of climate change, there remain concerns with respect to costs of adaptation and availability and timing of water.

(c) 2002 Puget Sound Clean Air Agency

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Puget Sound Clean Air Agency

MEMO

Date: October 16, 2014

To: Board of Directors
Puget Sound Clean Air Agency

Subject: Executive Director's Report

Honorable Members:

"Public discourse about climate change has resulted in the erroneous idea that it's all about cost, burden and sacrifice. If the math was correct, everyone would see it's about profit, jobs and competitive advantage". ~ Amory Lovins

More and more people are doing the math. The question is whether we'll treat this issue like investing in our house by making prudent investments to maintain or even improve its livability or behave as if it's a credit card bill we don't want to look at and leave a massive debt for those who follow us. Because the climate? It doesn't let you file for bankruptcy to get out of the obligation, but it will take your house.

Here are some of the important things we've accomplished in cleaning the air and protecting the climate over the last month:

AIR QUALITY PROGRAMS

GOAL ONE – PROTECT PUBLIC HEALTH AND THE ENVIRONMENT FROM AIR POLLUTION

Objective 1.1 – Meet National Ambient Air Quality Standards

We continued our efforts in the Tacoma/Pierce County Smoke Reduction Zone, as described below under *Objective 1.3.*

The Washington State Department of Ecology (Ecology) completed its public comment period on its request to redesignate the Tacoma/Pierce County nonattainment area and 10-year maintenance plan, and received only four comments (including ours), all of which were supportive of the request and plan. Shortly before the end of the comment period, I presented along with Ecology staff at a public hearing on the plan on September 30.

Ecology will submit the final request and maintenance plan to the U.S. Environmental Protection Agency (EPA) by the end of the month. Once approved by EPA, redesignation will change the area's status from 'nonattainment' to 'attainment/maintenance' and will remove extra requirements for certain large industrial sources and the risk of a loss of federal road funds.

Objective 1.2 – Reduce Transportation Emissions – especially diesel particulate – in highly impacted locations.

As of October 1, the ScRAPS 2 program had scrapped 35 pre-2007 dray trucks serving the Port of Seattle and replaced them with trucks that have 2007 and newer engines. It's a great start on the 180 trucks that will be replaced under this program, funded by Congestion Mitigation and Air Quality (CMAQ) and Ecology grants to the Port, along with significant Port funding. The portion of the ScRAPS 2 program funded by an EPA Diesel Emission Reduction Act (DERA) grant that we helped the Port obtain will open to truckers serving the Port of Seattle on November 3. The EPA grant will provide a higher financial incentive to 40 qualified owners to replace their older truck with one that has a 2010 or newer engine. The program already has a list of truck owners awaiting the 40 grant slots, with additional truck owners on an additional waiting list.

We submitted the final report to EPA on the Sound Transit Locomotive repower project, to close out that DERA grant. We are returning $27,732 in unneeded administrative funds to EPA for it to use on other partially funded diesel emission reduction grant projects. The two repowered locomotives will operate for the next 25 years at least 85% of their time on the south *Sounder* line, benefiting environmental justice communities and improving public health for communities in the Tacoma-Pierce County nonattainment area.

Objective 1.3 – Reduce emissions and exposures from wood smoke and outdoor burning.

Our first mobile app, Burn Ban 411, is now available for Apple devices. (It was first available on Android in July.) In addition to burn ban status, the app provides critical information related to complying with burn bans; both within the app itself and via links to pscleanair.org. Thanks to initial feedback, we created version 1.1 which included higher-visibility information about "fire safety burn bans." For a free government app, response has been favorable with over 200 installations on Android and almost 100 installations on Apple devices within the first week. Ready in time for the 2014-2015 burn ban season, we anticipate the app will greatly enhance our ability to instantaneously communicate burn ban status with users across our jurisdiction. We will continue to promote the app via social media, as well as other outreach channels. You can give the app a try yourself at www.pscleanair.org/burnban411.

As of October 8, the Tacoma-Pierce County Wood Stove Removal/Replacement Program (WSRP) has helped to remove 205 old wood stoves so far this fiscal year. Of those, 88 participants opted to recycle their old device in exchange for a reward of up to $350; 59 participants opted for the $1,500 discount toward a new heating device (but not a wood stove) in exchange for their old wood stove or insert; and 58 low-income participants opted for a free new heating replacement in exchange for their old wood stove or insert. Since the WSRP was first offered beginning in fall 2007, nearly 2,400 old wood stoves have been removed from the nonattainment area. Of those, 77% of participants used our program's incentives for a cleaner heating device while the remainder opted to simply scrap their old wood stove for a recycling reward.

In mid-September, we reached out to approximately 1,450 people who had signed up for the WSRP in the past (as far back as 2007) but had not followed through and invited them to re-enroll to take advantage of our current incentives to get ahead of the September 2015 uncertified stove removal rule. Of the 161 new enrollments to the WSRP from September 1 – October 8, 57 were from this group of previous enrollees of which 10 have already completed or scheduled a replacement or recycling project.

We launched the Woodstove Retrofit Open Challenge through the online platform InnoCentive, Inc. The challenge will solicit new or emerging technologies that can be applied to existing woodstoves to

reduce PAH and $PM_{2.5}$ emissions. The challenge will be open through November 21. The three best submissions will be eligible for performance testing in an EPA accredited laboratory.

Objective 1.5 – Characterize and communicate air quality throughout the region, with the active participation of the public.

We completed data collection for our near-road monitoring pilot in Seattle's Chinatown-International District. We're starting data analysis and will complete and share results later this fall.

We've begun scouting for monitoring sites for this season's wood smoke studies (also supporting Objective 1.3). We're currently focused on establishing temporary sites in the Auburn/Algona area. These sites will build on information from a previous winter 2012-2013 study. They will help us to better understand fine particle levels in that area, and will potentially lead to a more long-term monitoring site. We identified this area (south King County) as a forecasting 'data gap' in our FY14 monitoring network review.

We submitted an application for EPA's "Air Pollution Monitoring for Communities" grant, which seeks proposals "*empowering communities and individuals to take action to avoid air pollution exposure, using low-cost portable air pollution sensors.*" We partnered with the University of Washington in this proposal. Initial engagement with the Allentown neighborhood of Tukwila was positive– our submittal included letters of support from Allentown residents, the City of Tukwila, and the Tukwila School District. We expect EPA will make announcements regarding successful grant awards in spring 2015. Regardless of the grant award, we have expressed commitment to working with the community of Tukwila-Allentown to investigate their air quality concerns and collaborate on potential mitigation and education strategies.

GOAL TWO – BECOME THE MOST CLIMATE-FRIENDLY REGION IN THE UNITED STATES

Objective 2.1 – Reduce emissions of greenhouse gases from transportation.

We hosted an electric vehicle workplace-charging policy workshop on October 17 in Edmonds, to assist employers contemplating workplace charging. We believe that workplace charging is an important element of electric vehicle adoption and by providing education and dialogue on the topic we can reduce barriers to the provision of workplace charging.

We participated in the inaugural meeting of the Washington State Department of Commerce's Local Government Alternative Fuels and Vehicles Rulemaking Advisory Committee, which will advise the state on how to assess compliance by local governments with new rules requiring public fleets to use electricity or biofuels 'to the extent practicable,' by 2018. The rules are scheduled for adoption prior to June 1, 2015. Helping our jurisdictions address these rules is one of the deliverables in showing our value to the region and what benefits they will see from our increased per capita funding.

We also attended the Joint Transportation Committee Public Electric Vehicle Infrastructure Study. This group meets to assist the consultants in identifying business opportunities and eliminating barriers to accelerate the installation of public charging facilities for electric vehicles. And we participated in several meetings of the Pacific Coast Collaborative Zero Emission Vehicle workgroup. This group seeks to implement the actions of the Pacific Coast Action Plan on Climate and Energy, as agreed to by the governors of Washington, California and Oregon and the premier of British Columbia.

EXCELLENCE GOAL – EMPLOY THE BEST PEOPLE, POLICIES, AND PRACTICES TO ACHIEVE OUR WORK

Objective 3.4 – Build the agency's long-term financial strength and ensure accountability.

Preparation work for our annual audit will continue into November. Focus areas are on grant compliance, internal controls and appropriate financial reporting.

In September, we received approval for our new indirect rate from EPA. The current approved rate is 59.9%, down slightly from the year before (61.42%) due to increased direct labor relative to indirect costs. This rate ensures that, when we undertake grant work, the agency recoups appropriate indirect and overhead costs.

COMPLIANCE-LEGAL *(Strategic Plan Objective 1.4)*

Awarded EPA Grant for Infrared Camera – We recently received notice from EPA that our joint grant application, submitted with the Northwest Clean Air Agency, to receive an infrared (IR) camera was approved. In addition to owning the camera, the grant includes training for agency staff to become certified in using the camera. The camera could be used to allow the agencies to identify emissions/leaks that were invisible to the eye or difficult to detect at a variety of sources in different communities, leading to more effective follow up discussions with sources about potential compliance issues and resolutions to address detected problems. (The infrared camera is not for burn ban enforcement purposes.) We are currently working with EPA on the grant administration details, and will soon be working with NWCAA to develop a joint plan to start using the camera.

Conversion of EPA Reporting Systems – For the past year, agency compliance and IT resources have been actively engaged in discussions and implementation of the new EPA reporting system ICIS-Air. ICIS-Air replaces the legacy AFS system that has been in place for several decades. This is a major change in how certain compliance information is reported by state and local air agencies to EPA.

The move to the ICIS system was mainly driven by the high cost to maintain AFS. However, the ICIS-Air system is vastly more complex technically and required a substantial investment of IT development resources. Therefore, one of our senior software developers, Danielle Overstreet, has been working to develop custom in-house software which enables the agency to interface with the EPA ICIS system for required source emissions reporting. Although EPA mandated the change from AFS to ICIS, it did not provide funding to complete the work and has been on a very compressed time schedule. Only 18 agencies throughout the country – including our agency – will be prepared to submit data to ICIS-Air when it comes on-line in November for the first reporting. My thanks to the IT and compliance teams who put in a huge amount of work to make this happen.

Compliance Strategic Project – Compost Emission Factors – As we mentioned last month, we recently completed work to prepare a set of emission factors for green waste and food waste composting processes that accounts for the types of commercial compost operations in our jurisdiction, including significant food waste in the compost stream, use of tipping building and biofilters, and other types of composting beyond windrows, as well as their associated control technologies. Given that there is limited awareness and use of VOC emission factors in the state of Washington for commercial composting operations, the agency appreciates the need to communicate this information to others who are affected and/or may have an interest. As a result of this work, we

have communicated with the affected compost facilities in our jurisdiction and are starting discussions with them about the implications of this information. We will continue to update the Board on this work.

HUMAN RESOURCES

The Human Resources Manager recruitment is now underway, and the job announcement has been posted. Here is a link to the announcement: www.cpshr.us/documents/ExecSearch/HRM_PSCAA.pdf. The announcement has been posted in a wide variety of sources and the recruiter is working to develop a diverse pool of candidates. The recruitment is open until November 7, 2014, then selection of candidates for further consideration will happen, and final interviews are tentatively scheduled for early December. We ask that you circulate it to appropriate contacts and candidates.

The agency is working with its compensation consultant to conduct a salary survey for the Executive Director and other management positions. The survey will take approximately 45 – 60 days to complete, and results will be shared with the Board.

Following the usual timeframe and processes, the agency is preparing for open enrollment during November.

ENVIRONMENTAL JUSTICE

Our time with community members promotes agency work along with communicating valuable air quality information. We continue to participate in opportunities to educate and inform residents of air quality health impacts and tips for reducing exposure. The most recent health and safety fair was at Grace Community Church in Auburn. Upcoming events include health and safety fairs at Nikkei Concerns in Seattle, focused around intergenerational Asian families, and at Seattle St. Mary's Church and St. Elizabeth's Church in Bothell, connecting with Latino families in our region.

Inspectors Wellington Troncoso and Jessica Landkrohn facilitated an auto body regulatory workshop for about forty (40) students at Bates Technical College in late September. The students were engaged and the instructors appreciated the opportunity to learn about business and regulatory basics that have business and health impacts. Based on basic assessment tests we provided, we also believe we are adding value to the students' knowledge base in this industry. We anticipate working with South Seattle College for a similar workshop in the spring of 2015.

The agency has been partnering for the last three months with Casa Latina on its Latino Day Labor Workforce efforts. This has involved agency inspectors bringing asbestos information to the places where the day labor workforce gathers, in particular, areas near home improvement centers such as Home Depot and Lowes. These efforts have been well received by the day laborers. We are currently evaluating our efforts and discussing the next steps going forward.

The pilot monitoring study in the Chinatown/International District concluded in late September. We look forward to following up with various community members to share what we learned and discuss what this could tell us regarding next steps.

The agency continues with its monthly Equity Workshop Series, designed to provide internal staff development opportunities. In September, our guest was Environmental Coalition of South Seattle (ECOSS) Executive Director, Kevin Burrell. He shared information about ECOSS' successes

partnering with government agencies, as well as lessons learned from those opportunities. Also, as part of continuing internal dialogue around how we're prioritizing equity and environmental justice principles, the agency's management team will begin a six-month leadership development series with Heidi Schillinger of Equity Matters. The series is intended to help managers understand inequity and develop tools and skills toward effective strategic plan implementation.

Finally, the agency is in the process of finalizing candidates for the EJ Associate position (temporary, part time) to fill in during Tania's leave of absence. A decision will likely be made by mid-October, with onboarding to begin by the end of October.

GENERAL

Laurie Halverson and I will attend the fall NACAA meeting in Denver on October 19-22. I am on a panel discussing wood smoke reduction strategies and will present on our uncertified wood stove removal program.

I discussed the idea of having fewer, but slightly longer meetings with the Advisory Council at their most recent meeting. They were all in favor of the concept and I'll ask for any input you have at the October meeting.

Respectfully submitted,

Craig T. Kenworthy
Executive Director

jwc

PUGET SOUND CLEAN AIR AGENCY

NOTICES OF CONSTRUCTION/NOTIFICATIONS SEPTEMBER 2014

	King	Kitsap	Pierce	Snohomish	Mobile	Total
Approved	5	1	1	4	0	11

Notices/Notifications Approved September 1 through September 30, 2014

Date Approved	NC#	Firm Name	Location	Equipment
Notices of Construction				
09/11/14	10780	Toray Composites	Tacoma	Three resin mixers
09/15/14	10803	Cobalt Enterprises	Granite Falls	Spray booth
09/15/14	10834	BP US Pipelines	Seattle	Butane storage tanks
09/15/14	10840	Exotic Metals	Kent	Acid etch tank replacement & modification to the existing venting system
09/17/14	10622	Puget Sound Naval Shipyard	Bremerton	Two dust collectors
09/22/14	10816	Former Phillips 66	Seattle	Modification of Approval No. 10602
09/24/14	10812	MER Equipment	Seattle	Spray booth
09/25/14	10593	Eldec Corp	Lynnwood	Nine vapor degreasers
09/30/14	10805	Boeing Commercial Airplane	Everett	Temporary rental water tube boilers
09/30/14	10837	Eldec Corp	Lynnwood	Spray booth
Notifications				
09/15/14	1022N	Hart Coffee Company	Seattle	Coffee roaster

Notices/Notifications Received September 1 through September 30, 2014

Date Received	NC#	Firm Name	Location	Equipment
Notices of Construction				
09/04/14	10832	Lafarge	Seattle	Processing jet grout spoils
09/04/14	10833	Former Mobil Station	Seattle	Soil & groundwater remediation
09/09/14	10835	Washington Medical	Seattle	Marijuana processing facility
09/12/14	10838	GCR Tires & Services	Auburn	Two tire buffers
09/12/14	10839	Arco Facility	Edmonds	Soil & groundwater remediation
09/15/14	10841	Tacoma Woodworks	Tacoma	Spray booth
09/15/14	10842	Milgard Manufacturing	Tacoma	Modification of Order of Approval No. 9461
09/22/14	10815	ICON Materials	Auburn	Modification of Order of Approval No. 9602
09/23/14	10843	Elm Coffee	Seattle	Coffee roaster
09/23/14	10844	Rainier Biogas	Enumclaw	Anaerobic manure digester
09/29/14	10845	Boeing Commercial Airplanes	Auburn	Deoxidizing Tank
Notifications				
09/02/14	1023N	Chevron	Shoreline	Stage 1 & 2 vapor recovery
09/02/14	1024N	East Main Short Stop	Auburn	Stage 2 vapor recovery
09/02/14	1025N	Northshore Utility District	Kenmore	Stage 1 vapor recovery
09/04/14	1021N	Ernie's Fuel Stop	Kent	Stage 2 vapor recovery
09/09/14	1023N	Chevron	Shoreline	Stage 1 & 2 vapor recovery
09/26/14	1028N	Orting Food Mart	Orting	Stage 1 & 2 vapor recovery
09/26/14	1029N	Clearcreek Contractors	Marysville	Portable concrete batch plant

FY15 Contract List as of 10/10/14

NUMBER	GRANT?	PROJECT MGR/ CONTACT	VENDOR/RECIPIENT	DESCRIPTION/PROJECT	START DATE	EXPIRES	AMOUNT	FUND SOURCE
2015-001	no	Kim Cole	City of Lakewood	FY15 City of Lakewood Burn Ban Patrols	TBD	TBD	TBD	Civil Penalties
2015-002	no	Kim Cole	City of Tacoma	FY15 City of Tacoma Burn Ban Patrols	08/25/14	06/30/15	Up to $35,000	Civil Penalties
2015-003	no	Kim Cole	City of University Place	FY15 City of University Place Burn Ban Patrols	TBD	TBD	TBD	Civil Penalties
2015-004	no	Kim Cole	City of Puyallup	FY15 City of Puyallup Burn Ban Patrols	TBD	TBD	TBD	Civil Penalties
2015-005	no	Kim Cole	Pierce County	FY15 Pierce County Burn Ban Patrols	TBD	TBD	TBD	Civil Penalties
2015-006	no	Charly McCreary	LexisNexis	LexisNexis Subscription FY15-FY17	7/1/2014	6/30/2017	$350 per month	TBD
2015-007	no	Scott DeWees	Port of Seattle	Engine Upgrade Pilot ILA	7/1/2014	6/30/2015	TBD	Diesel Solutions
2015-008-0 2015-008-1	U S FHA CMAQ (WSDOT), Ecology Clean Diesel, U S EPA DERA	Kathy Boucher Beth Carper	Dealer	ScRAPS 2 Dealer Partnership Template and Amendment	TBD	10/31/2015	Up to $30,000 per truck	U S FHA CMAQ (WSDOT), Ecology Clean Diesel, U S EPA DERA
2015-009	no	Tom Henchman	Cogent Communications Inc	Cogent Internet Services	7/31/2014	7/31/2017	$625 per month	N/A
2015-010	no	Maryann Renzi	Matt and Associates	Compensation and Classification Plan Consultant	7/1/2014	6/30/2017	Up to $20,000	N/A
2015-011	no	Jennifer Dold	Versoria	Time Management Coaching	6/20/2014	9/19/2014	Up to $2,800	N/A
2015-012	no	Jennifer Dold	ABC Legal Services	ABC Legal Messenger Services	7/1/2014	6/30/2015	Up to $25,000	N/A
2015-013	no	Jennifer Dold	Apex Legal Services	Apex Legal Messenger Services	7/1/2014	6/30/2015	TBD	N/A
2015-014	no	Joanna Cruse	MindMixer (Socialmentum LLC)	MindMixer Web Application	7/1/2014	TBD	TBD	N/A
2015-015	CMAQ (POS)	Kathy Boucher	Kenworth Sales Co	Kenworth Sales ScRAPS 2 Dealer Partnership	6/30/2014	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ
2015-016	no	Adam Petrusky	Seattle City Light	Seattle City Light Master Pole Attachment	TBD	TBD	TBD	N/A
2015-017 Terminated	CMAQ (POS)	Kathy Boucher	Nuss Truck and Equipment	Nuss Truck and Equipment ScRAPS 2 Dealer Partnership	Terminated 7/17/14	NA	NA	Port of Seattle CMAQ
2015-018	CMAQ (POS)	Kathy Boucher	Koolit Truck Sales Inc	Koolit Truck Sales ScRAPS 2 Dealer Partnership	7/16/2014	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ
2015-019	no	Amy Fowler	Lee Hecht Harrison LLC	Manager Skills Development Coaching	7/1/2014	3/31/2015	$4,800 to $5,100 per participating manager	N/A
2015-020	CMAQ (POS)	Kathy Boucher	SeaTac Trucks LLC	SeaTac Trucks ScRAPS 2 Dealer Partnership	7/25/2014	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ
2015-021	no	Kit McGurn	Dorey Design Group	Air Safe Pierce County Website Maintenance	8/15/2014	6/30/2015	Up to $6,500	N/A
2015-022	Yes	Beth Carper	Harbor Vessel Owner	Template for Harbor Vessel Auxilliary Engine Replacement	TBD	6/30/2018	TBD	G14000574
2015-023	CMAQ (POS)	Kathy Boucher	Istate Truck Center	Istate Truck Center ScRAPS 2 Dealer Partnership	8/6/2014	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ
2015-024	CMAQ (POS)	Kathy Boucher	Diamond Truck Sales Inc	Diamond Truck Sales ScRAPS 2 Dealer Partnership	TBD	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ
2015-025	CMAQ (POS)	Kathy Boucher	Westfall GMC Truck Inc	Westfall GMC Truck ScRAPS 2 Dealer Partnership	7/31/2014	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ
2015-026	CMAQ (POS)	Kathy Boucher	Cascadia International LLC	Cascadia International ScRAPS 2 Dealer Partnership	8/18/2014	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ
2015-027	CMAQ (POS)	Kathy Boucher	Commercial Truck Center of Virginia LLC	Commercial Truck Center of Virginia ScRAPS 2 Dealer Partnership	8/18/2014	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ
2015-028	no	Kit McGurn	Guenther Media	Air Safe Pierce County Videography Services	9/16/2014	6/30/2015	Up to $23,000	N/A
2015-029	CMAQ (POS)	Kathy Boucher	Bennett's Truck Source LLC	Bennett's Truck Source ScRAPS 2 Dealer Partnership	9/17/2014	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ
2015-030	no	Laurie Halvorson	CPS HR Consulting	Recruiting Services for Agency HR Manager	9/15/2014	6/30/2017	Up to $23,000	N/A
2015-031	no	Steve Van Slyke	Washington State Department of Ecology	Permit Engineering Support Work	9/22/2014	12/15/2014	TBD	N/A
2015-032	CMAQ (POS)	Kathy Boucher	Los Angeles Freightliner	Los Angeles Freightliner ScRAPS 2 Dealer Partnership	TBD	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ

FY15 Contract List as of 10/10/14

NUMBER	GRANT?	PROJECT MGR/ CONTACT	VENDOR/RECIPIENT	DESCRIPTION/PROJECT	START DATE	EXPIRES	AMOUNT	FUND SOURCE
2015-033	CMAQ (POS)	Kathy Boucher	Green Truck General Partner LLC	Green Truck General Partner LLC ScRAPS 2 Dealer Partnership	10/1/2014	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ
2015-034	no	Kit McGurn	Comcast Spotlight LP	Comcast Outreach for Smoke Reduction Zone	TBD	TBD	TBD	N/A
2015-035	no	Kit McGurn	Clear Channel	Clear Channel Outreach for Smoke Reduction Zone	TBD	TBD	TBD	N/A
2015-036	no	Kit McGurn	The News Tribune (TNT)	TNT Outreach for Smoke Reduction Zone	TBD	TBD	TBD	N/A
2015-037	no	Tania Tam Park	Equity Matters	Cultural Competence Skill Building for Managers and Directors	10/3/2014	5/30/2015	Up to $6,000	Strategic Initiatives
2015-038	no	Rick Hess	Roy Robinson Subaru	Vehicle Purchase	TBD	TBD	TBD	Registration Fund
2015-039	no	Jennifer Dold	Foster Pepper PLLC	Legal Services Related to Ardagh Glass	TBD	6/30/2015	TBD	N/A
2015-040	CMAQ (POS)	Kathy Boucher	Frieghtliner of NH Inc	Frieghtliner of NH ScRAPS 2 Dealer Partnership	TBD	6/30/2015	Up to $20,000 per truck	Port of Seattle CMAQ

FY14 Contract List as of 10/10/14

NUMBER	GRANT?	PROJECT MGR/ CONTACT	VENDOR/RECIPIENT	DESCRIPTION/PROJECT	START DATE	EXPIRES	AMOUNT	FUND SOURCE
2014-001	No	Kim Cole	City of Tacoma	FY14 City of Tacoma Burn Ban Patrol	10/21/13	06/30/14	Up to $35,000	Civil Penalties
2014-002	No	Kim Cole	City of University Place	FY14 City of University Place Burn Ban Patrol	9/26/2013	6/30/2014	Up to $4,000	Civil Penalties
2014-003	No	Kim Cole	City of Puyallup	FY14 City of Puyallup Burn Ban Patrol	12/17/13	06/30/14	Up to $9,000	Civil Penalties
2014-004 and 2014-004-1	No	Kim Cole	City of Lakewood	FY14 City of Lakewood Burn Ban Patrol	9/26/2013	6/30/2014	Up to $8,000	Civil Penalties
2014-005	No	Kim Cole	Pierce County	FY14 Pierce County Burn Ban Patrol	10/11/13	12/31/14	Up to $94,000	Civil Penalties
2014-006	G1300047	Scott DeWees	East Pierce Fire and Rescue	East Pierce Fire and Rescue Idle Reduction	8/20/2013	7/30/2015	TBD	Ecology Grant
2014-007	G1300047	Scott DeWees	Valley Regional Fire Authority	Valley Regional Fire Idle Reduction	8/29/2013	12/30/2015	TBD	Ecology Grant
2014-008	G1300047	Scott DeWees	West Pierce Fire and Rescue	West Pierce Fire Idle Reduction	8/20/2013	10/30/2015	TBD	Ecology Grant
2014-009	Partially funded by the Agency Core Grant	Maryann Renzi	Agreement Dynamics, Inc.	RESOLVE internet-based negotiation training session	09/02/13	11/29/2013	Up to $5,690	Agency-wide
2014-010	G1200412 and G1200413	Beth Carper	Horizon Lines LLC	Reduce diesel engine exhaust by installing idle-reduction technologies on cargo-handling equipment	11/26/13	2/28/2017	Up to $30,000	Ecology Grants
2014-011-0 2014-011-1	G1400211	Amy Warren	Tacoma-Pierce County Health Department	Tacoma-Pierce County Wood Smoke Reduction Program Customer Service Including Income-Qualifying Application Review	08/01/13	6/30/2015	Up to $100,000	G1400211
2014-012	No	Maryann Renzi	Sam Magill	Coaching and Consulting	10/18/13	1/31/2014	Up to $10,000	Agency-wide
2014-013	No	Maryann Renzi	Washington Counties Insurance Fund	FY 2014 Washington Counties Insurance Fund (WCIF) Trust Agreement Amendment and Bylaws	01/14/14	Ongoing	TBD	Agency-wide
2014-014	No	Tom Henchman	All Phase Communications	ShoreTel Telephone System Support and Maintenance	10/23/13	10/22/2016	$15,812.50	Agency-wide
2014-015-0 2014-015-1	No	Jennifer Dold	Sebris Busto James	Legal Advice Regarding Employment and Personnel Matters	09/27/13	6/30/2016	$75,000 per year	Professional Fees and Legal Reserves
2014-016	No	Matt Harper	City of Carbonado	Carbonado Temporary Air Quality Monitoring Station	10/01/13	3/31/2014	None	N/A
2014-017	CMAQ (thru Port of Seattle)	Kathy Boucher	Template	ScRAPS 2 Program - Dealer Partnership Template	04/16/14	6/30/2015	TBD	CMAQ (thru POS)
2014-018	No	Matt Harper	Eatonville School District No. 404	Eatonville Temporary Air Quality Monitoring Station	10/01/13	3/31/2014	None	N/A
2014-019	No	Matt Harper	Pierce County	Sheriff's Foothills Detachment Air Monitoring Lease	11/22/13	2/28/2014	None	N/A
2014-020	G1300047	Elizabeth Gilpin	City of Tacoma Fire Department	Emergency Vehicle Diesel Engine Idle-Reduction	7/25/2014	12/31/2016	$36,000.00	G1300047
2014-021	G1300047	Scott DeWees	Eastside Fire and Rescue (King County Fire District 10)	Emergency Vehicle Diesel Engine Idle-Reduction	10/22/2013	1/30/2016	TBD	G1300047
2014-022	G1300047	Scott DeWees	South Kitsap Fire & Rescue	Emergency Vehicle Diesel Engine Idle-Reduction	11/25/2013	1/30/2016	TBD	G1300047
2014-023	G1300047	Scott DeWees	Pierce County Fire District 16	Emergency Vehicle Diesel Engine Idle-Reduction	12/9/2013	1/30/2016	$42,399.00	G1300047
2014-024	G1300047	Scott DeWees	Granite Falls Fire Department (Snohomish County Fire District 17)	Emergency Vehicle Diesel Engine Idle-Reduction	2/26/2014	4/30/2016	TBD	G1300047
2014-025	G1300047	Elizabeth Gilpin	Oso Fire Department (Snohomish County Fire District 25)	Emergency Vehicle Diesel Engine Idle-Reduction	6/7/2014	12/31/2016	TBD	G1300047
2014-026	G1300047	Elizabeth Gilpin	Pierce County Fire District 13	Emergency Vehicle Diesel Engine Idle-Reduction	TBD	TBD	TBD	G1300047
2014-027	G1300047	Elizabeth Gilpin	Bainbridge Island Ambulance	Emergency Vehicle Diesel Engine Idle-Reduction	TBD	TBD	TBD	G1300047
2014-028	G1300047	Scott DeWees	Bainbridge Island Fire Department	Emergency Vehicle Diesel Engine Idle-Reduction	2/20/2014	4/30/2016	TBD	G1300047
2014-029	G1300047	Elizabeth Gilpin	North County Regional Fire Authority	Emergency Vehicle Diesel Engine Idle-Reduction	5/12/2014	4/30/2016	TBD	G1300047
2014-030	G1300047	Elizabeth Gilpin	Pierce County Fire District 27	Emergency Vehicle Diesel Engine Idle-Reduction	TBD	TBD	TBD	G1300047
2014-031	G1300047	Elizabeth Gilpin	King County Fire District 45	Emergency Vehicle Diesel Engine Idle-Reduction	5/2/2014	12/30/2016	TBD	G1300047
2014-032	G1300047	Elizabeth Gilpin	Snohomish County Fire District 19	Emergency Vehicle Diesel Engine Idle-Reduction	4/7/2014	12/31/2016	No exchange of funds	G1300047
2014-033	G1200455, G1200485 and G1400211	Maggie Corbin	Absolute Chimney	In-home Wood Stove Removal	11/4/2013	7/31/2014	$250 per installed device; $150 per uninstalled device	G1200455, G1200485 and G1400211
2014-034	G1200455, G1200485 and G1400211	Amy Warren	Kliemann Brothers Heating and Air Conditioning	Wood Stove Removal and Replacement	11/13/2013	7/31/2014	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211
2014-035	DE-00J81601-0	Elizabeth Gilpin	Interstate Distributor Co	Reduce diesel engine exhaust emissions in Tacoma-Pierce County Fine Particle Nonattainment area	1/21/2014	9/30/2018	up to $350,000	EPA Grant DE-00J81601-0
2014-036-0 2014-036-1	No	Joanne Todd	Buildingi (Building Information Systems LLC)	Website development and design services	1/31/2014	12/1/2014	up to $47,500	N/A
2014-037	G1200455, G1200485 and G1400211	Amy Warren	Down Right Cozy	Wood Stove Removal and Replacement	11/13/2013	7/31/2015	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211

FY14 Contract List as of 10/10/14

NUMBER	GRANT?	PROJECT MGR/ CONTACT	VENDOR/RECIPIENT	DESCRIPTION/PROJECT	START DATE	EXPIRES	AMOUNT	FUND SOURCE
2014-038	G1200455, G1200485 and G1400211	Amy Warren	Aqua Rec's Inc	Wood Stove Removal and Replacement	11/6/2013	7/31/2015	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211
2014-039	G1200455, G1200485 and G1400211	Amy Warren	A & A Wood-Pellet-Gas Stoves	Wood Stove Removal and Replacement	11/6/2013	7/31/2015	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211
2014-040	G1200455, G1200485 and G1400211	Amy Warren	All Seasons Inc	Wood Stove Removal and Replacement	11/6/2013	7/31/2015	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211
2014-041	G1200455, G1200485 and G1400211	Amy Warren	Fircrest Hearth & Home	Wood Stove Removal and Replacement	11/6/2013	7/31/2015	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211
2014-042	G1200455, G1200485 and G1400211	Amy Warren	Mercurio's Heating & Air Conditioning	Wood Stove Removal and Replacement	11/6/2013	7/31/2015	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211
2014-043	G1200455, G1200485 and G1400211	Amy Warren	Narrows Heating & Air Conditioning	Wood Stove Removal and Replacement	11/13/2013	7/31/2015	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211
2014-044	G1200455, G1200485 and G1400211	Amy Warren	Puyallup Heating and Air Conditioning	Wood Stove Removal and Replacement	11/6/2013	7/31/2015	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211
2014-045	G1200455, G1200485 and G1400211	Amy Warren	Sustainable Works	Wood Stove Removal and Replacement	11/13/2013	7/31/2015	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211
2014-046	G1200455, G1200485 and G1400211	Amy Warren	Wallace's Stove and Fireplace	Wood Stove Removal and Replacement	11/6/2013	7/31/2015	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211
2014-047	G1200455, G1200485 and G1400211	Amy Warren	Rich's for the Home	Wood Stove Removal and Replacement	11/6/2013	7/31/2015	$800 to $7,200 per replacement	G1200455, G1200485 and G1400211
2014-048	No	Andy Tudhope	Pacific Office Automation (U S Bank Equipment Finance)	Sharp Copiers Lease	4/25/2014	4/25/2018	$2,048 per month minimum base	N/A
2014-049	No	Tom Henchman	DataSite Northwest (now ACCESS Corp)	DataSite Data Storage	12/16/2013	Ongoing	Schedule	N/A
2014-050	No	Matt Harper	U S General Services Administration (GSA)	Lease GSA Federal Center South for Air Quality Monitoring	12/1/2013	11/30/2018	$425 per month $5,100 per year	N/A
2014-051	No	Maryann Renzi	Lee Hecht Harrison	Management Team Organization Development	12/6/2013	4/30/2014	up to $8,000	CMAQ and U S DOT) and G14 00386
2014-052-0 2014-052-1	Port of Seattle (CMAQ, US DOT) and Ecology G1400386	Beth Carper	Port of Seattle Seaport	ScRAPS Program to Replace Drayage Trucks	12/31/2013	10/1/2015	up to $5,595,000	Port of Seattle Seaport (through G1400386)
2014-053	No	Scott DeWees	Port of Tacoma	Port of Tacoma Engine Upgrade Pilot	TBD	TBD	TBD	Port of Tacoma
2014-054	No	Erik Saganic	Duwamish River Cleanup Coalition (DRCC)	Environmental Justice Project	2/18/2014	7/30/2016	N/A	N/A
2014-055	No	Maryann Renzi	Washington Partners Inc	Tenant Representation Services	4/29/2014	1/31/2017	N/A	N/A
2014-056	No	Maryann Renzi	Sam Magill	Communication Team Coaching	3/1/2014	5/31/2014	Up to $6,000	Per capita & core
2014-057	No	Kim Cole	International Code Council	Gas Station Tester - Installer Certification Program	3/30/2014	3/30/2017	Up to $75 per exam	N/A
2014-058	No	Mario Pedroza	City of Kenmore	Kenmore Cooperative Odor Complaint Investigations	TBD	TBD	N/A	N/A
2014-059	G1300047	Elizabeth Gilpin	South Pierce Fire and Rescue 17	Emergency Vehicle Diesel Engine Idle-Reduction	TBD	12/30/2016	TBD	G1300047
2014-060	G1300047	Elizabeth Gilpin	Central Kitsap Fire and Rescue	Emergency Vehicle Diesel Engine Idle-Reduction	4/11/2014	12/30/2016	TBD	G1300047
2014-061	N/A	Maryann Renzi	Quantum Workplace Inc	Executive Director Employee Survey 2014	5/5/2014	6/30/2014	Up to $3,000	N/A
2014-062	G1400205	Phil Swartzendruber	InnoCentive, Inc	Innocentive's Wood Stove Challenge	7/15/2014	6/30/2015	Up to $25,000	G1400205
2014-063	CMAQ (thru Port of Seattle)	Kathy Boucher	Kenworth Northwest Inc	Kenworth Northwest Dealer Partnership	05/19/14	6/30/2015	TBD	CMAQ (thru POS)
2014-064	CMAQ (thru Port of Seattle)	Kathy Boucher	Western Peterbilt Inc	Western Peterbilt Dealer Partnership	05/19/14	6/30/2015	TBD	CMAQ (thru POS)
2014-065	CMAQ (thru Port of Seattle)	Kathy Boucher	Valley Freightliner Inc	Valley Freightliner Dealer Partnership	05/19/14	6/30/2015	Up to $20,000 per truck	CMAQ (thru POS)
2014-066	CMAQ (thru Port of Seattle)	Kathy Boucher	Pacific Power Products	Pacific Power Products Dealer Partnership	05/22/14	6/30/2015	TBD	CMAQ (thru POS)
2014-067	CMAQ (thru Port of Seattle)	Kathy Boucher	Motor Trucks Inc	Motor Trucks Dealer Partnership	05/22/14	6/30/2015	TBD	CMAQ (thru POS)
2014-068	CMAQ (thru Port of Seattle)	Kathy Boucher	McCoy Freightliner	McCoy Freightliner Dealer Partnership	05/22/14	6/30/2015	TBD	CMAQ (thru POS)

FY14 Contract List as of 10/10/14

NUMBER	GRANT?	PROJECT MGR/ CONTACT	VENDOR/RECIPIENT	DESCRIPTION/PROJECT	START DATE	EXPIRES	AMOUNT	FUND SOURCE
2014-069	CMAQ (thru Port of Seattle)	Kathy Boucher	Pape' Kenworth	Pape' Kenworth Dealer Partnership	05/22/14	6/30/2015	TBD	CMAQ (thru POS)
2014-070	CMAQ (thru Port of Seattle)	Kathy Boucher	Woodpecker Truck and Equipment Inc	Woodpecker Truck and Equipment Dealer Partnership	05/22/14	6/30/2015	TBD	CMAQ (thru POS)
2014-071	CMAQ (thru Port of Seattle)	Kathy Boucher	Bryant Motors	Bryant Motors Dealer Partnership	05/22/14	6/30/2015	TBD	CMAQ (thru POS)
2014-072	CMAQ (thru Port of Seattle)	Kathy Boucher	TEC Equipment	TEC Equipment Dealer Partnership	05/19/14	6/30/2015	TBD	CMAQ (thru POS)
2014-073	CMAQ (thru Port of Seattle)	Kathy Boucher	Husky International Trucks	Husky International Dealer Partnership	05/19/14	6/30/2015	TBD	CMAQ (thru POS)
2014-074	CMAQ (thru Port of Seattle)	Kathy Boucher	Don Small and Sons (The Truck Shop)	Don Small and Sons (The Truck Shop) Dealer Partnership	05/22/14	6/30/2015	TBD	CMAQ (thru POS)
2014-075	No	Maryann Renzi	King County METRO Transit	ORCA Business Passport Cards FY 2015	04/18/14	6/30/2015	TBD	N/A
2014-076	CMAQ (thru Port of Seattle)	Kathy Boucher	Seattle Iron and Metals Corp	Drayage Truck Scrappage and Replacement	06/12/14	6/30/2015	TBD	CMAQ (thru POS)
2014-077	No	Kimberley Cline	Carlos Castiblanco	Clean Cities Website Development and Design Services	05/22/14	6/30/2015	Up to $11,000	N/A
2014-078	No	Mario Pedroza	Inficon Inc	Perc Leak Detectors	08/11/14	TBD	Up to $60,000	N/A
2014-079	CMAQ (thru Port of Seattle)	Kathy Boucher	Calbag Metals Inc	Calbag Metals Truck Scrappage and Replacement	TBD	6/30/2015	TBD	CMAQ (thru POS)