

Please use the Zoom link provided in the calendar invite.

The meeting can also be attended in person at the agency's office at [1904 3<sup>rd</sup> Avenue, Suite 105, Seattle](https://www.ps-cleanair.gov).

If you have trouble accessing this, please email [Stephaniea@pscleanair.gov](mailto:Stephaniea@pscleanair.gov).

The Agency will make reasonable accommodations for any person who needs assistance to participate in the Advisory Council meeting, or to access our services. Our meeting facilities are ADA accessible. Sign language services, language translation and interpretation, and communications materials in alternative formats can be made available given sufficient notice by contacting 206-689-4069, or you may reach her by dialing 800-552-3565, ext. 4069.

1904 3rd Ave #105  
Seattle, WA 98101

206-343-8800

[pscleanair.gov](http://pscleanair.gov)

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Board Chair

**Executive Director**  
Christine Cooley

Wednesday, January 14, 2026

**ADVISORY COUNCIL MEETING AGENDA**

9:00 – 9:05	Call to order – Roll Call – Quorum Established – Land Acknowledgement: We would like to acknowledge that our Agency operates in four present-day counties, which are the traditional lands of the Coast Salish people, past and present. This acknowledgement does not take the place of authentic relationships with indigenous communities in our jurisdiction and beyond but serves as a first step in honoring the people whose land we work and reside on.
9:05-9:05	<b>I. Approval of Minutes</b> September 20, 2025
	<b>II. New Business</b>
9:05-9:35	A. Comprehensive Climate Action Plan (CCAP) Update*
9:35-10:00	B. Reasonable Alternatives to Outdoor Burning (RAOB) Outreach*
10:00- 11:00	C. Permitting 101: Knowledge Building of Core Agency Functions*
11:00 -11:10	<b>III. Staff Reports</b> A. Staff Report*
11:10-11:45	<b>IV. Advisory Council Member Reports</b>

**PUGET SOUND CLEAN AIR AGENCY  
ADVISORY COUNCIL**

**REGULAR MEETING MINUTES**

September 10<sup>th</sup>, 2025

1904 3rd Avenue, Suite 105  
Seattle, WA 98101

Note: This was a hybrid meeting via the Zoom platform and all Advisory Council members and staff were present by computer or phone or in person at 1904 3rd Ave #105, Seattle, WA 98101.

Advisory Council Members Present:

Ryan Kellogg, representing Health  
Tim Gould, representing King County Public-at-Large  
Kristin Lynett, representing Pierce County Public-at-Large  
Satwinder Kaur, representing King County Suburban Cities  
Joe Deets, representing Kitsap County Suburban Cities  
Debbie Hannig, representing Area Sources  
Kristin Marshall, representing Industry - Large  
Dan Rankin, representing Wood Smoke Communities  
Nancy Johnson, representing Suburban Cities, Snohomish County  
Yorik Stevens-Wajda, representing Planning  
Bonnie Meyer, representing Pierce County Suburban Cities  
Mia Ayala-Marshall, representing Environmental Justice - Local  
Stephanie Gowing, representing Construction  
Greg Tisdel, representing Industry Small/Medium  
Rick LaGrandeur, representing Fire Chiefs  
Jamie Hearn, representing Environmental Justice, Regional  
Peter Hasegawa, representing Labor  
Nayiri Haroutunian, representing Education

Advisory Council Members Absent:

Paulina Lopez, representing Environmental Justice - Local  
Steve Nicholas, representing Ports  
Suzy Oversvee, representing Snohomish County Public-at-Large  
Kelly McGourty, representing Transportation

Megan Larkin, representing Environment  
Charles Adkins, representing Tribal  
Ronn Griffin, representing Kitsap County Public-at-Large

## **I. Approval of Minutes**

Satwinder Kaur called the meeting to order at 9:03 a.m. and read the land acknowledgement.

Ms. Kaur announced the five new Advisory Council members and invited them to introduce themselves.

Joe Deets made a motion to approve the July 9, 2025 meeting minutes. The motion was seconded by Dan Rankin and it passed unanimously.

## **New Business**

### **II. A. Gas Station Pre-Rulemaking Stakeholder Engagement Plan & Implementation**

Ms. Kaur introduced Madeline McFerran, Compliance Engineer. Ms. McFerran delivered a presentation on the Gas Station Pre-Rulemaking Stakeholder Engagement Plan & Implementation. A PowerPoint presentation was shared.

Bonnie Meyer asked if the Agency had the chance to do one-on-one discussions with stakeholders to test the questionnaires and materials before bringing them to a larger group.

Ms. McFerran answered that the surveys for gas station owners were not pre-tested with them; instead, internal testing was done with people from different levels of the rulemaking process. The survey included free-response questions and an option for respondents to provide contact information for follow-up. The surveys were anonymous, but follow-up will occur for those who requested more information.

Kristin Marshall asked if the Agency had any survey responses from large industry.

Ms. McFerran said that the survey is anonymous, however, she does know that sites that refuel with gasoline were included, not just gas stations, and the Agency

received confirmation the survey was received.

Ms. Marshall explained that she was asking to determine whether she needed to do additional outreach.

Nayiri Haroutunian shared that the organization, ECOSS, could be a good resource because she believes they have a strong history of working with local businesses, such as immigrant- and first-generation American-owned restaurants, to support compliance with regulations despite language barriers.

Ms. Haroutunian asked if the Agency's strategy for engaging gas station owners includes using native speakers not just for translation but to visit sites, contextualize materials, and ensure owners fully understand and comply with regulations.

Executive Director Christine Cooley responded that while ECOSS could serve as a connector to businesses the Agency may not reach, the Agency prefers direct communication with stakeholders using our established translation resources.

Stephanie Gowing added, as a former ECOSS employee, that she recommends leveraging ECOSS's existing outreach efforts.

Ms. Gowing recommended creating a visual of the timeline for clarity. She also shared that a map of the impacted locations might be insightful.

Ms. Gowing commented about costs for smaller gas stations, and suggested potential options like package deals or cooperative arrangements with certified technicians to reduce expenses, rather than only directing owners to individual installers.

Ms. McFerran responded that the Agency acknowledged discounts may be available through testers and installers, but emphasized that these fall outside its jurisdiction. She emphasized the need for stakeholder feedback on cost analysis, which relied on past notifications and market research due to limited manufacturer input. The Agency plans to share the cost analysis appendix and seek further input during online meetings.

Nancy Johnson asked if the response rate was what the Agency expected and if there was cross-agency collaboration with PSCAA to better coordinate and communicate about regulations.

Ms. McFerran replied that a 5% response rate is considered representative of a sample of their size and the responses they received were complete in terms of engagement on each question.

Ms. McFerran said that the Agency collaborates with the Department of Ecology's underground storage tank inspectors through a gas station rulemaking working group. While mindful of staying within its regulatory authority, the Agency seeks opportunities to harmonize efforts, such as aligning testing schedules to reduce burdens on station owners.

Ms. Meyer suggested the Agency create a toolbox with information from other agencies, including health impacts, to support outreach and education. Clear, concrete numbers and dates were recommended to improve understanding.

Tim Gould suggested to move the stakeholder question period earlier in the agenda, possibly after a brief overview of the new regulations, so responses could better inform the rest of the presentation.

## **II.B. Engagement Plans to Invite Public Input on the Draft Comprehensive Climate Action Plan**

Ms. Kaur introduced Sara Hetrick, Air Resource Specialist, to present on Engagement Plans to Invite Public Input on the Draft Comprehensive Climate Action Plan. A PowerPoint presentation was shared.

Executive Director Cooley expressed excitement about the upcoming public outreach for the Comprehensive Climate Action Plan (CCAP), highlighting that it's the first regional climate plan in decades. Beyond greenhouse gas reductions, it addresses support for overburdened communities, workforce development, and cost ranges. The plan allows all cities in the region, including those without the capacity to create their own plans, to participate, with the Agency helping connect resources and funding opportunities. Public engagement is crucial to ensure regional buy-in ahead of the plan's early December launch, coinciding with the EPA timeline and legislative session. Executive Director Cooley acknowledges the extensive stakeholder work, particularly Ms. Hetrick's coordination, and emphasizes the importance of encouraging public participation and support.

Ryan Kellogg asked about thoughts on how to reach low and income disadvantaged

communities about advertising the workshop opportunity and the feedback opportunity through media or trusted community partners.

Ms. Hetrick responded that the communications plan has specific points to work with community-based organizations and partners across the region.

Phyliss McElroy, Communications Manager, echoed Ms. Hetrick in that the Agency is pursuing avenues with community-based organizations to reach harder to reach community members. Ms. McElroy added that if Advisory Council members have specific outlets that the Agency should tap into, to please share.

Mia Ayala-Marshall asked how long the document is and if the whole document is going to be translated.

Ms. Hetrick responded that the document is currently about 100 pages, but it will include an executive summary to make key information accessible. The draft will not be fully translated into multiple languages, though Google Translate functionality is connected for general access. Recognizing the limitations of Google Translate, the team will provide translations of specific sections upon request. Full translations of the final document may be considered based on public needs, balancing resources, and emphasized that input is welcome on language priorities.

Ms. Ayala-Marshall added that the Washington State CCAP survey wasn't translated, which she believes created a barrier for non-English speakers and limited public feedback. She recommends translating surveys and providing sector-specific one-pagers in multiple languages.

Ms. McElroy added that the Agency has traditionally translated surveys and smaller form documents, and will make sure that sections of the plan are accessible to those in our region. The Agency has top five languages that are traditionally used, the Agency assures surveys and any other avenues for receiving feedback from community are as accessible as possible.

Ms. Kaur stated that she will share the information in newsletters that go out to community members.

Tim Gould asks how the plan aligns with the King County Strategic Climate Action Plan and how counties and cities are expected to incorporate it into their comprehensive plans. He shared that he believes climate progress could come from

transportation and land-use zoning changes and wanted to know how this effort could be made more effective in that context.

Ms. Hetrick explained that while they are closely collaborating with King County and were involved in developing its Strategic Climate Action Plan, the two plans serve slightly different purposes. King County's plan is highly prescriptive, while the regional climate plan takes a higher-level approach, offering a menu of options for decision-makers. They are reviewing comprehensive plans to identify opportunities and best practices to align local efforts with the regional climate plan, aiming to serve as a roadmap for prioritizing climate actions.

Jamie Hearn asked if the Agency plans to revisit the CCAP once the jurisdictions come out with the first round of the new climate element.

Ms. Hetrick confirmed and noted that the CPRG program is a four-year grant, currently nearing the end of year two, with two more years to focus on climate plan implementation. Ms. Hetrick emphasized supporting decision-makers with resources and partnerships and plans to hold a regional meeting after submitting the climate plan to gather input from partners.

## **II.C. Community Sponsorship Program Update**

Ms. McElroy shared a presentation with the Advisory Council on the Community Sponsorship Program Update. A PowerPoint presentation was shared.

Ms. Kaur shared that the city of Kent's human services department hosts monthly meetings with non-profit organizations and suggested it would be a good opportunity to share information there and also via email.

Nayiri Haroutunian recommended connecting with E3 Washington, a statewide umbrella organization for environmental educators that partners with the Washington Science Teaching Association. She noted E3's upcoming October conference and offered to help facilitate a connection to promote opportunities through their network.

Dan Rankin commented that in remote rural communities, many organizations are limited or nonexistent, and he believes residents often rely on town halls and libraries for information. He suggested that because utility bills and water bills are frequently distributed in person at these town halls, these are opportunities for contact.

Ms. McElroy was asked if she could share more details about the reasonable consideration criteria.

Ms. McElroy said that reasonable consideration means the Agency receives value in exchange for its support, such as exposure to new organizations, logo placement on materials, event tickets, or speaking opportunities. This ensures recognition as a technical partner while maintaining responsible financial stewardship.

Executive Director Cooley added the need to comply with the gift of public funds clause in the Washington State Constitution, ensuring sponsorships don't appear as gifts of public funds. The sponsorship program was created to demonstrate fairness and transparency, particularly for auditing purposes.

### **III.A. Staff Report**

Executive Director Cooley said the staff report is included in the meeting packet. She asked Council Members if they had any questions.

Tim Gould asked what portion of the agency's overall diesel emissions reduction efforts is funded by the federal DERA grant.

Executive Director Cooley explained that DERA funding does not cover staff time or operations, but provides significant financial incentives to encourage truckers to participate in the grant programs. Staff directly involved in the work were invited to add input.

Executive Director Cooley shared with the Advisory Council members an opportunity to present at the upcoming joint Board-Advisory Council meeting in November.

### **IV. Advisory Council Reports**

Ms. Kaur asked if there were any reports from Advisory Council members.

Stephanie Gowing shared that next week, Absher is celebrating Sustainability Week, which includes events like the upcoming showing of the film, "Women of Carbon."

Mr. Kellogg mentioned an upcoming update that will be given at the King County Board of Health on Public Health's climate and health equity initiative.

**V. ADJOURN**

With no further business, the Advisory Council adjourned at 10:58 a.m.

I hereby certify this to be a true and correct record of the Minutes of the September 10, 2025 meeting of the Advisory Council of the Puget Sound Clean Air Agency.

Atte

Christine S. Cooley  
Executive Director

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## Clean Air Agency

**DATE** **January 14, 2026**

**TO** **Advisory Council**  
**Puget Sound Clean Air Agency**

**SUBJECT** **Comprehensive Climate Action Plan Update**

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Advisory Council Members:

At your January meeting, we will share an update on the [Final Puget Sound Region Comprehensive Climate Action Plan \(CCAP\)](#), which staff successfully submitted to the Environmental Protection Agency (EPA) on November 25, 2025. We will also share high level themes heard from the CCAP Celebration meeting, held on December 9<sup>th</sup> at the Museum of Flight, and introduce three important initial steps for CCAP implementation including:

- Communicating and leveraging early wins resulting from the Climate Pollution Reduction Grant (CPRG) program and CCAP development, including the Regional Electric Vehicle (REV) Collaborative and region-wide Energize Program facilitated by King County (funded by a nearly \$50M CPRG grant), to help inform future collaborative efforts;
- Soliciting input from jurisdictions and partners on supporting the process of new and ongoing regional collaboration for climate strategy implementation (for example, the concept of a backbone organization to coordinate); and
- Developing a communications strategy for the CCAP including approaches and opportunities for legislative engagement in alignment with the state, for the 2026 legislative session.

During the presentation we will be looking for your feedback on these questions:

- Of the initial themes shared, is there anything you would like to flag or additional input you would like to share?
- What additional organizations/individuals should we speak to regarding what structure is helpful to support regional climate efforts?
- Regarding the 9Zero February 24<sup>th</sup> event, are there specific community-based organizations or others we should invite?

We look forward to discussing this important topic with you all.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Christine Cooley".

Christine Cooley  
Executive Director



# Comprehensive Climate Action Plan (CCAP) Update

Advisory Council January 14, 2026



**PUGET SOUND REGION**  
**Final Comprehensive Climate Action Plan**

For the Seattle-Tacoma-Bellevue Metropolitan Statistical Area (MSA),  
on behalf of all cities and counties in the four-county Puget Sound  
Region of King, Kitsap, Pierce, and Snohomish Counties

December 1, 2025

**CAA**  
PUGET SOUND  
Clean Air Agency

# Final Climate Plan Submittal

- Submitted Final Comprehensive Climate Action Plan (CCAP) to EPA prior to the December 1<sup>st</sup> deadline
- Held CCAP Celebration and Next Steps meeting with regional partners on December 9<sup>th</sup> at the Seattle Museum of Flight

Comprehensive Climate Action Plan (CCAP) Update

January 14, 2026





## December Celebration & Next Steps meeting

Table questions:

1. What are three ways a regional group can continue momentum around the CCAP's recommendations over the next year?
2. What barriers exist to implementing the CCAP's recommendations and how might we address them?
3. How can we ensure overburdened and frontline communities are actively involved at all stages of planning?
4. Would nominating a backbone organization be helpful to guide regional efforts by cities and counties? Who else needs to be involved?

Comprehensive Climate Action Plan (CCAP) Update

January 14, 2026

# Preliminary Input Heard

Ways a regional group can continue momentum around the CCAP's recommendations:

**Key themes: Identifying priorities and scalable solutions, Identifying funding, Enhancing coordination and capacity-building, Communicating progress, Utilizing existing momentum, Focusing on implementation**

Barriers that exist to implementing the CCAP's recommendations:

**Key themes: Identifying roles and responsibilities, Addressing funding gaps, Communicating momentum, Developing public-private partnerships**

Ensuring overburdened and frontline communities stay actively involved:

**Key themes: Use storytelling, Engage trusted partners, Provide compensation, Engage youth, Communicate expectations**

Nominating a backbone organization for guiding regional efforts:

**Key themes: More information is needed**



Comprehensive Climate Action Plan (CCAP) Update

January 14, 2026

# Next 300 Days

- Communicate and celebrate early wins (e.g., REV Collaborative, Energize Program, etc.)
- Solicit more input and identify options for a backbone organization to support regional climate efforts
  - Aim for consistency across 4 counties that maximizes scale while promoting innovation and specialization
- Implement the Communications Strategy
  - Identify opportunities for legislative engagement
  - Continue outreach with additional partners (e.g., frontline communities, community-based organizations, innovation/opinion clusters, etc.)
    - 9Zero Forum February 24th

Comprehensive Climate Action Plan (CCAP) Update

January 14, 2026



# Existing Climate Coordination

- King County Climate Change Cities (K4C)
- Alliance for Sustainable Climate Action (ASCA) for Pierce County
- PSRC Regional Transportation Plan Climate and Resilience Report
- Puget Sound Climate Preparedness Collaborative
- Cross-County Electric Vehicle (EV) Coordination Group
- Regional EV Charging Infrastructure Plan

Comprehensive Climate Action Plan (CCAP) Update

January 14, 2026



# Questions for Advisory Council

- Of the initial themes shared, is there anything you would like to flag or additional input you would like to share?
- What additional organizations/individuals should we speak to regarding what structure is helpful to support regional climate efforts?
- Regarding the 9Zero February 24<sup>th</sup> event, are there specific community-based organizations or others we should invite?



# Thank you & Questions

Comprehensive Climate Action Plan (CCAP) Update

January 14, 2026





PUGET SOUND

## Clean Air Agency

**DATE** **January 14, 2026**

**TO** **Advisory Council**  
**Puget Sound Clean Air Agency**

**SUBJECT** **Reasonable Alternatives to Outdoor Burning (RAOB) Update**

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Advisory Council Members:

At your January meeting, we will share a review and update on the limited burning policy authorized by the Washington Clean Air Act where reasonable alternatives to outdoor burning (RAOB) exist. Staff will review materials shared with you and update on their recommendation and conversation with the Board in October 2025.

We will share next steps for pre-rulemaking outreach and will solicit your input on our approach to messaging, as well as solicit specific suggestions you may have for contacts, venues, and events this spring in our unincorporated areas where outreach will be focused.

During the presentation we will be looking for your feedback on these questions:

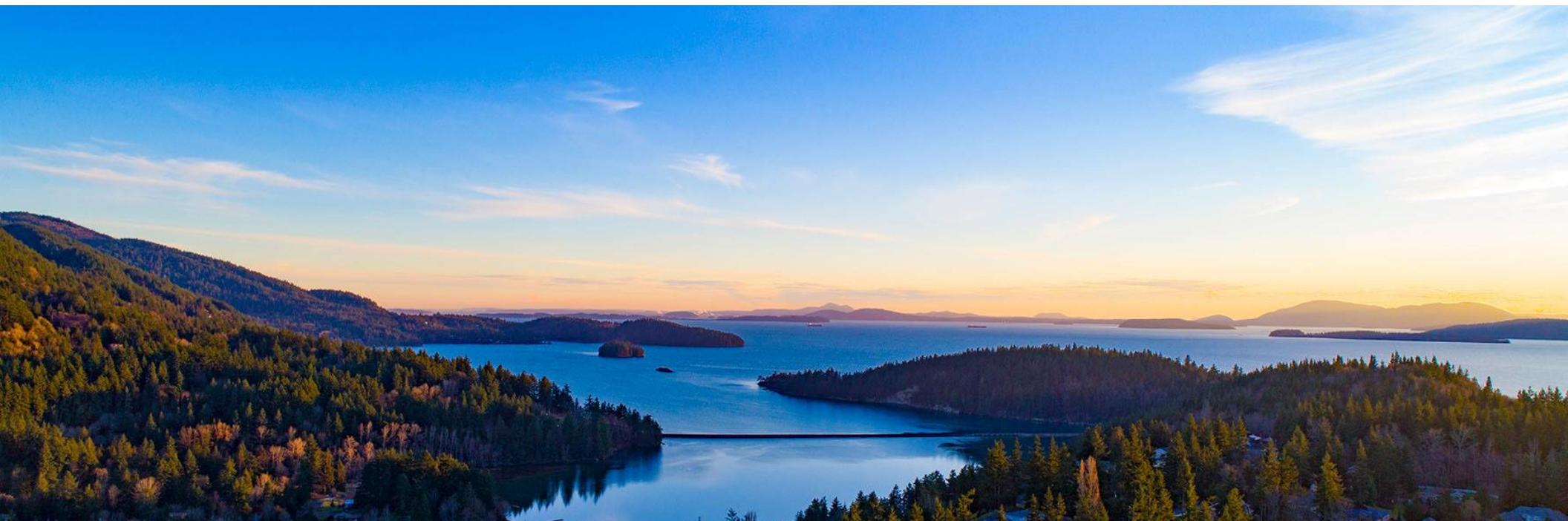
- What suggestions do you have for public meeting venues and messaging for pre-rulemaking engagement (in unincorporated areas)?
  - Are there any public events in the Spring 2026 timeframe we should be aware of?
  - Are there specific language needs in our target areas?
  - Suggestions on key messaging?
- Who else should we reach out to? (eg. Public Health districts/Solid Waste)

We look forward to discussing this important topic with you all.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Christine Cooley'.

Christine Cooley  
Executive Director



# Strategic Plan Objective 1.6 – Reasonable Alternatives to Outdoor Burning (RAOB) Update

## Advisory Council Meeting

January 2026



# RAOB – To be covered today

- Quick recap
- Staff Recommendation to the Board from Oct 2025 meeting
- Overview of timeline
- Solid Waste Division and Fire District Phase 2 Outreach Plan
- Initial Public Outreach Plan
- Advisory Council Input



# Recap – Definitions –Different types of burning

## What type of burning are we talking about?

TYPE	STATUS
<b>Residential burning</b> Yard waste, limbs, leaves, clippings	<b>Banned in urban growth areas</b> Allowed outside UGAs
<b>Land clearing</b> Fires to clear land for development	<b>Prohibited in entire jurisdiction</b> King, Snohomish, Pierce, Kitsap counties
<b>Recreational fires</b> Barbecues, cooking fires, campfires, bonfires, chimineas, fire pits	<b>Allowed in &amp; outside UGAs</b> designated areas or private property or ceremonial purposes
<b>Other</b> Tumbleweed burning, debris from floods, weed abatement, agricultural	

## Recap – Reasonable Alternatives to Outdoor Burning In Revised Code of Washington and Washington Administrative Code

RCW 70A.15.5070 Limited outdoor burning—Program—Exceptions (6)

**“Burning shall be prohibited in an area when an alternate technology or method of disposing of the organic refuse is available, reasonably economical, and less harmful to the environment.** It is the policy of this state to foster and encourage development of alternate methods or technology for disposing of or reducing the amount of organic refuse.”

WAC 173-425-040 Areas where certain types of outdoor burning are prohibited.

“...every third year...each local air authority, and Ecology in cooperation with counties, must **determine whether any areas...have a reasonable alternative to burning.**”

# Recap – Criteria for “Reasonable” in WAC<sup>1</sup>

A reasonable alternative exists if the answer to questions 1 and 2 is “yes”

**1) Is the area served by available and economical;**

- a. Recycling (or composting) **pick up service**;

**OR**

- b. 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**.

**2) Is any available and reasonably economical alternative less harmful to the environment than outdoor burning?**

Less harmful



More harmful

Waste Reduction

Recycling

Energy Recovery or Incineration

Landfill Disposal

Outdoor Burning

# Recap - current review shows substantial progress

## **Populations by County with Reasonable Alternatives Available in Non-urban Growth Areas**

Numbers in parentheses represent the percentage of the population relative to the county's "non-UGA" population

	King	Pierce	Kitsap	Snohomish	Total
Total population	2,269,675	920,393	275,611	827,957	4,293,636
Total population outside UGAs	246,266	430,248	179,719	367,716	1,223,949
Population outside UGAs with curbside pickup available	245,138 (99.5%)	428,489 (99.6%)	164,630 (92%)	367,625 (99.9%)	1,205,882 (98.5%)
Population outside UGAs within 10 miles of transfer stations with fees less than state's median tipping fee	214,526 (87%)	397,520 (92%)	133,264 (74%)	297,080 (81%)	1,042,390 (85%)
Population outside UGAs not covered by either	908 (0.4%)	437 (0.1%)	10,086 (6%)	91 (0.02%)	11,522 (0.9%)

January 2026

<https://data.census.gov/profile/Washington?g=040XX00US53>

[https://snohomishcountyywa.gov/DocumentCenter/View/121979/20240503\\_Population-Section\\_final-draft?bId=](https://snohomishcountyywa.gov/DocumentCenter/View/121979/20240503_Population-Section_final-draft?bId=)



# Staff Recommendation

- Presented the following staff recommendation to the Board in Oct 2025 meeting
- All criteria of WAC 173-425-040 are met, as well as Board-identified thresholds (e.g. more than 90% of affected population has access to reasonable alternatives)
- Staff recommended that the Board move forward to ban yard waste burning countywide, with pacing to leverage county solid waste plans and allow ample time to build outreach and awareness.
  - Per Organics Management Law (HB 2301), jurisdictions must make year-round organics collection service available by April 1, 2027
  - By January 1, 2026, Kitsap County will require curbside collection service be available to all residents

# Staff Recommendation – Proposals and Pacing

## Recommendation A: Uniform Implementation

- Ban residential yard waste burning in **King, Snohomish, Pierce, and Kitsap Counties, effective January 1, 2028**
- Provides consistency across all counties

## Recommendation B: Staggered Implementation

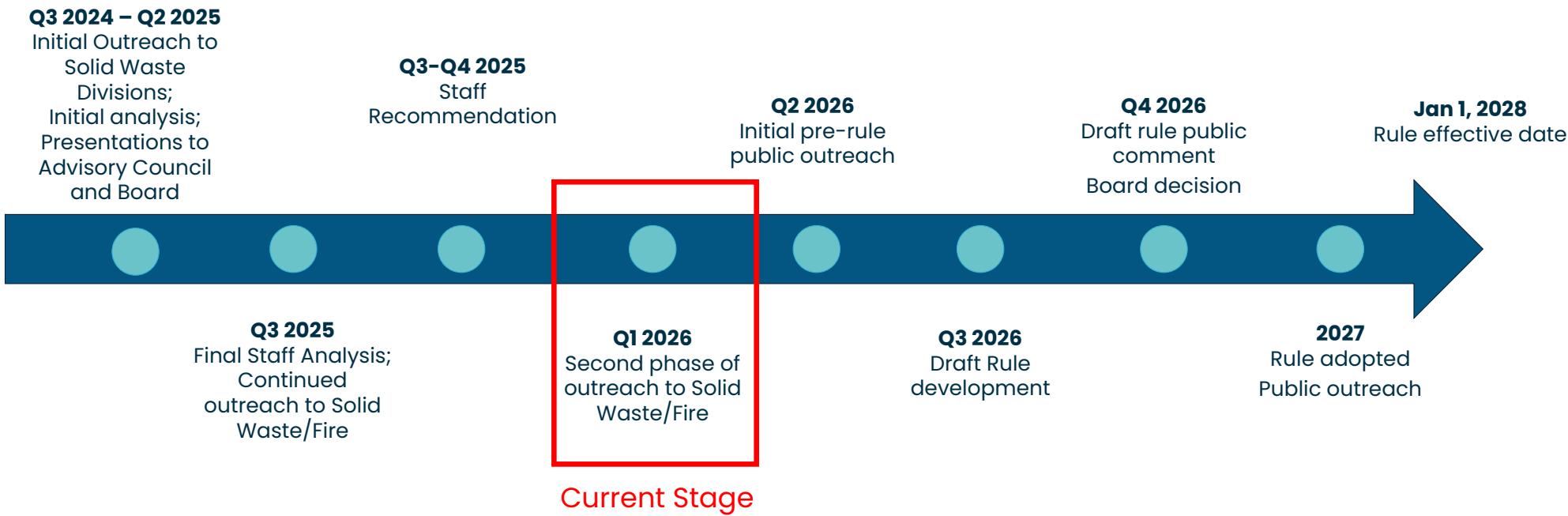
- Ban residential yard waste burning in **King, Snohomish, and Pierce Counties, effective January 1, 2028**
- Ban residential yard waste burning in **Kitsap County, effective January 1, 2029**
- Allows more time for infrastructure and support in Kitsap County

# Proposed Next Steps/Timeline

- Initiate broader pre-rulemaking engagement in winter and spring 2026
  - Key stakeholders include Solid Waste Divisions and Fire Districts
  - Likely to include broader public in-person workshop in each county in spring 2026 timeframe
- Staff develop draft rule in summer 2026
- Staff propose rule and conduct formal hearings in fall 2026
- Board considers rule for potential adoption in late fall/winter 2026
- Conduct additional education with stakeholders prior to effective date



# Draft Timeline



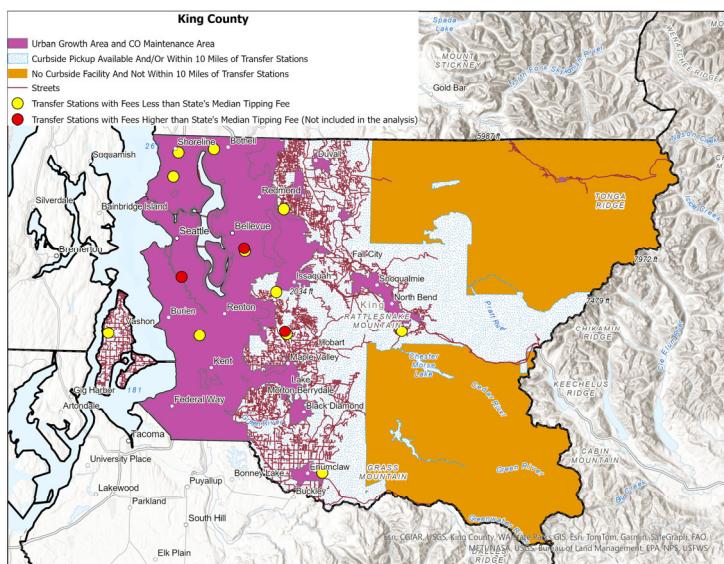
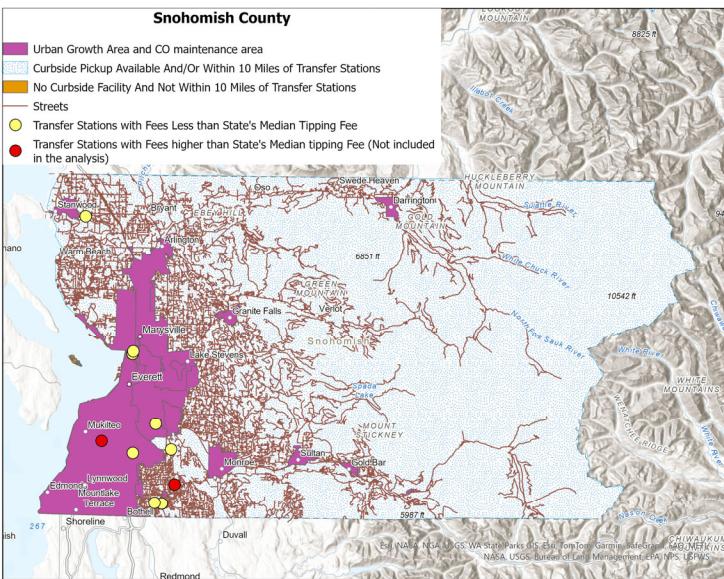
# Solid Waste and Fire – Outreach Phase 2

## Winter 2026

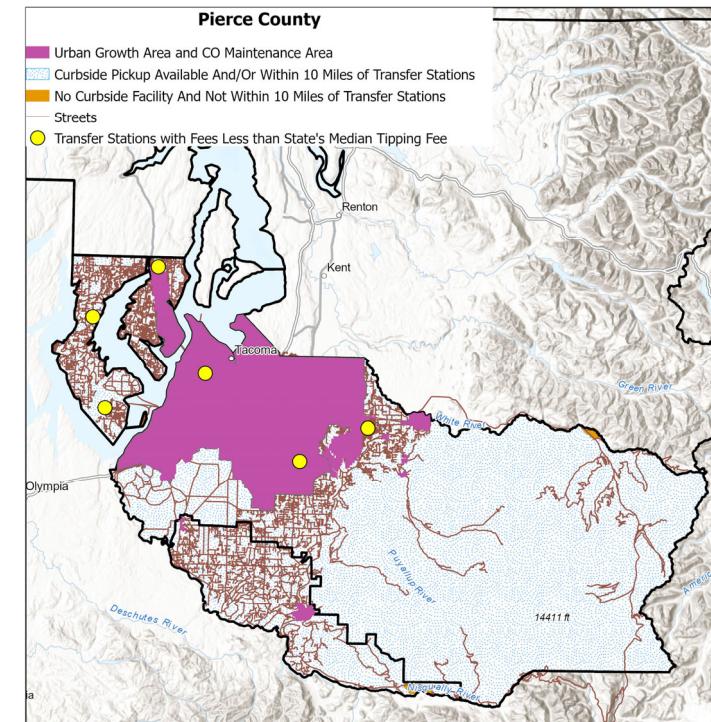
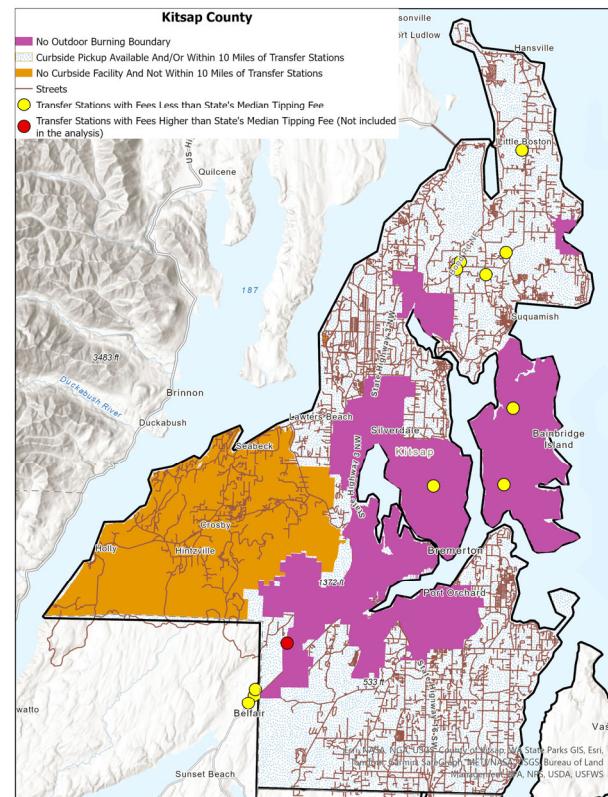
- Primary questions
  - What contacts, venues, or community events can you share that could help in planning for the public outreach sessions?
  - Can you help spread the word in newsletters, and/or participate in our public outreach sessions?
  - [Solid Waste] Do existing facilities and curbside service providers have capacity to manage increased yard waste?
  - [Fire Districts] Enforcement structure – past practice and future design
  - Are there any unintended consequences we should be aware of? Any other groups we should be working with? (e.g. health departments, Tribes)

# Initial Stakeholder Engagement – Public Spring 2026

- Core messages
  - What: Residential yard waste burning will be prohibited, where/how to dispose of yard waste instead
  - Why: WAC, stress co-benefits (fire risk, health) and availability of alternatives (how)
  - Where: Across all of King, Kitsap, Pierce, and Snohomish Counties
  - When: January 1<sup>st</sup>, 2028\*
- Target audience
  - The public in unincorporated areas.
- Methods
  - One public meeting in all four counties. Co-host if possible with Solid Waste and Fire Districts.
  - Through Solid Waste communications with their customers (direct mail, fliers, quarterly reports, etc.)
  - At public events attended by Solid Waste, Fire Districts, or PSCAA



## County Maps – outreach in white/dot and orange areas

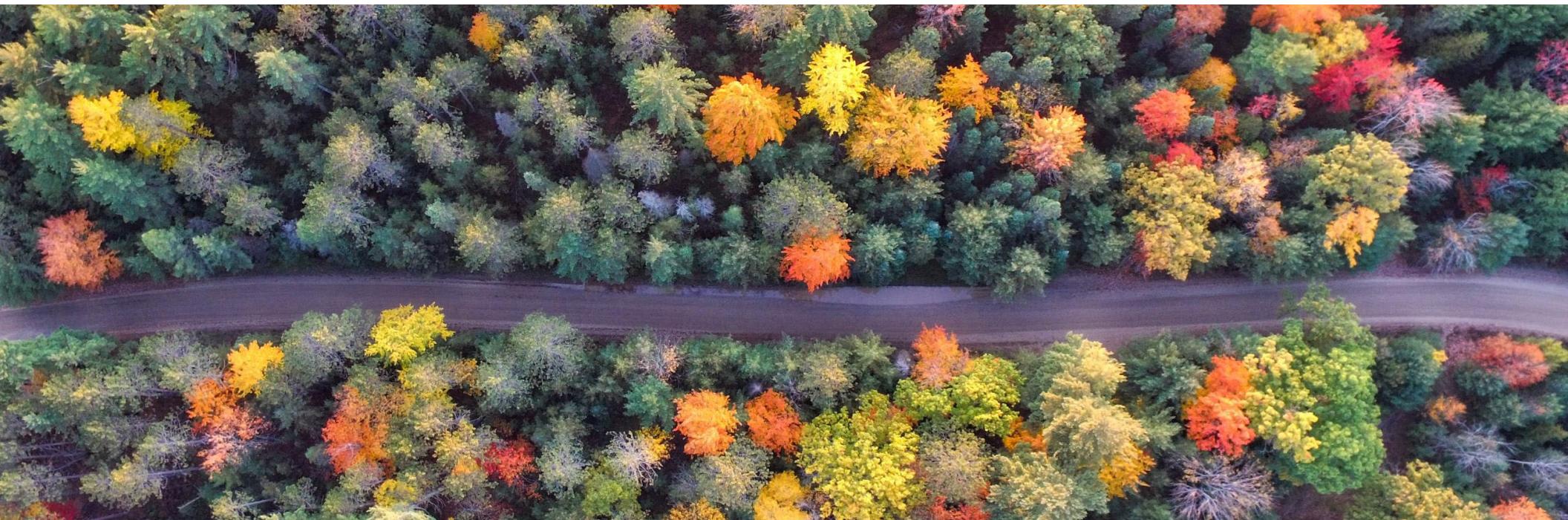


PUGET SOUND  
Clean Air Agency

# Advisory Council Input

- What suggestions do you have for public meeting venues and messaging for pre-rulemaking engagement (in unincorporated areas)?
  - Are there any public events in the Spring 2026 timeframe we should be aware of?
  - Are there specific language needs in our target areas
  - Suggestions on key messaging?
- Who else should we reach out to? (eg. Public Health districts/Solid Waste permitting)

# Thank you



January 2026

**CAA**  
PUGET SOUND  
Clean Air Agency



## Clean Air Agency

**DATE** **January 14, 2026**

**TO** **Advisory Council**  
**Puget Sound Clean Air Agency**

**SUBJECT** **"Permitting 101" Presentation**

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Dear Advisory Council Members:

At the January 2026 Advisory Council meeting, John Dawson, Engineering Manager, will give a presentation entitled "Permitting 101". This is intended as an informational briefing on the Agency's permitting processes, in response to requests from Council members for more information on this topic.

The first topic of the presentation will be the review of new sources or modifications of existing sources through the Notice of Construction program. This will include an overview of the criteria for approval of Notice of Construction applications, examples of Notice of Construction permit conditions, and public notice procedures for draft Notice of Construction permits.

The second topic of the presentation will be the Air Operating Permit program. This will include the criteria for determining if a source is subject to the program, the contents of Air Operating Permit documents, public notice procedures for draft Air Operating Permits, and US EPA review of proposed Air Operating Permits.

During the presentation we will be looking for your feedback on this question:

- How could the Agency improve this presentation so that the permitting process is clearer to the audience?

I look forward to your questions.

A handwritten signature in black ink, appearing to read "Christine Cooley".

Christine Cooley  
Executive Director



# Permitting 101

## January 2026 Advisory Council Meeting

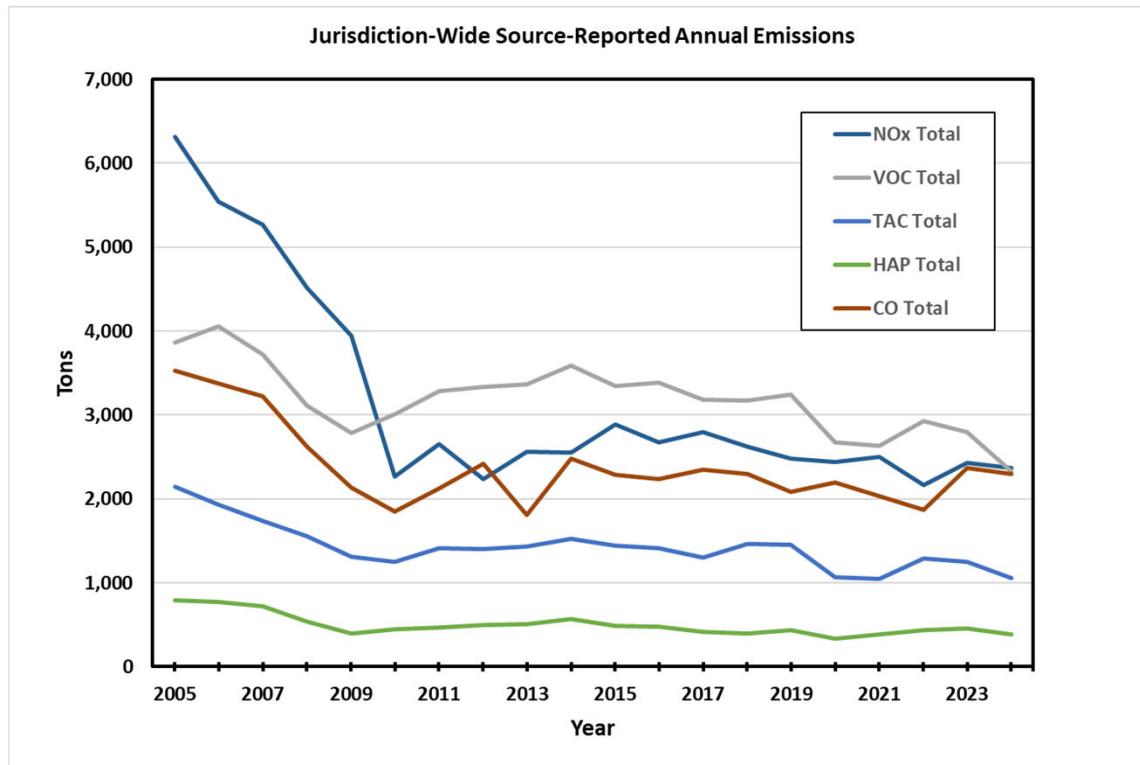
January 14, 2026



## Some Permitting History

- Authority stems from Washington's Clean Air Act (originally passed in 1967) and federal Clean Air Act (originally passed in 1970)
- Review and approval of *new* sources in Washington CAA since the beginning, review of toxics added in 1990s
- *Operating* permits established by federal Clean Air Act Amendments of 1990
- Permitting is just one tool in the CAA regulatory toolbox.

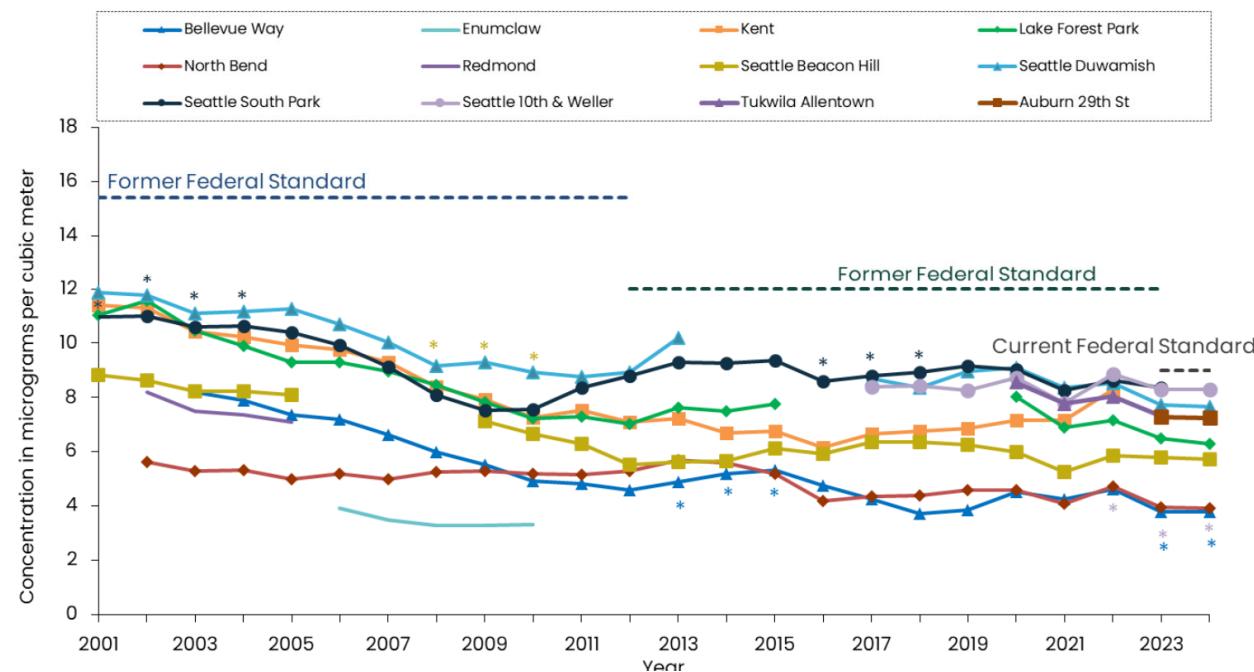
## Some Context



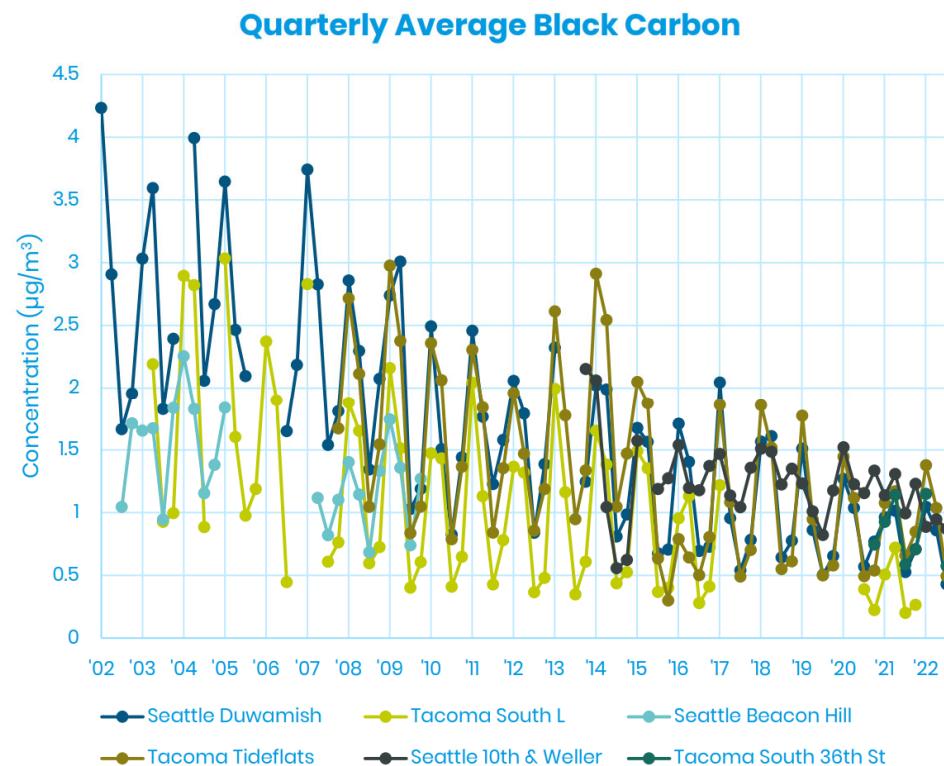
# Some Context

## King County PM<sub>2.5</sub> Annual Design Values

(3-year average of annual mean concentrations)



# Some Context



# The Two Main Types of Permitting

## Notice of Construction (NOC)

- (aka “new source review”)
- Building a new source of air pollution, or making changes to an existing source
- Authority stems from Washington Clean Air Act, with rules in WAC 173-400, and Agency Regulations I and III

## Air Operating Permit

- Collection of facility’s existing applicable requirements into one document
- Program originates in federal Clean Air Act, with state rules in WAC 173-401

# What is a Notice of Construction (NOC)?

- Once-in-time permits attached to a specific location, and only expire when the Agency issues a new order or the activity covered by the permit shuts down
- A source must obtain from the Agency an NOC order of approval (permit) before a source of emissions is constructed or modified
- Document **with conditions** that provide assurance that the activity will meet all of the applicable NOC approval criteria

# NOC Approval Criteria

- WAC 173-400-113 states a “permitting authority that is reviewing an application to establish a new source or modification... **shall** issue an order of approval if it determines that the proposed project satisfies” three requirements:
  - (1) compliance with all applicable federal, state and Agency new source and hazardous air pollutant standards (“HAPs”);
  - (2) employment of Best Available Control Technology (BACT) for all emitted pollutants; and
  - (3) allowable emissions will not cause or contribute to a violation of any ambient air quality standard (NAAQS)
- WAC 173-460 adds additional requirements related to Toxic Air Pollutants (TAPs)

# Approval Criteria: BACT

**“Employment of Best Available Control Technology (BACT) for all emitted pollutants”**

- Case-by-case emission limitation, determined by the permitting authority for each pollutant
- Many considerations go into determining BACT, such as:
  - What have other recent permits for this source type required?
  - What air pollution controls are technically feasible?
  - What is the cost of a pollution control device relative to the amount of pollution abated?
  - Etc.
- Future permits are generally more stringent than past permits

# Puget Sound Air Pollution Control Agency

HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 10736

Notice of Construction No. 6055

Date JUN 21 1995

One CB700-400-150 Cleaver Brooks 400 HP Boiler at 16.750 MMBtu/hr.

JOHN McBRIDE, PROJ MGR

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T  
MANKE LUMBER CO INC (8TH ST)  
13702 8TH ST E  
SUMNER WA 98390

O MANKE LUMBER CO INC (8TH ST)  
W 13702 8TH ST E  
E SUMNER WA 98390

## INSTALLATION ADDRESS

MANKE LUMBER CO INC (8TH ST), 13702 8TH ST E, SUMNER, WA, 98390

## THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Air Pollution Control Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of PSAPCA.
2. Compliance with this ORDER and its conditions does not relieve the owner or operator from the responsibility of compliance with Regulations I, II or III, RCW 70.94 or any other emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply. Section 5.05(e) of Regulation I requires that the owner or operator must develop and implement an operation and maintenance (O&M) plan to assure continuous compliance with Regulations I, II, and III.
3. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
4. This boiler is subject to conditions of 40 CFR Part 60, Subpart Dc.
5. ~~This boiler shall only be fired with natural gas fuel.~~
6. ~~This boiler shall not exceed 0.10 lb NOx/MMBtu as determined by EPA Method 7E.~~
7. This boiler shall not exceed 5% opacity as determined by EPA Method 9.



# Puget Sound Air Pollution Control Agency

HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Notice of Construction No. 7718

Registration No. 18429

Date MAR 10 1999

One natural gas fired Gordon Piatt Steam Boiler rated at 10.5 MMBtu/hr.

## APPLICANT

Jim Johnstone, Ops Mgr  
Pacific Rendering Co Inc  
4034 W Marginal Wy SW  
Seattle, WA 98106

## OWNER

Pacific Rendering Co Inc  
4034 W Marginal Wy SW  
Seattle, WA 98106

## INSTALLATION ADDRESS

Pacific Rendering Co Inc, 4034 W Marginal Wy SW, Seattle, WA, 98106

## THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Air Pollution Control Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of PSAPCA.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
3. Pacific Rendering Co shall comply with requirements of 40 CFR 60 Subpart A and Subpart Dc, notify the U.S. Environmental Protection Agency of construction, and comply with requirements for recordkeeping.
4. Pacific Rendering Co shall not operate the boiler to exceed the following hourly average emissions limits, except when following a source test plan approved by the Control Officer under Regulation I, Section 3.07:
  - (a) NOx is not to exceed 0.05 lb/MMBtu (EPA Method 7E),
  - (b) CO is not to exceed 0.05 lb/MMBtu (EPA Method 10A), and
  - (c) PM10 is not to exceed 0.01 gr/dscf @ 7% O<sub>2</sub> (PSAPCA Method 5)
5. Pacific Rendering Co shall not exceed 5% opacity from the boiler for a period or periods aggregating more than 3 minutes in any 1 hour as determined by WDOE Method 9A.

## Puget Sound Clean Air Agency



### HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Notice of  
Construction No. 9061

Registration No. 21277

Date 8/24/2004

16.75 MMBtu/hr boiler, to replace an existing older, non-repairable boiler at the No. 9 Steam Plant (Bldg. 3152), to supply hot water for general use in barracks and mess halls.

#### APPLICANT

Terry Lee  
U S Army Fort Lewis DA, Public Works  
AFZH-PWE, MS:17, Box 339500  
Fort Lewis, WA 98433-9500

#### OWNER

U S Army Fort Lewis DA, Public Works  
AFZH-PWE, MS:17, Box 339500  
Fort Lewis, WA 98433-9500

#### INSTALLATION ADDRESS

U S Army Fort Lewis DA, Public Works, Headquarters (I Corps & Fort Lewis), Fort Lewis, WA, 98433

#### THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
3. US Army Fort Lewis shall fire the boiler only on natural gas except during times of curtailment by the gas supplier or when testing the boiler on fuel oil. Testing on fuel oil shall not exceed 14 days during any calendar year. US Army Fort Lewis shall maintain records of the dates fuel oil is burned, and the reasons for burning fuel oil for a minimum of 2 years following the date of the record and shall make this information available to Puget Sound Clean Air Agency personnel upon request.
4. Fuel oil fired in the boiler shall be subject to the following sulfur content limitations, as purchased:
  - a. Through September 1, 2006 - 0.05 percent sulfur by weight; and
  - b. After September 1, 2006 - 15 parts per million by weight.
5. US Army Fort Lewis shall maintain records of the grade and the sulfur content of the fuel oil from each supplier of fuel oil for the boilers as follows, for a minimum of 2 years following the date of the record, with each record to contain:
  - a. The name of the fuel oil supplier; and
  - b. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c and that oil sulfur content does not exceed the limitation in Condition 4.a or 4.b as appropriate.
6. The boiler exhaust stacks shall not emit nitrogen oxides (NOX) in excess of 12 parts per million when fired on natural gas, or 80 parts per million when fired on oil, on a dry, volumetric basis corrected to 3% O2 as determined by EPA Reference Method 7E. Emissions of NOX from the boilers shall not exceed 1.50 tons for any consecutive 12-month

## Puget Sound Clean Air Agency



### HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Notice of  
Construction No. 9068

Registration No. 13125

Date 12/10/2004

64 MMBtu/hr natural gas fired boiler with low-NOx burners and flue gas recirculation.

#### APPLICANT

Michael L. Verhaar  
Boeing Commercial Airplane Renton  
PO Box 3707 MC 92 10  
Seattle, WA 98124-2207

#### OWNER

Boeing Commercial Airplane Renton  
PO Box 3707 MC 92 10  
Seattle, WA 98124-2207

#### INSTALLATION ADDRESS

Boeing Commercial Airplane Renton, 800 Logan Ave N, Renton, WA, 98055

#### THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
3. The boiler shall be fired only on natural gas.
4. The boiler shall meet all applicable requirements of 40 CFR 60 Subpart Dc. Records of fuel usage pursuant to this requirement and 40 CFR 60.48c(g) shall be maintained on a monthly basis and may be in the form of fuel bills or meter readings or any other records that adequately document fuel use.
5. The boiler shall meet all applicable requirements of 40 CFR 63 Subpart DDDDD.
6. The boiler exhaust stack shall not emit nitrogen oxides (NOx) in excess of 9 parts per million on a dry, volumetric basis corrected to 3% O2 as determined by EPA Method 7E (40 CFR Part 60, Appendix A) or equivalent method approved by the Puget Sound Clean Air Agency.
7. The boiler exhaust stack shall not emit carbon monoxide (CO) in excess of 50 parts per million on a dry, volumetric basis corrected to 3% O2 as determined by EPA Method 10 (40 CFR Part 60, Appendix A) or equivalent method approved by the Puget Sound Clean Air Agency.
8. The opacity of emissions from the boiler shall not exceed 5% for a period or periods aggregating more than 3 minutes in any 1 hour, as determined by Washington Department of Ecology (Ecology) Method 9A. Boeing shall conduct quarterly inspections of the boiler stack for visible emissions. Inspections are to be performed during daylight hours while the boiler is in operation. If, during the scheduled inspection or at any other time, visible emissions other than uncombined water are observed, Boeing shall, as soon as possible, but no later than within 24 hours of the initial observation, take corrective action until there are no visible emissions or, alternatively, record the opacity using Ecology Method 9A or shut down the boiler until it can be repaired.

# Puget Sound Air Pollution Control Agency

HEREBY ISSUES AN ORDER OF APPROVAL  
TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 10076

Notice of  
Construction No. 3372

Date 12/13/89

One Process Combustion Corp Thermal Oxidizer at 18 MMBH, one Dupps 900 Cooker, two Dupps Pressors,  
one Bird Centrifuge, one Venturi Scrubber at 10,000 cfm, one Packed Tower Scrubber at 50,000 cfm,  
one Cross Flow Scrubber at 66,000 cfm and one gas/diesel oil-fired boiler (Murray Iron Co MCF-4-53) at 65 MMBH.

JAKE TRAMMELL

A PUGET SOUND BY-PRODUCTS CO  
P  
L PO BOX 1716  
I  
C TACOMA  
A  
N  
T

WA 98401-1716

O PUGET SOUND BY-PRODUCTS CO  
W  
N PO BOX 1716  
E  
R TACOMA  
WA 98401-1716

## INSTALLATION ADDRESS

PUGET SOUND BY-PRODUCTS CO, 2041 MARC, TACOMA, WA, 98421

## THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Air Pollution Control Agency to the applicant to install, alter or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of PSAPCA.
2. Compliance with this ORDER and its conditions does not relieve the owner or operator from the responsibility of compliance with Regulations I or II, RCW 70.94 or any other emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
3. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.





## Puget Sound Clean Air Agency

Notice of Construction No. 12348

### HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 10076  
Date JUN 9 6 2024

Wast Rendering Operation consisting of a raw material receiving pit receiving material by a 125,000 cfm air scrubber. One Dupp Supercoker Model 260U controlled by One Air-cooled condenser system, One 15,000 cfm scrubber and a final 18 MMbtu/hr Thermal Oxidizer. Raw material receiving pit which is located inside a building that is negative pressure controlled. Finished protein meal storage silo equipped with bin vent filters located outside the building.

OWNER

INSTALLATION ADDRESS

Darling Ingredients Inc  
5601 N. MacArthur Blvd  
Irving, TX 75038

Darling Ingredients Inc  
2041 Mare St  
Tacoma, WA 98421

### THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

- Approval is hereby granted as provided in Article 6 of Regulation 1 of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described herein at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
- This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
- The owner and/or operator shall not process more than 500 tons of raw material per day. Monthly records shall be kept on site to verify compliance with this requirement.
- The Rendering building shall be kept under negative pressure at all times when receiving or storing raw material or in the process of rendering raw material, except during limited periods when the receiving area doors are open to allow for entry/exit of raw materials as needed.
  - The owner and/or operator shall take monthly readings with a portable anemometer to verify that the main processing building is under negative pressure during periods of normal plant operation. The anemometer shall be calibrated per the manufacturer's recommendations.
  - As an alternative to monthly measurements, the owner and/or operator shall continuously verify that the main processing building is under negative pressure, the owner and/or operator may choose to design and operate the ventilation system serving the main processing building such that a minimum of not less than 15 air changes per hour is maintained through the building. To demonstrate compliance with the air changes requirement, the owner and/or operator shall notify the agency of the intent to meet the alternative standard under this paragraph and submit the following:
    - Calculations to design the ventilation system of the building is designed to meet the alternative ventilation system standard; and
    - A plan for monitoring appropriate parameters (for example, pressure at the fan inlet, or fan revolutions per minute) to demonstrate that the alternative ventilation system standard is continuously achieved.
  - The owner and/or operator shall monthly inspect the integrity of the building and the associated vapor collection ductwork for the rendering process. This includes looking for any corrosion of piping or ducting, leaks, and openings to the building. Any instances where the integrity is found to be compromised must be repaired as soon as practicable, and within 15 days of discovery. Until the repair is made, the owner and/or operator shall daily inspect for any migration between the line and the building. Daily inspections shall exclude walking around the facility property and using sight, sound, and smell to detect any odor migration. If odor migration is found during daily inspections, the facility shall take immediate corrective action to minimize impacts, which may include ceasing operations. A logbook shall be kept for documentation of all monthly equipment inspections and all daily odor inspections. For all inspections, the logbook shall include the date and time of the inspection, the name of the person conducting the inspection, and a list of all areas of compromised integrity that will require repair. Once the repair is made, the logbook shall also document the time and date of the repair.
- All material received for the process of rendering shall be processed within 24 hours of receipt. Each delivery of material shall be monitored, and records shall be maintained to ensure that processing is performed within this time limit.
- Raw material delivery trucks shall not be accepted and/or unloaded without first being weighed/scaled. The delivery trucks containing raw materials must be unloaded into the raw material receiving pit of the process building when the 125,000 cfm air room scrubber is operating.
- Raw material delivery trucks shall be unloaded within 8 hours of being scaled/weighed. If a delivery truck cannot be unloaded within 8 hours of being scaled, the owner and/or operator shall ensure that odors are not released from the trucks by either temporarily enclosing (such as tarping) them until they can be unloaded or removed from the facility until they are able to unload within the 8-hour window.
- The raw material trucks shall be cleaned prior to exiting the facility to prevent any odor-causing material from being tracked out of the facility.
- No outdoor storage of raw materials is allowed. Material delivery trucks waiting their turn to unload does not count as outdoor storage of raw materials as long as it remains inside the truck.
- The owner and/or operator shall wash/clean the raw materials if it is determined that the raw materials would have dirt or soil on them prior to entering the facility to ensure no residual heavy metals or impurities enter the cooking process. A visual inspection for dust and soil is acceptable for this permit condition.
- All emissions from the Dupp Supercoker 260U (or equivalent), shall be captured and vented to the air-cooled condenser, followed by the 15,000 cfm venturi scrubber and then the 18 MMbtu/hr Thermal Oxidizer. The permittee shall continuously monitor the air entering the Thermal Oxidizer and shall document that the air entering the Thermal Oxidizer is a violation of this condition, unless that compromise has been documented as needing repair in the log required under Condition 4.b. Examples of compromised integrity include, but are not limited to, degraded or corroded piping that contains unintended openings, broken connectors/gaskets/seals, rust that is deeper than superficial, or any other unintentional openings that have the potential to leak air emissions, including odors.
- All fugitive emissions from the post cooker drains, screens, screw presses, hammermill, protein grinding, crass material storage, centrifuges and discharge conveyors shall be conducted inside the negative pressure building and vented to the 125,000 cfm air room scrubber. The presence of a compromise in the integrity of the building envelope shall constitute a violation of this condition, unless that compromise has been documented as needing repair in the log required under Condition 4.b.

### Order of Approval for NC No. 12348

JUN 9 6 2024

### Order of Approval for NC No. 12348

JUN 9 6 2024

### Order of Approval for NC No. 12348

JUN 9 6 2024

standards in Permit Condition 18:

- VOC testing shall be conducted in accordance with EPA Test Method 25 or 25A or an alternative method approved by the Agency. Testing to quantify exempt compounds, such as methane, shall be conducted in accordance with EPA Test Method 18 or an alternative method approved by the Agency.
- CO testing shall be conducted in accordance with EPA Test Method 10 or an alternative method approved by the Agency.
- NOX testing shall be conducted in accordance with EPA Test Method 7E or an alternative method approved by the Agency.
- SO<sub>2</sub> testing shall be conducted in accordance with EPA Test Method 6C or an alternative method approved by the Agency.
- PM10 Testing shall be conducted in accordance with shall be conducted using EPA Method 201 and 202, EPA Method 201 or 202 or an alternative method approved by the Agency.

The owner and/or operator shall conduct testing in accordance with Section 3.07 of Puget Sound Clean Air Agency (PSCAA) Regulation 1 using the following test Methods:

Sampling sites and velocity traverse points shall be selected in accordance with EPA Test Method 1 or 1A. The gas volumetric flow rate shall be measured in accordance with EPA Test Method 2, 2A, 2C, 2D, 2F, 2G or 19. The dry molecular weight shall be determined in accordance with EPA Test Method 3, 3A or 3B. The stack gas moisture shall be determined in accordance with EPA Test Method 4.

The owner and/or operator may wait until the unit is needed to commence initial startup. Testing shall be performed while operating at or near maximum capacity of the rendering operation or under at another capacity that is approved by the Agency prior to conducting the performance test. During the performance test, the raw material processing rate shall be monitored and recorded in tons per hour.

- At least once per quarter during operation of the Dupp Supercoker 260U cooker (or equivalent) the owner and/or operator shall conduct visual observations of the Thermal Oxidizer exhaust. If any emissions are visible from the exhaust, the owner and/or operator shall conduct a visible emission observation by a person certified in accordance with EPA Reference Method 9 (40 CFR 60, Appendix A). Such a test shall consist of a minimum of 30 minutes of opacity observations for the cooker. The owner and/or operator shall ensure 0% opacity from the cooker as measured with the Method 9.
- The owner and/or operator shall limit emissions of the 125,000 cfm air room scrubber to the following:
  - PM10 - 0.001 gr/dscf outlet grain loading standard
  - VOC - 3.2 ppmv outlet standard measured as Methane
  - H2S - 0.75 ppmv outlet standard

Within 120 days of commencing initial startup of the 125,000 cfm air room scrubber and then repeatedly every 48 to 52 months of the previous test for H2S and VOC, the owner and/or operator shall conduct a performance test to verify compliance with the emission limits in Permit Condition 21:

- PM10 Testing (filterable and condensable) shall be conducted in accordance with shall be conducted using EPA Method 201 and 202, EPA Method 201a and 201 or an alternative method approved by the Agency.
- VOC testing shall be conducted in accordance with EPA Test Method 18, 25, 25A or an alternative method approved by the Agency.
- H2S testing shall be conducted using EPA Test Method 11, ARB Method 15 or 16A or other approved method by the Agency.

The owner and/or operator shall conduct testing in accordance with Section 3.07 of Puget Sound Clean Air Agency (PSCAA) Regulation 1 using the following test Methods:

Form 50-118, (12/15) Page No. 1 of 7

Form 50-118, (12/15) Page No. 2 of 7

Form 50-118, (12/15) Page No. 3 of 7

Page No. 1 of 7



# Approval Criteria: NAAQS

**“Allowable emissions will not cause or contribute to a violation of any ambient air quality standard (NAAQS)”**

- “Criteria” pollutants: PM<sub>2.5</sub>, PM<sub>10</sub>, O<sub>3</sub>, NO<sub>2</sub>, SO<sub>2</sub>, CO, Pb
- Depth of analysis largely depends on calculated emissions
- For small projects: usually clear from emissions estimates
- For bigger projects: dispersion modeling might be required

- Reminder: Entire four-county jurisdiction is in attainment for all NAAQS pollutants.

# Approval Criteria: TAPs

**WAC 173-460: “demonstrate that the increase in emissions of toxic air pollutants from the new or modified emission units at the source are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects”**

- Approximately 430 Toxic Air Pollutants listed in this rule
- Requires BACT for listed pollutants (tBACT)
- If emissions of pollutant over certain threshold, dispersion modeling is required
- If modeled ambient concentration is above Acceptable Source Impact Level (ASIL), then Health Impact Assessment by Ecology is required
- Highly impactful regulation

# Approval Criteria: Regulatory Emission Standards

- Emissions standards that apply to entire source categories
- Federal, state, or local
- Examples:

TABLE 1 TO SUBPART DDDDD OF PART 63—EMISSION LIMITS FOR NEW OR RECONSTRUCTED BOILERS AND PROCESS HEATERS <sup>a</sup>				
[Units with heat input capacity of 10 million Btu per hour or greater]				
If your boiler or process heater is in this sub-category . . .	For the following pollutants . . .	The emissions must not exceed the following emission limits, except during periods of startup and shutdown . . .	Or the emissions must not exceed the following output-based limits (lb per MMBtu of steam output) . . .	Using this specified sampling volume or test run duration . . .
1. Units in all subcategories designed to burn solid fuel.	a. Particulate Matter .....  b. Hydrogen Chloride .....  c. Mercury .....	0.0011 lb per MMBtu of heat input (30-day rolling average for units 250 MMBtu/hr or greater, 3-run average for units less than 250 MMBtu/hr).  0.0022 lb per MMBtu of heat input.  3.5E-06 lb per MMBtu of heat input.	0.0011; (30-day rolling average for units 250 MMBtu/hr or greater, 3-run average for units less than 250 MMBtu/hr).  0.0021 .....	Collect a minimum of 3 dscm per run.  For M26A, collect a minimum of 1 dscm per run; for M26 collect a minimum of 60 liters per run.  For M29, collect a minimum of 1 dscm per run; for M30A or M30B, collect a minimum sample as specified in the method; for ASTM D6784 <sup>b</sup> collect a minimum of 2 dscm.

## SECTION 9.09 PARTICULATE MATTER EMISSION STANDARDS

Adopted 03/13/68 (12)  
Revised 07/08/70 (126), 11/10/71 (135), 10/10/73 (214), 02/13/86 (597), 06/09/88 (621), 05/11/89 (643), 02/10/94 (777), 04/09/98 (865)

It shall be unlawful for any person to cause or allow the emission of particulate matter in excess of the following concentrations:

### Refuse Burning Equipment:

1. Rated at 12 tons per day or less without heat recovery and without hydrochloric acid control equipment ..... 0.10 gr/dscf @ 7% O<sub>2</sub>
2. Rated at 12 tons per day or less with heat recovery and with hydrochloric acid control equipment ..... 0.05 gr/dscf @ 7% O<sub>2</sub>
3. Rated at 12 tons per day or less with heat recovery ..... 0.02 gr/dscf @ 7% O<sub>2</sub>
4. Rated at greater than 12 tons per day ..... 0.01 gr/dscf @ 7% O<sub>2</sub>

### Fuel Burning Equipment:

1. Burning wood ..... 0.20 gr/dscf @ 7% O<sub>2</sub>
2. Burning wood and installed after March 13, 1968 or located within the urbanized area ..... 0.10 gr/dscf @ 7% O<sub>2</sub>
3. Burning wood, rated at 100 million Btu per hour or greater, and located within the urbanized area ..... 0.04 gr/dscf @ 7% O<sub>2</sub>
4. Burning wood and installed after March 1, 1986 ..... 0.02 gr/dscf @ 7% O<sub>2</sub>
5. Burning fuel other than wood ..... 0.05 gr/dscf @ 7% O<sub>2</sub>
6. Burning coal or other solid fossil fuel and installed after March 1, 1986 ..... 0.01 gr/dscf @ 7% O<sub>2</sub>

Equipment Used in a Manufacturing Process: ..... 0.05 gr/dscf

# Notice of New NOC Applications

- Once submitted by applicant, all new applications listed on Agency website for 15 days
- Weekly email to “Permit Actions” email list if any applications listed that week
- Opportunity to request comment period on the draft permit (once it’s ready)

## List of New Construction Projects

### Requests for Public Comment

Requests for a public comment period on a permit application must be submitted within 15 days of its posting.

Submit a written request to the Clean Air Agency via:

- Email: Refer to contact on the permit application
- Fax: 206-343-7522
- Postal Mail

Visit our [FAQ](#) page to find answers to common questions about our permitting process.

### New Construction Projects

Company	Address	Project Description	Date Posted	Contact Engineer
Romac Industries Inc	<a href="#">125 South Sultan Basin Rd, Sultan, WA 98294</a>	Application for a natural gas-fired burn-off oven. The burn-off oven would be used to clean hooks, racks and other metal parts encrusted with powder coating or paint coating. This burn-off oven would replace an existing burn-off oven at an existing metal fabrication facility.	12/16/25	Madeline McFerran
Fluid Motion LLC	<a href="#">17939 59th Ave NE Bldg #4, Arlington, WA 98223</a>	Application for addition of a new lamination building for building fiberglass boats at an existing fiberglass boat manufacturing facility.	12/8/25	Madeline McFerran
Multicare Health System	<a href="#">304 S 1 St, Tacoma, WA 98405</a>	Permit application submitted to install natural gas fueled combined heat and power configured with two microturbines and a waste heat fired heat recovery steam generator.	11/25/25	Ralph Munoz
City of Tacoma Central WWTP	<a href="#">2201 Portland Ave, Tacoma, WA 98421</a>	Application to change existing biofilter media from organic (hog fuel) material to inorganic engineered media. The biofilter treats odorous air from aerated grit removal tanks at a municipal wastewater treatment plant.	11/21/25	Madeline McFerran



# Comment Periods for Draft NOC Permits

- The Agency may conduct a comment period on the draft permit, if:
  - There is substantial public interest in the project
  - Someone has requested it
  - Project emissions are over certain thresholds
  - Etc.
- 30 days (or longer)
- Draft permit and supporting materials on Agency website
- Notice published multiple places:
  - Agency Permit Actions email list
  - Newspaper(s)
  - Agency website
- Hearing, if requested

Document #2025-00000000000000000000000000000000  
**Puget Sound  
Clean Air Agency**

are available from the Agency's website at [www.pscleanair.gov](http://www.pscleanair.gov). These documents are also on file and available for inspection at the Puget Sound Clean Air Agency, 1904 Third Avenue, Suite 105, Seattle, Washington, telephone (206) 343-8000. All comments with respect to the proposed Order and Determination of Nonsignificance must be mailed to Carl Slimp, Environmental Assessment Unit, Puget Sound Clean Air Agency, 1904 Third Avenue, Suite 105, Seattle, Washington 98101, faxed to the Engineering Manager at (206) 343-8022, e-mailed to [PublicComments@pscleanair.gov](mailto:PublicComments@pscleanair.gov) by December 8, 2025. Any person or entity may file a written hearing within the comment period should that person's or entity's interest in filing a hearing and why a hearing is warranted.

All comments received during the comment period will become part of the public record. Once the Agency has reviewed and responded to comments from the public, the proposed Order of Approval will, if requested, be issued and either denied or issued in final form.

Date of publication in the Seattle Daily Journal of Commerce, November 7, 2025.  
11/7(443902)

**PRELIMINARY DETERMINATION**

The Agency has completed a review of application No. 12307. Based on this review, the Agency has made a preliminary determination that the proposal meets all the requirements of Regulation 1, Sections II, and III, and therefore draft Order No. 12307 should be approved, subject to the conditions in the draft Order.

The Agency, as the lead agency for this proposal, has also made a "preliminary" determination that the proposal would not have a significant adverse effects impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(b). This decision was made after review of a completed Environmental Checklist and other information available at the agency. This information is available to the public upon request. The "Determination of Nonsignificance" for this proposal is issued in accordance with WAC 197-11-340(1), WAC 197-11-970, and Puget Sound Clean Air Agency Regulation 1, Sections 2.07 and 2.12. Puget Sound Clean Air Agency will not act on the proposal before December 9, 2025.

**PUBLIC COMMENT**

The proposed Order of Approval and Determination of Nonsignificance, along with the information considered in making this preliminary determination



**FAQ on Agency website:**  
<https://www.pscleanair.gov/m/faq>

## How do I make an effective Public Comment?



How you choose to comment is entirely up to you. The Agency does not guide people on what to say about any issue. However, a substantive comment questions the accuracy of the information provided in the draft permit or introduces new information that may not have been previously considered.

When a draft Notice of Construction permit is open for public comment, it means we believe the project meets all necessary criteria. Substantive comments for the Puget Sound Clean Air Agency typically relate to the four criteria the Agency reviews for every application (See “What is the Agency Reviewing”). The information below can be found in the PSCAA regulations and is also cited in the Washington Administrative Code (WAC).

**PSCAA Regulations:** [PSCAA Regulations](#)

**Washington Administrative Code:** [Chapter 173-400](#)

[WAC](#)

There are several useful guidelines of how to post a substantive public comment.



# Final Order of Approval

- If comments received, Agency prepares response to comments, and may revise permit conditions in light of comments
- Agency issues final permit
- Permit conditions live on forever (or until equipment is removed, or until permit is superseded by another permit)
- Potentially subject to appeal to Pollution Control Hearings Board for 30 days

# Recent NOC stats

<b>FY</b>	<b>Final NOC OAs issued</b>
2013	94
2014	130
2015	133
2016	167
2017	178
2018	147
2019	137
2020	161
2021	111
2022	95
2023	77
2024	81

# What is an Air Operating Permit?

- Collection of all applicable air requirements into one document
  - NOC requirements
  - Federal regulations (e.g., NSPS or NESHAP)
  - Agency or state regulations
  - Very limited opportunity for new requirements (generally monitoring)
- Required under three circumstances
  - Source has potential to emit 100 tons per year of a criteria pollutant
  - Source is a “major” source of hazardous air pollutants (HAPs)
  - Source is subject to a federal subpart that declares all subject sources to be subject to the operating permit program (usually incinerators)
- Permits up for renewal after 5 years
- NOCs sometimes require concurrent revision to Operating Permit
- About 30 AOP sources in our jurisdiction

# Comment Periods for Draft Operating Permits

PUBLIC NOTICE  
PUGET SOUND CLEAN  
AIR AGENCY  
DRAFT AIR  
OPERATING PERMIT  
Applicant:  
Kenworth Truck  
Company Renton  
1601 North 8th Street  
Renton, WA 98057

Puget Sound Clean Air Agency (the Agency) is seeking comments on draft Air Operating Permit (Permit No. 17796) for Kenworth Truck Company Renton, located at 1601 North 8th Street, Renton, WA 98057. This facility has paint booths, drying ovens, emergency engines, and other equipment to facilitate the assembly of highway and off-highway trucks. Facility operations result in releases of volatile organic compounds, hazardous air pollutants, oxides of nitrogen, carbon monoxide, sulfur dioxide, and particulate matter.

- All draft Operating Permits are subject to a public comment period
- 30 days (or longer)
- Draft permit and supporting materials on Agency website
- Notice published multiple places:
  - Agency Permit Actions email list
  - Newspaper(s)
  - Agency website
  - Department of Ecology's Permit Register
- Hearing, if requested

# After Public Comment Period

- If comments received, Agency prepares response to comments, and may revise permit conditions in light of comments
- Agency sends proposed permit to EPA for review
- EPA has 45 days to object to permit issuance
- If no objection, Agency issues final Operating Permit
- All active Operating Permits are on the Agency's website



# Compliance With Permits

- Permits can contain several types of conditions
  - Emission limits
  - Recordkeeping
  - Monitoring
  - Emissions testing
  - Reporting
- Main compliance mechanisms
  - Inspections
  - Report reviews

# Concluding Messages

- NOC approval criteria are spelled out in regulation.
- Approval is not an endorsement of a project.
- NOC permits for a given industry type usually become more stringent over time.
- An Air Operating Permit is a collection of existing applicable requirements into one document.
- Permitting is one important regulatory tool in the Agency's toolbox and one contributor to improving air quality in our region.

# Questions

How could the Agency improve this presentation so that the permitting process is clearer to the audience?





PUGET SOUND

## Clean Air Agency

**DATE**

**December 11<sup>th</sup>, 2025**

**TO**

**Board of Directors  
Puget Sound Clean Air Agency**

**SUBJECT**

**Staff Report**

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### **Focus Topic Icon Key:**



Diesel Emission Reduction



Opportunities to Reduce Emissions and Exposures



Transparency & Information Sharing



Working with Tribal Nations and Tribal Organization



Community Science & Education



Compliance Engagement & Assistance

### Honorable Board Members:

Below is a list of timely and important updates of progress towards the objectives in our Strategic Plan, organized by objectives.

### **SECTION ONE – PROTECT AND IMPROVE AIR QUALITY AND PUBLIC HEALTH, REDUCE AIR POLLUTION DISPARITIES, AND PROTECT OUR CLIMATE**

#### ***Objective 1.1 – Meet and Surpass the Health-Based National Ambient Air Quality Standards***



As part of their deregulatory agenda, the US EPA filed a motion on November 24th in the DC Circuit to vacate the most recent revision to the annual fine particle (PM<sub>2.5</sub>) standard, adopted in early 2024. That revision strengthened the standard to 9 micrograms per cubic meter.

Vacating it would restore the previous level of 12 micrograms per cubic meter. This change, if it prevails, does not directly affect our attainment status, as PM2.5 levels in our region are below both levels.

### **Objective 1.2 – Measure, Analyze, and Communicate Air Quality Risk**



With electrical work completed last month, our new Kent site is now collecting air quality data at Neely-O'Brien Elementary. The previous monitoring site at James Street and Central Avenue had been in operation since the mid-1980s. This new installation replaces the old location and was supported by funding from the EPA's Inflation Reduction Act.

We shared our work with youth from Shorecrest High School regarding our air quality characterization and our community engagement with sensors. This school serves areas within Ecology's Overburdened Communities in North Seattle and Shoreline.

This month, we shared the latest greenhouse gas inventory with the Pierce County Alliance for Sustainable Climate Action. This inventory models the year 2022 and is also included in our final Comprehensive Climate Action Plan.

### **Objective 1.3 – Reduce Inequities in Air Pollution and Effectively Engage on Air Quality Topics**

PSCAA's community sponsorship program continues to attract applicants throughout the region. This past month we issued one sponsorship in the amount of \$10,000 to The Service Board, in support of their community fundraising event to support 2026 youth and young adult programming—specifically to address increased interest in climate education, advocacy and opportunities for green pathways to youth in overburdened communities. We also plan to co-host a workshop on climate in the spring of 2026.

Please continue to spread the word about our community sponsorship program to organizations seeking to advance clean air and public health across our jurisdiction. Visit our website for more information: [Community Sponsorships | Puget Sound Clean Air Agency, WA](https://www.pscaa.org/community-sponsorships).

### **Objective 1.4 – Reduce Greenhouse Gas (GHG) Emissions to Reduce Our Region's Contribution to Climate Change**



We are proud to share that the Agency successfully submitted the Final Puget Sound Region Comprehensive Climate Action Plan (CCAP) to EPA on November 25, 2025. Submittal of the Final CCAP represents a significant milestone in the Climate Pollution Reduction Grant (CPRG) Phase I planning grant,

and an important opportunity for regional and state collaboration on climate action. The Final CCAP and other resources are posted on the Agency's website.

To celebrate this accomplishment, the Agency hosted an in-person CCAP Celebration meeting with jurisdiction and organizational partners across the region on December 9<sup>th</sup> at the Museum of Flight in Seattle. The goals of this meeting were to continue to build and solidify relationships across governments and stakeholder groups, demonstrate regional coordination to state partners, provide awareness around key emission reduction measures and implementation considerations, and identify next steps for future regional coordination efforts around implementation.

The Agency has started to develop a communication strategy to share the Final CCAP with partners across the region and state. Please help spread the word. See the "News Worth Sharing" section of this report.



Agency staff also continue to lead the development of a regional electric vehicle charging infrastructure plan for light-, medium-, and heavy-duty vehicles. The Agency has selected DKS Associates, with subcontractors Cascadia Consulting Group and the University of Washington Sustainable Transportation Lab, to develop the plan as the winning bidder of a Request for Proposals. The DKS Associates proposal stood out for the team's relevant expertise, commitment to leveraging existing resources, and robust approach to engaging stakeholders, analyzing data, and creating actionable recommendations.

The Agency has finalized a contract with DKS Associates and is beginning project kickoff and development activities. The first phase of the project will involve

engagement with relevant stakeholders to better understand their needs for the scope and contents of the plan. Information on opportunities for involvement will be shared through Agency networks and the Regional Electric Vehicle Collaborative listserv. Go to PugetSoundREV.org to sign up for emails.

In another deregulatory effort, the National Highway Traffic Safety Administration (NHTSA) has proposed rolling back the [current CAFE](#) (Corporate Average Fuel Economy) standards for light-duty vehicles. Light-duty vehicles are a substantial portion of the transportation sector's contribution to greenhouse gas emissions. The proposal would replace the prior goal of around 50 miles per gallon (mpg) by 2031 with a lower fleet-wide target of 34.5 mpg. The proposal will undergo a 45-day public comment period after Federal Register publication.

#### ***Objective 1.5 – Prevent, Reduce, and Control Emissions and Exposure from Stationary Sources and Other Regulated Activities***



The Registration and Operating Permit program's annual invoices for calendar year 2026 were mailed on November 21<sup>st</sup>. There were over 2,800 invoices sent, and the fees included in these invoices reflect the program fees adopted at the April 2025 Board meeting. These fees support the ongoing compliance work our staff perform with these sources during the coming year. These invoices are created through the use of information collected and stored in our compliance database along with applications that produce the individual invoices as PDF documents from that data.

#### ***Objective 1.6 – Reduce Harmful Wood Smoke Emissions and Exposure***



The Wood Stove Recycling Program of Puget Sound (WSRP) continues to reward homeowners throughout our four-county jurisdiction who recycle their old, polluting wood stoves. Since September, nearly 350 households have enrolled in the program, and over 140 old wood stoves have been recycled. In addition to the \$500 recycling reward, participants and their neighbors will start the new year breathing cleaner air both inside and outside of their homes.

To help increase awareness of and participation in the wood stove recycling program, the Agency has contracted with D2 Creative to launch a digital and social media outreach campaign. These efforts will increase our ability to reach households who heat their homes with wood, particularly those in priority communities experiencing disproportionately poorer air quality from wood smoke. The first social

media ads launched on Meta/Facebook in mid-November. In the coming months, advertising of the program will expand to Google, X, and Nextdoor.

We've officially entered wood smoke burn ban season and wrapped up the month with a mild November. We've completed internal coordination to ensure we're prepared to issue burn bans if conditions warrant.

#### ***Objective 1.7 – Reduce Harmful Diesel Pollution Emissions and Exposure***



Agency staff continue to coordinate with project partners to complete yard truck replacement projects under the Agency's Diesel Emission Reduction Act (DERA) grant. Lineage Logistics successfully deployed their new all-electric yard truck in the Duwamish Valley in September.

This month, they are preparing the documentation to show proof of scrapping their old diesel truck, which will allow them to receive reimbursement from the grant for up to 45% of the cost of the new truck. Other project partners, BNSF and King County Solid Waste, continue to progress with their yard truck replacement projects. BNSF expects delivery of three electric yard trucks in December 2025, and King County Solid Waste anticipates delivery of two trucks in May 2026. Once the new electric trucks are in service, the old diesel trucks will be scrapped, advancing the project's goal of reducing diesel emissions and improving air quality in overburdened communities.

The Agency is seeking to build a pipeline for diesel emission reduction projects, in the event additional funding becomes available. Please help spread the word about our diesel program. See the "News Worth Sharing" section of this report.

### **SECTION TWO – VALUES IN ACTION**

#### ***Objective 2.1 – Attract, Develop, and Inspire Talented Staff That Reflect the Diversity of the Region and Develop a Culture of Belonging***

We are recruiting for an Inspector II position and are building an eligibility list for future position opportunities. We are currently accepting applications and will move to interviews in the next several weeks.

#### ***Objective 2.2 – Develop and Sustain a Culture that Embeds Equity Principles in Our Day-to-Day Work and Decisions***

We hosted Dr. Bryant Marks Sr. of MindMarks and the National Training Institute on Race and Equity (NTIRE) for our annual Implicit Bias training. We continue to open these trainings to our partners, and we were grateful for many guests joining us,

including several Advisory Council members. This training focuses on specific ways to identify and address implicit bias in order to minimize unintended consequences. By continuously questioning assumptions and using data for decision-making, the Agency will continue to incorporate these strategies.

***Objective 2.3 – Build and Maintain the Agency’s Long-Term Financial Strength and Ensure Accountability***

The FY 2025 annual report was completed on November 24 and submitted to the State Auditor’s Office on November 25, meeting the statutorily required deadline of 150 days after the end of the fiscal year. As a reminder, the report is not considered final until the audit is complete and the auditor’s opinion issued. This means that while unlikely, there may be some small changes to the statements depending on the results of the audit. The next several weeks will be spent documenting processes and identifying opportunities for efficiencies. In addition, budget season is not far off and finance staff have begun internal discussions on the plan for the FY 2027 budget.

***Objective 2.4 – Develop and Implement Technology To Succeed***

We previously reported that we had successfully established an off-premise datacenter as part of our strategic plan to separate our I.T. infrastructure from our office suite. The Agency was recently informed that the site described above had lost their property lease and that we would need to leave the premises by the end of March 2026. The staff paused the work on that site and re-engaged with the next qualified vendor that responded to the RFP for this service. This vendor was equally qualified to provide this service and is working with us to secure the space/service to continue this project. That effort is progressing positively and while this represents a minor delay to the project, we are confident that we will be out of the current site before that March deadline. Also, we are on track to have the co-location servers installed and fully operational before office relocation activities become active next year.

***Objective 2.5 – Model Environmental Sustainability***

Work is ongoing.

***NEWS WORTH SHARING***

The Final Puget Sound Region Comprehensive Climate Action Plan is now available for jurisdictions, organizations, and other stakeholders across the region to serve as a guiding roadmap for coordinated climate action. See the plan and other important resources online: [pscleanair.gov/ClimateEngagement](http://pscleanair.gov/ClimateEngagement)

Calling all diesel equipment owners! The Puget Sound Clean Air Agency partners with organizations in King, Kitsap, Pierce, or Snohomish Counties to find funding for diesel emission reduction projects and bring cleaner air to our communities. Learn more and submit your project ideas: [www.pscleanair.gov/GrantOpportunities](http://www.pscleanair.gov/GrantOpportunities)

**2026 BOARD MEETING DATES**

January 22  
February 26  
March 26  
April 23  
May 28  
June 18 – In Person Board Meeting  
July 23  
September 24  
October 22  
November 19 – Board-Advisory-Council Joint Hybrid Meeting  
December 17

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Christine S. Cooley".

Christine S. Cooley  
Executive Director