

**From:** [fshwiller@yahoo.com](mailto:fshwiller@yahoo.com)  
**To:** [Community and Economic Development](#)  
**Subject:** "Street wastewater capacity upgrade A street between 7th and 17th street  
**Date:** Saturday, August 23, 2025 10:13:21 AM

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**[CAUTION - EXTERNAL EMAIL]**

I have some concerns about how the contractor will prosecute the project. I live at 733 W 9th which is east of A street. This section of road dead ends above Tum Water. My concern is access to my house. I need to have access by car from my house out of the neighborhood, my wife has limited mobility. I raise this concern because during the last major snow storm which dropped about two feet of snow the city road department could not be bothered to clear the short section of road for at least five days. I ended up having to shovel a path a "truck width from my driveway to A street and thru a large berm of snow at A street. I expect better service especially with the amount of property tax I pay. I look forward to the sewer being replaced.

Fred Shwiller  
733 W. 9th St.  
Port Angeles, WA 98363  
Phone (360) 775-9385

**From:** [SEPA](#)  
**To:** [Community and Economic Development](#)  
**Subject:** ORCAA Comments on 25-0121 SEPA Checklist Notice of Application 'A' Street Right-of-Way between 17th and 7th Street, Port Angeles, WA  
**Date:** Friday, August 29, 2025 9:49:28 AM  
**Attachments:** [Focus Sheet - Completing the NOC Process FINAL 11-03-2022.pdf](#)  
[Focus Sheet - When is an NOC Required FINAL 11-03-2022.pdf](#)

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**[CAUTION - EXTERNAL EMAIL]**

Good morning,

Olympic Region Clean Air Agency (ORCAA) is a local government agency charged with regulatory and enforcement authority for air quality in Clallam, Grays Harbor, Jefferson, Mason, Pacific, and Thurston counties. In general, ORCAA's approval is required before constructing an air pollution source. If you are unsure about whether a permit from ORCAA is required for this proposal, please contact our office at 360-539-7610 for assistance. Attached are two focus sheets which broadly cover when a permit from ORCAA is required, and what the process looks like once ORCAA receives a permit application. Additional information is provided below if construction or demolition/renovation is planned for the project and information regarding burn ban areas.

### Construction

For construction projects please refer to this guide for handling fugitive dust from construction projects: <https://wsdot.wa.gov/sites/default/files/2024-09/Handling-FugitiveDust-%20from-ConstructionProjects-Guide.pdf>

### Demolition/Renovation

ORCAA regulations require an asbestos survey for all demolition projects. Demolition projects by definition also include renovations performed to load-bearing structural members on the current building as part of a remodel. Prior to any demolition project, the following must be completed:

- A good faith asbestos survey must be conducted on the structure by a certified Asbestos Hazardous Emergency Response Act (AHERA) building inspector;
- If asbestos is found during the survey, an Asbestos Notification must be submitted to ORCAA and mandatory wait times must pass before the asbestos containing material is properly removed. This occurs prior to the demolition; and,

If the structure is 120 sq. ft. or greater, an ORCAA Demolition Notification must be submitted regardless of the results of the asbestos survey. There is a mandatory 14-day waiting period after ORCAA receives notification, so we recommend the applicant complete the Demolition Notification promptly after receiving the survey.

*\*These requirements are specific to ORCAA and are not synonymous with any city or county permitting jurisdiction requirements*

Helpful Links:

- A list of certified asbestos contractors is available at <https://www.orcaa.org/asbestos-demolition/asbestos-service-providers/>
- The Demolition Notification form is available at <https://www.orcaa.org/asbestos-demolition/asbestos-forms-resources/demolition-notification-form/>
- If applicable, the Contractor Asbestos Removal Application is available at <https://www.orcaa.org/asbestos-demolition/asbestos-forms-resources/demolition-notification-form/>

If you have any questions or concerns regarding the process, please contact Rob Wyland at [robert.wyland@orcaa.org](mailto:robert.wyland@orcaa.org) or by calling our main office at 360-539-7610.

Outdoor Burning

ORCAA regulations require that outdoor burning which is greater than four feet in diameter require a land clearing burning permit, if not on State or Federal lands. A land clearing burn permit must be obtained prior to burning of debris.

Please note that per ORCAA rule 6.2.3 – No Burn Areas:

No residential or land clearing burning is allowed in the following cities and/or UGAs:

Clallam	Grays Harbor	Jefferson	Mason	Pacific	Thurston
Carlsborg Clallam Bay Forks Joyce Port Angeles Sekiu Sequim	Aberdeen Hoquiam	Port Townsend Irondale Port Hadlock	Allyn Belfair Shelton	Ilwaco Long Beach Raymond Seaview South Bend	Bucoda Grand Mound Lacey Olympia Rainier Tenino Tumwater Yelm

Helpful Links:

- Information about burning is available at <https://www.orcaa.org/burning/>
- The land clearing burn permit application is available at <https://www.orcaa.org/burning/land-clearing-burn-permit-application/>
- Burn Ban status is available at <https://www.orcaa.org/>

Best Regards,

Abi Roberts, Engineer I

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*Olympic Region Clean Air Agency*

2940 Limited Lane NW

Olympia, WA 98502

Office – (360) 539-7610 x 111

Mobile – (360) 968-3166

[www.orcaa.org](http://www.orcaa.org) Please take notice that any records or communications with ORCAA are subject to public disclosure under the Public Records Act (RCW 42.56) unless exempt under applicable law.

*Please consider the environment before printing this email.*



# Focus on Air Permit Approval Process

## Process/Timeline for Air Permit<sup>1</sup> Approval

Many projects involving equipment or operations that emit air pollution require approval of an air permit by the Olympic Region Clean Air agency (ORCAA) referred to as a Notice of Construction (NOC). For information on when projects trigger this requirement, see ORCAA's focus sheet, *When is an Air Permit Required?* The NOC process is initiated by submitting a NOC application to ORCAA. The approval process may take anywhere from 15 days to several months to complete. For certain proposals, a **public notice and comment period** and **public hearing** may be required. Therefore, it is important to contact ORCAA early to get a project-specific estimate of the approval timeline. The NOC approval timeline (see back of page for flowchart) adheres to the Washington Clean Air Act (Chapter 70A.15 of the Revised Code of Washington):

### NOC Approval Process

<b>Receipt of NOC application</b>	Day 1
<b>Public Notice of the NOC application</b>	15 days from website posting
<b>Application Completeness Determination</b>	Up to 30 days from day 1
<b>Review and Preliminary Determination</b>	Up to 60 days from complete application
<b>Final Determination</b>	15 to 120 days from complete application

### Special Circumstances (if required)

<b>30-day Public Comment period triggered</b>	adds a minimum of 30 days
<b>Public hearing required</b>	adds 30 days (may run concurrent with public comment period)
<b>Project Appealed</b>	Approval may be stayed during an appeal <sup>2</sup> .

### Integration with SEPA

Many projects requiring a NOC also trigger a State Environmental Policy Act (SEPA) review. If this is the case, ORCAA cannot approve the NOC application until a SEPA determination has been issued. ORCAA recommends working with the city or county SEPA "Lead Agency" prior to, or at least simultaneously with, submitting a NOC application to find out SEPA requirements for a project. If required, ORCAA may be the Lead Agency for a project, but this is rare.

### Approval

Upon concluding a project can be approved, ORCAA will issue an Order of Approval. The Order of Approval is the air permit for the source and will include emissions and operating limits and associated requirements like monitoring, testing, recordkeeping, and reporting requirements. Final Orders of Approval issued by ORCAA may be appealed to the Washington Pollution Control Hearings Board (PCHB) within 30 days from receiving the order. Please visit the PCHB's website for procedures and details related to appeals.

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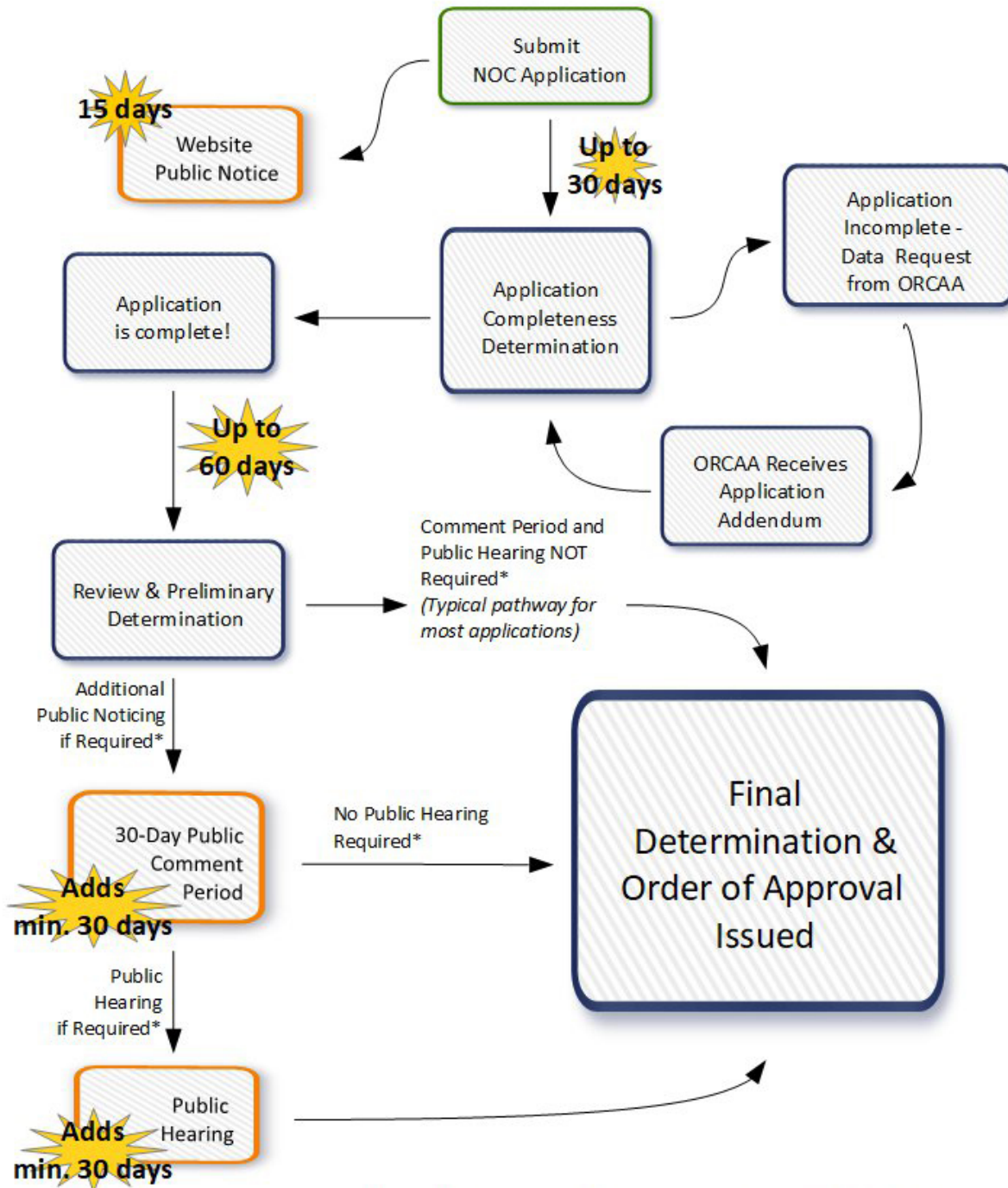
<sup>1</sup> This focus sheet covers "New Source Review" permits. Please see our website for information about Air Operating Permits for major sources.

<sup>2</sup> Effectiveness of an Order of Approval may be stayed by either ORCAA in accordance with Rule 1.8(c), or by the Washington Pollution Control Hearings Board (PCHB).



# Focus on Air Permit Approval Process

## NOC Approval Timeline Overview



\*30-day public comment period and/or public hearing may be required under ORCAA Rule 6.1.3. The 30-day public comment period and notice of hearing may run concurrently for one 30-day period.



# Focus on When an Air Permit is Required

## Approval is Required Before Constructing, Modifying, or Restarting an Air Pollution Source

Olympic Region Clean Air Agency (ORCAA) rules<sup>1</sup> require approval of an air permit application prior to commencing any of the following actions involving facilities, stationary equipment or operations that emit air pollution, which are generally referred to as “sources”:



- **New Sources** - Constructing, installing, or establishing stationary equipment, operations or an entire facility that emits air pollution.
- **Replacements** - Replacing an existing source, even “in-kind” replacements.
- **Modifications** - Modifying an existing source, which includes physical changes or changes in the method of operation of the source that have the potential to increase air pollutant emissions.
- **Replacing/Altering Control Devices** - Replacing or substantially altering any air pollution control device, like a baghouse or dust collector.
- **Restarting a Facility** - Reopening and restarting an existing facility or restarting a piece of equipment that has been shut down and not registered with ORCAA for over a year.
- **Establishing Portable/Temporary Equipment** - Moving portable, temporary equipment that emit air pollution to a facility like generators or boilers.

The purpose of this requirement is to protect public health and welfare by assuring compliance with applicable equipment performance standards, air pollution control requirements, and ambient air quality standards. Failure to secure ORCAA’s approval prior to commencing any of the above-listed actions is a violation of ORCAA Rule 6.1 and could be subject to penalty. Securing approval before starting a project helps save and protects your project from costly delays and possible enforcement. In addition, facilities that are major sources (per Chapter 173-401 WAC) may require an Air Operating Permit that must be renewed every five years.

### When is ORCAA’s Approval Required?

For all projects subject to an air permit, ORCAA’s approval is required before commencing construction or re-starting equipment that has been shut down, even when re-opening a formerly operating facility that was previously registered with ORCAA. Most often, this means before breaking ground, pouring foundations, conducting electrical or plumbing work, or moving equipment that emits air pollution to the facility. For actions that require an air permit but do not involve construction activities, ORCAA’s approval is required before initiating or taking the action. As such, ORCAA recommends against purchasing any equipment that emits air pollution (including air pollution control devices) until ORCAA’s approval is secured.

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<sup>1</sup> ORCAA rules are pursuant to requirements of Washington’s Clean Air Act under 70A.15 of the Revised Code of Washington.



# Focus on When an Air Permit is Required

## *Modifications*

Modifications requiring an air permit include both physical changes and changes in the method of operation of a source resulting in increasing emission rates or potential to emit. Some examples of modifications triggering an air permit that are changes in the method of operation include, but are not limited to:

- Changing the type of fuel combusted
- Changing to a raw material containing a new or higher concentration of a substance
- Changing operation of an existing piece of equipment
- Increasing production rates above those previously approved by ORCAA
- Rebuilding a piece of equipment or control device after a fire or other catastrophic event
- Removing a “bottle-neck” in a process resulting in increasing air pollutant emissions

## *Restarting a Facility*

Facilities that have been shut down (ceased operation for more than 12-months and not registered with ORCAA) must submit an air permit application and secure ORCAA’s approval prior to commencing construction or re-starting equipment as described above. If construction activities are not involved to restart a facility, ORCAA’s approval is required prior to starting operation.

## *Are there any exemptions?*

Yes. ORCAA’s Rule 6.1(c) lists over 100 categorical exemptions or you may qualify for an exemption based on de minimis emissions under ORCAA Rule 6.4, which is a streamlined process for projects with minor air emissions. Call ORCAA for details on exemption, (360) 539-7610 or [www.orcaa.org](http://www.orcaa.org)

## **Approval Process**

The air permit required in all cases described above is a “New Source Review” permit referred to as a Notice of Construction (NOC). The NOC process is initiated by submitting a **NOC application** to ORCAA. The approval process may take anywhere from 15 days to several months to complete (see ORCAA Focus Sheet: Air Permit Approval Process). For certain proposals, a **public notice and comment period** and **public hearing** may be required. Therefore, it is important to contact ORCAA early to get a project-specific estimate of the approval timeline. The general NOC approval timeline follows the timeline allowed under the Washington Clean Air Act (Chapter 70A.15 of the Revised Code of Washington).

Upon concluding a project can be approved, ORCAA will issue an Order of Approval. The Order of Approval is the air permit and will include emissions and operating limits, and associated requirements like monitoring, testing, recordkeeping, and reporting requirements. Final Orders of Approval issued by ORCAA may be appealed to the Washington Pollution Control Hearings Board (PCHB) within 30 days from receiving the order. Please visit the PCHB’s website for procedures and details related to appeals.

## *Does ORCAA offer application assistance?*

Yes. Information specific to industry categories that are common air pollution sources are provided under ORCAA’s Business Assistance web page, [www.orcaa.org](http://www.orcaa.org). You may also contact ORCAA’s Engineering Staff directly to ask questions regarding your proposed project, (360) 539-7610.



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Southwest Region Office  
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

September 2, 2025

Courtney Bornsworth, SEPA Contact  
City of Port Angeles  
Community and Economic Development  
PO Box 1150  
Port Angeles, WA 98362

Dear Courtney Bornsworth:

Thank you for the opportunity to comment on the optional determination of non-significance for the 'A' Street Wastewater Capacity Upgrades Project (1486) located between 17<sup>th</sup> Street and 7<sup>th</sup> street as proposed by City of Port Angeles - Public Works & Utilities Department. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

**SOLID WASTE MANAGEMENT: Derek Rockett (360) 995-3176**

All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department or Department of Ecology for proper management of these materials.

**WATER QUALITY/WATERSHED RESOURCES UNIT: Jacob Neuharth (360) 706-4599**

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or storm drains that lead to waters of the state. Discharges must not cause or contribute to a violation of surface water quality standards, groundwater quality standards, sediment management standards, and human health-based criteria. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

If there are known soil/ground water contaminants present on site, additional information will be required to be submitted. For contaminated construction sites, contact Evan Wood at [evan.wood@ecy.wa.gov](mailto:evan.wood@ecy.wa.gov), or by phone at (360) 706-4599.

Construction Stormwater General Permit:

The following construction activities require coverage under the Construction Stormwater General Permit:

Courtney Bornsworth

September 2, 2025

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1. Clearing, grading and/or excavation that results in the disturbance of one or more acres and discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more and discharge stormwater to surface waters of the State.
  - a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, and discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that
  - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
  - b) Reasonably expects to cause a violation of any water quality standard.

Some projects may be eligible for coverage under an Erosivity Waiver if they result in the disturbance of under five acres, are not a portion of a common plan of development, and the entire period of construction activity occurs between June 15 – September 15. Additional requirements about the Erosivity Waiver may be found in Section S1.F of the Construction Stormwater General Permit.

Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice. Applicants may apply online or obtain an application from Ecology's website at: <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Construction-stormwater-permit>.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(CNS:202503440)

cc: Derek Rockett, SWM  
Jacob Neuharth, WQ

**From:** [renalclark@yahoo.com](mailto:renalclark@yahoo.com)  
**To:** [Shannen Cartmel](#); [Community and Economic Development](#)  
**Subject:** "A" Street Wastewater upgrade  
**Date:** Tuesday, September 2, 2025 11:42:26 AM

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**[CAUTION - EXTERNAL EMAIL]**

City of PA,

I am writing this letter on behalf of my mother Nancy Hilt at 810 West Tenth Street. She doesn't use a computer.

I understand that the City of Port Angeles is in the process of upgrading the sewer system on "A" Street. I commend the city for making sure that things are in good repair. However, installing ADA ramps on all the intersections is a waste of money when there are no sidewalks on the whole length of "A" street other than the intersection of 8<sup>th</sup> and "A". The whole of the West Side of Port Angeles has never had sidewalks other than part of 8<sup>th</sup> and parts of "C". You will have to remove years of landscape from the homes on the West Side of Port Angeles and that's not going to set well with people. Have you even been on this side of town walking thru the neighborhoods? The city hasn't made a point of those who even park up off the street in the "right a ways" blocking vision for drivers turning onto "A". You need to reconsider not adding ADA ramps to nowhere. This is just one way to get more money from people that don't have it on this side of town.

Consider,  
Nancy Hilt  
By Daughter Rena Clark