From:	Aran Enger
To:	Public Comment
Subject:	Lenz Compost - SEPA Comments from SHD
Date:	Tuesday, April 27, 2021 3:29:54 PM
Attachments:	image001.jpg image002.jpg

The Snohomish Health District is in the process of reviewing an application from Lenz Enterprises Inc to modify its existing Solid Waste Permit (No. SW-106).

Aran Enger, REHS *| Safe Environments | Environmental Health |Snohomish Health District*
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From:	Brandt-Erichsen, Svend
To:	Public Comment
Subject:	Lenz Enterprises, Inc. Composting -- Comments on Draft Order of Approval
Date:	Wednesday, April 28, 2021 2:29:47 PM
Attachments:	image001.png Lenz SEPA Comment Letter (2021-04-28).pdf

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Please accept the attached letter as comments on draft order of approval **11753**, regarding the proposed expansion of the Lenz Enterprises, Inc. composting operation.

Thank you -

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VIA EMAIL

April 28, 2021

Carole Cenci
Senior Engineer
Puget Sound Clean Air Agency
1904 3rd Avenue, Suite 105
Seattle, WA 98101

Re: Inadequate Analysis for Lenz Enterprises, Inc. Compost Facility Expansion, Proposed OAC No. 11753

Dear Ms. Cenci:

Lenz Enterprises, Inc. (Lenz) has applied to Puget Sound Clean Air Agency (PSCAA) for an order that would authorize a permanent five-fold increase in processing volume for the Lenz composting facility. I am submitting the following comments on the proposed action on behalf of individuals who reside on Camano Island and are adversely affected by the Lenz composting operation.

In conjunction with the public comment period on proposed OAC No. 11753 for the Lenz expansion, PSCAA has released a draft "determination of nonsignificance" (DNS) for the project. PSCAA must withdraw the draft DNS. Only a determination of significance (DS) and preparation of a detailed environmental impact statement will satisfy SEPA requirements. PSCAA should find that the proposed project would have a probable significant adverse impact on the environment,[1] issue a determination of significance, and initiate scoping for an EIS.[2]

PSCAA has used the wrong baseline for SEPA analysis

Before 2010, the Lenz composting facility was permitted to process 30,000 tons of organic feedstocks a year. Lenz made changes to the facility in 2010 that tripled its processing capacity, without first obtaining an approval order from PSCAA. PSCAA issued a *temporary* order on April 1, 2014 (OAC No. 10494) that authorized the facility to use its illegally expanded capacity and operate at 75,000 tons per year while collecting odor data and other information. OAC No. 10494

[1] *See* WAC 197-11-794(1), 197-11-330(2)(b).
[2] *See* WAC 197-11-360

required Lenz to submit a Notice of Construction Application before December 1, 2015. Lenz was allowed to operate at the higher volume only while PSCAA considered that application.

Lenz submitted a NOC application for permanent approval of the increase before the deadline, and so has been allowed to continue to operate at up to 75,000 tons a year under the temporary order. However, PSCAA never approved that application. Lenz was never granted permanent approval to operate at the higher volume. Indeed, PSCAA's NOC Worksheet indicates that part of the current action is to grant permanent approval for the increase to 75,000 tons per year.

Lenz then submitted a new NOC application in February 2019, seeking to increase processing volume yet again to 150,000 tons a year. The NOC worksheet indicates that PSCAA is acting on both the application for a permanent increase to 75,000 tons that Lenz submitted in late 2015, and the application to increase again to 150,000 tons that Lenz submitted in 2019.

No SEPA analysis was ever completed on the adverse environmental effects of a permanent increase from 30,000 to 75,000 tons per year. It appears that PSCAA never made a SEPA threshold determination for OAC No. 10494, presumably because it was an administrative enforcement action.[3] Even if a SEPA analysis was completed before issuing that order, it could only have considered the effects of a temporary increase in processing capacity, since the order did not purport to authorize a permanent increase. As a result, the correct baseline for the current SEPA analysis is 30,000 tons a year. PSCAA's proposed action permanently authorizes not a doubling, but a five-fold increase in Lenz's processing volume, from 30,000 to 150,000 tons per year.

If PSCAA denied the current application, Lenz would revert to a maximum capacity of 30,000 tons a year, not the 75,000 tons a year temporarily authorized by OAC No. 10494. Thus, for SEPA purposes, "no action" is processing a maximum of 30,000 tons a year, not 75,000 tons. Since OAC No. 10494 was only a temporary authorization, the correct baseline for SEPA analysis is the original processing capacity of 30,000 tons per year. PSCAA's "action" for SEPA purposes is the proposed approval of a permanent increase in processing capacity from 30,000 to 150,000 tons a year.[4] Thus, PSCAA's SEPA threshold determination, which was based on an increase from 75,000 tons rather than 30,000 tons, is fundamentally flawed and must be redone.

The magnitude of the Lenz proposal represents a significant increase in the types and levels of activities that would be permanently authorized at this site. In SEPA terminology, it would be reasonably likely to have more than a moderate adverse impact on environmental quality.[5] A five-fold increase in potential odors and other air emissions, traffic and stormwater impacts all are significant and should be analyzed in an EIS. PSCAA cannot make a DNS for an increase in operating capacity of this magnitude.

[3] Administrative civil enforcement actions are not "actions" subject to SEPA review. WAC 197-11-704(3).
[4] See WAC 197-11-704(1)(a) and (2)(a).
[5] See WAC 197-11-794.

Lenz is not complying with its temporary permit

Lenz appears to be currently operating in violation of its existing, temporary 75,000-ton limit on its processing capacity. Cities and counties have reported sending solid waste to Lenz for composting that exceeded Lenz's permit limit by 40 percent in 2020, and by almost 20 percent in 2019.[6]

Lenz should be required to comply with existing limits before PSCAA considers authorizing an expansion. Allowing Lenz to ignore permit limits also makes a mockery of the SEPA process. PSCAA has included a number of conditions in the proposed OAC to reduce potential environmental impacts. These include no detectable odors outside the property line, no stormwater discharges to groundwater and surface water, and a limit on daily and annual truck trips. Lenz has a demonstrated track record of not complying with air permit requirements, having expanded its processing capacity without obtaining approval from PSCAA, and now exceeding its temporarily authorized processing capacity by up to 40 percent.

PSCAA should issue a DS and develop a detailed EIS to document the actual operating practices at the Lenz facility before considering authorizing a permanent five-fold increase in processing capacity.

The proposed expansion would have a significant adverse impact on air quality

Compost odors are already problematic on Highway 532 near the facility. The SEPA checklist claims that the composting operation will use covered aerated static piles (CSAP) connected to engineered biofilters to control air emissions. However, this is only true for the first stage of the composting process. The second phase of composting would be in uncovered, uncontrolled windrows. Indeed, Lenz proposes more than doubling its Phase II capacity and more than tripling the area occupied by Phase II compost (from 1.65 acres to 5.72 acres).

Lenz touts the shift from a mass bed to windrows for Phase II as allowing more surface area and exposure to the atmosphere, but that also means a significant opportunity for increased odors, as well as increased air emissions. Lenz has not supported its application with any evidence of the air emissions and odors expected from the Phase II windrows. However, the file includes 2013 odor samples from mass bed Phase II compost as high as 902 dilutions to threshold (D/T), or odor units. Other readings included 352 and 418 D/T. With greater surface area, the proposed windrows can be expected to generate more odors than the mass bed operation. There is no indication that PSCAA has given any consideration to this significant increase in odor impacts.

PSCAA also has underestimated the VOC emissions from the proposed use of windrows with no emission controls. PSCAA has arbitrarily assumed that only 10 percent of the facility's VOC emissions will come from the uncontrolled windrows. But recent studies suggest as much as half

[6] Cedar Grove Composting, Inc. letter to PSCAA and Snohomish Health District (March 25, 2021).

of the facility's VOC emissions will come from Phase II composting.[7] PSCAA's erroneous assumption regarding the uncontrolled emissions from the windrows is significant, as increasing the percentage of emissions attributed by Phase II to 20 percent of the facility's VOCs, or even 15 percent, would likely result in the Lenz facility becoming a Title V major source.

PSCAA also does not appear to have given any consideration to requiring emission controls on the Phase II windrows, even though other composting facilities use negative aeration or positive aeration with Gore covers for their Phase II operations.

All of these air emission issues suggest that PSCAA needs to revisit its air permitting decision. They also add to the reasons for PSCAA to withdraw its proposed DNS and instead determine that the proposed increase in air emissions would have a more than moderate adverse impact on the environment. PSCAA should issue a DS and require preparation of an EIS to evaluate the adverse environmental impacts of the proposed expansion and how those impacts could be mitigated, by for example controlling emissions from the proposed five acres of windrows of partially composted solid waste.

The SEPA Checklist makes unrealistic claims regarding traffic impacts

The SEPA checklist claims that the expanded compost operation will not generate any additional vehicle trips per day. Transportation, 14.f. All that Lenz has provided to support this assertion is a table. Reviewing the math presented in that table, it is apparent that Lenz simply assumed that every truck trip to and from the facility would be made by fully loaded trucks of the largest class.

Lenz assumes that trips to the facility will be made by Class 8 trucks with an average load of 28 tons. Dividing the 150,000 tons of processing capacity they have requested by 28 tons equals 5,357 – the annual number of truck trips to the facility provided by Lenz. Thus, the truck trip figure Lenz provided assumes that all deliveries will be made by the largest class of trucks. However, in its narrative Lenz states that it will still take deliveries from smaller packer trucks from northern Snohomish County and southern Skagit County. There is no room for those deliveries in its trip count. Lenz also currently receives deliveries from route trucks, which have a 10 ton capacity – as much as 3,000 tons, which translates to at least 300 truck trips. Those deliveries are not mentioned in its traffic analysis, nor are trucks delivering "paunch waste," another component of Lenz's current waste stream.

The same limitation to large truck shipments occurred in the Lenz estimate of trips leaving from the facility. Dividing the production of 132,104 cubic yards (CY) by the 75 CY average load size Lenz provides for Class 8 trucks equals the 1,761 annual trips from the facility that Lenz provided. However, the narrative that Lenz provided says that some of the compost is shipped out from the site in smaller, Class 5 vehicles that are not owned by Lenz. Lenz predicts that "the majority" of

[7] San Joaquin Valley Air Pollution Control District, *Greenwaste Compost Site Emissions Reduction from Solar-powered Aeration and Biofilter Layer* (May 14, 2013)

increased compost sales will be in its own larger trucks, but intends to continue selling smaller loads to others.

Also missing from the Lenz analysis is any validation of its estimate of current truck trips. The claim that a 100 percent shift to large trucks will avoid an increase over current traffic levels starts from the premise that the figures Lenz has provided for current trips is accurate. Lenz has not provided any data to support its current traffic figures. Moreover, since Lenz has appeared to exceed its permitting processing volume for at least the last two years, any traffic figures for 2019 or 2020 include more volume – and so more truck trips - than was authorized by its temporary air permit. The baseline is inflated, assuming it is accurate.

While PSCAA has proposed limiting annual trips to the combined number of in-bound and out-bound trips projected by Lenz, those estimates simply are not credible. They also are not backed by any analysis, other than the most simple math and bare assertions regarding current traffic levels. Lenz has demonstrated a willingness to ignore permit limitations on processing volume. There is no reason to believe Lenz will comply with its own unrealistic traffic estimates, nor that it will actually achieve

Lenz should be required to complete a traffic study that, at a minimum, consists of a traffic generation and distribution analysis. *See* SCC 30.66B.035(5). The traffic study should be completed by a competent firm. The existing analysis is no better than something sketched out on the back of a napkin. Finally, the results of the analysis should be incorporated into an EIS, so that there is a complete analysis the significance of the impact of a five-fold increase in processing volume on regional truck traffic.

The proposed expansion could significantly impact local waterways

Stormwater

If stormwater from the Lenz operation is not properly managed, there is a very real danger to local Dungeness crab populations and habitat in the Port of Susan. The potential for toxic stormwater runoff into nearby waterways must be studied further and mitigation considered. This has been an issue in the past.[8] The SEPA checklist's claim that all stormwater runoff will be captured and retained within the composting operation, Water 3.d, also is refuted by the enclosed map, which is from the Lenz notice of intent to obtain coverage under Washington's general sand and gravel permit. It shows stormwater catch basins within an area where Lenz currently stores compost on the eastern side of the site that drain to the mine's stormwater settling basin, rather than the compost lagoon. Similarly, the map shows surface drainage from the western side of the

[8] In 2014, Lenz was cited by the Department of Ecology for allowing stormwater to overtop a retention pond, resulting in overflow down the steep slope to the south of the site. The same Ecology investigation identified seeps coming out of the hillside immediately downhill/ down gradient south of the Lenz site. Samples from seeps showed high levels of fecal coliform and caused Ecology to issue an Immediate Action Order.

composting area to the mine's stormwater infiltration pond. Wood and brush waste storage areas also are off of the compost operation's 8-acre pad.

The map from the sand and gravel permit NOI makes clear that any surface water leaving the composting area will be discharged to groundwater from the mine's infiltration pond. What is less clear from that map is that there are steep slopes immediately to the southwest and south of the infiltration pond and the water from the pond quickly discharges to offsite surface water. Contaminants from the organic matter have the potential to repeat the contamination of seeps on the slopes to the south that was documented in 2014. None of this is discussed in the SEPA checklist.

Surface Water

The SEPA checklist claims that there are no surface water bodies in the immediate vicinity of the site. Water, 3.a.1. In reality, the site plan in the Plan of Operations shows two wetlands on the west side of the Lenz property and a stream running from those wetlands off site. The stream is used by coho salmon. Seeps from the mine's infiltration ponds (which receive water from compost storage, wood and brush waste areas outside of the 8-acre pad) have a surface flow to agriculture ditches that run to Jorgenson Slough and the Stillaguamish River.

The SEPA checklist fails to disclose these potential impacts, which must be considered to satisfy SEPA requirements.

The SEPA Checklist misrepresents site conditions

Unstable Slopes

The SEPA checklist claims that there is no history of unstable soils in the immediate vicinity of the composting facility. Earth, 1.d. However, the entire southern perimeter of the Lenz property is mapped as a landslide hazard area by Snohomish County and listed on the property records for the site. These known unstable slopes are immediately south of the proposed composting facility. Snohomish County adopted its Landslide Hazard Map in 2016, which includes landslide areas mapped on the Lenz property. Lenz clearly knew of this hazard, yet failed to disclose it to PSCAA.

Impervious Surfaces

The SEPA checklist claims that less than 10 percent of the site will be covered with impervious surfaces after project construction. Earth, 1.g. Yet it also claims that there will be no stormwater discharges because the site will be engineered to contain all surface water, Water, 3.c and d, which can only be achieved by 100 percent impervious surfaces within the area actually under review for this permit. The misleading claim that impervious surfaces will be minimal wrongly discounts the effect of adding more than 4 acres of new impervious surfaces.

Cumulative Odor Impacts

The SEPA checklist wrongly states that there are no off-site sources of odor that may affect the proposal. Air, 2.b. In reality, Stangeland Farms, a dairy, has two operations to the south of the Lenz facility. There are two separate manure storage areas, each roughly 1200 feet from the Lenz composting operation, that total just under 3 acres. These should have been disclosed in the SEPA checklist and the SEPA analysis should have considered the potential cumulative effects of odor emissions from the composting operation and the dairy manure management. These potentially significant impacts should be evaluated in an EIS.

Inconsistent "Site" Definition

It seems that Lenz considered the "site" to be the 8-acre composting operation for purposes of surface water impacts, unstable slopes, noxious weeds (Himalayan blackberry occur all around the mine pit), and presence of fish near the site. But for purposes of impervious surfaces, odor impacts, and perhaps other resources, the entire Lenz parcel was treated as the "site." By using "sites" of different sizes for different resources, Lenz has manipulated the process and avoided disclosing potential environmental impacts. When PSCAA looks at the potential impacts of the project as a whole, it will become apparent that there are multiple significant impacts and an EIS is required.

Conclusion

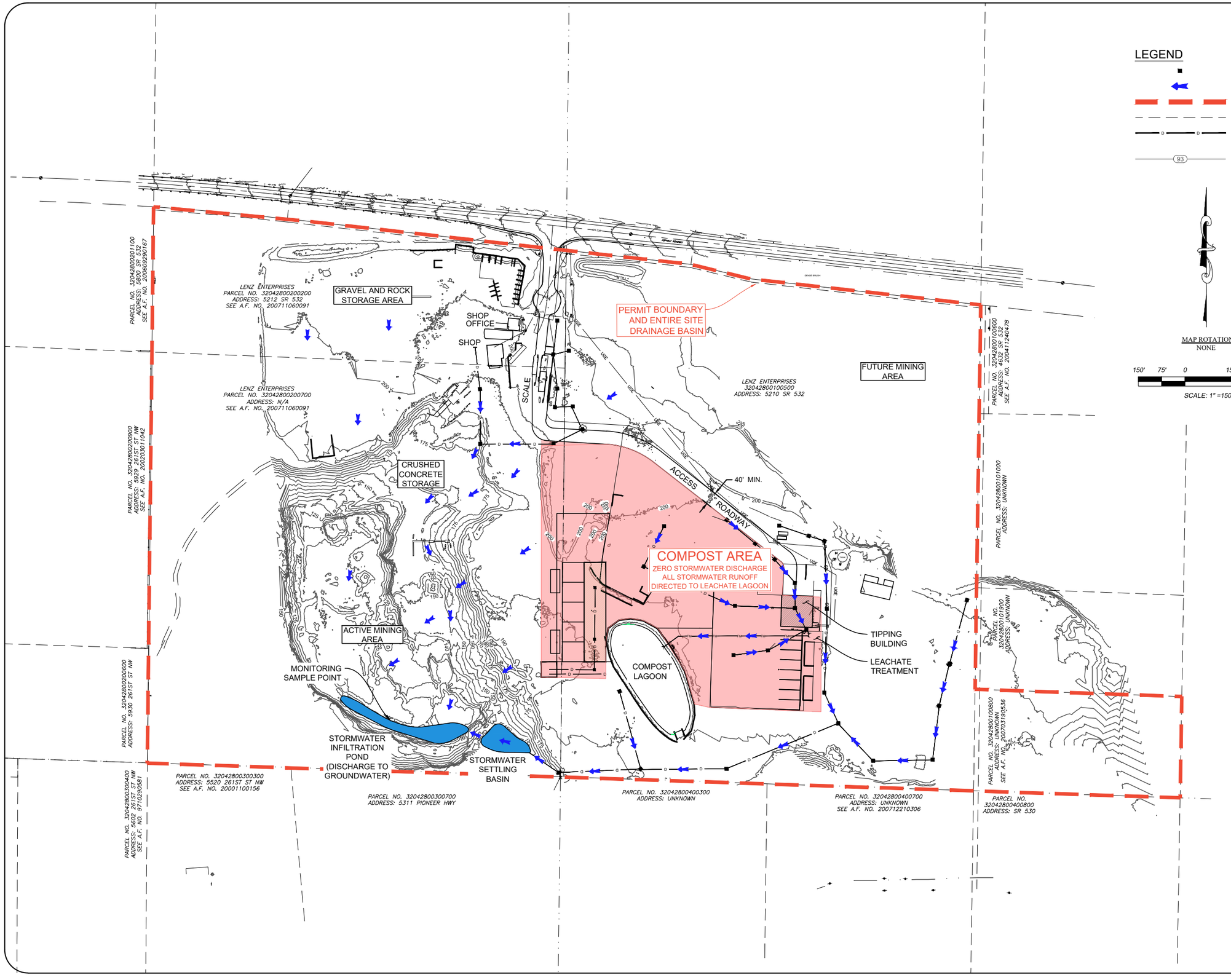
The proposed DNS for expansion of the Lenz facility is unsupportable. The magnitude of the increases in odor and air emissions, traffic, and water quality impacts would be significant. The information about the site that PSCAA relied upon in reaching its proposed decision also suffers from many flaws, including incomplete and inaccurate descriptions of unstable slopes, impervious surfaces, nearby odor sources, and nearby water bodies. PSCAA must withdraw the proposed DNS and instead require preparation of an EIS before it considers issuing an air permit for the proposed expansion.

Sincerely,

Svend Brandt-Erichsen
Nossaman LLP

SBE:io

cc: Snohomish Health District
Department of Ecology, Water Quality Division



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SCOTT IAN GOODALL
STATE OF WASHINGTON
51077
REGISTERED PROFESSIONAL ENGINEER

9-3-2020

LENZ SAND AND GRAVEL MINE NOI 2020

SNOHOMISH COUNTY, WASHINGTON

REV	DATE	BY	DESCRIPTION

PROJECT NUMBER: 20034

DESIGNED/DRAWN BY: SIG

CHECKED BY: JPC

ISSUE DATE: 09.03.20

1 OF: 1

I:\Shared\PROJECTS\20034 LENZ COMPOST FACILITY\DWG\20034 LENZ COMPOST Sand and Gravel.dwg Sep 07, 2020-9:13am

From:	Jay Blazey
To:	Steve Van Slyke; Aran Enger
Cc:	dawn.maurer@ecy.wa.gov
Subject:	Letter
Date:	Thursday, March 25, 2021 11:50:13 AM
Attachments:	image001.png image002.png image003.png image004.png image005.png Ltr PSCAA SnoHD 3.25.21.pdf

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Mr. Van Slyke and Mr. Enger,

Attached please find a courtesy copy of correspondence from Cedar Grove being mailed today.

Thank you,

Jay Blazey

Jay Blazey | General Counsel

Cell: 425.246.7352 | jayb@cgcompost.com

Office: 206.832.3017 | www.cedar-grove.com

CEDAR GROVE

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877-764-5748 | CEDAR-GROVE.COM

March 25, 2021

VIA EMAIL AND U.S. MAIL

Mr. Steven Van Slyke
Compliance Director
Puget Sound Clean Air Agency
1904 Third Avenue, Suite 105
Seattle, WA 98101-3317
stevev@pscleanair.org

Mr. Aran Enger
Snohomish Health District
Environmental Health Division
3020 Rucker Avenue, Suite 104
Everett, WA 98201-3900
aenger@snohd.org

RE: Lenz Enterprises Inc. Stanwood, Washington Commercial Compost Facility

Dr. Mr. Van Slyke and Mr. Enger:

I am writing regarding Lenz Enterprises, Inc.'s commercial composting facility in Stanwood, Washington. As you know, PSCAA's April 1, 2014 Approval Order No. 10494 limits Lenz's commercial composting operations to 75,000 tons of compostable waste annually. Snohomish Health District's solid waste permit imposes an identical limit. We understand that Lenz recently submitted a notice of construction application to PSCAA seeking approval to double that annual capacity from 75,000 tons to 150,000 tons.

Based on our review of Lenz's annual reports to the Washington Department of Ecology and publicly-available information maintained by municipalities and counties with Lenz identified as the processor, it appears that Lenz has failed to comply with the annual tonnage limit imposed by its permits from PSCAA and Snohomish Health District. Specifically, it appears that Lenz has significantly exceeded the applicable tonnage limitation in recent years and may have underreported the volumes of solid waste it accepted in its reports to the Department of Ecology. Available data from municipalities and counties indicates that in 2019, Lenz appears to have accepted more than 14,000 tons in excess of its permitted capacity, and that in 2020 Lenz appears to have accepted more than 30,000 tons in excess of its permitted capacity:

Source	2020 Tons	2019 Tons
City of Seattle	70,496	57,552
Snohomish County	7,917	14,654
Island County	554	
City of Burien	8,621	7,013
City of Mercer Island	2,817	
City of Shoreline	4,962	
City of Issaquah	1,409	1,198
City of Maple Valley	262	189
City of SeaTac	2,756	2,382
City of Des Moines	3,099	
City of Bothell	3,402	2,627
City of Carnation		
Paunch Waste		3,473
Reported to DOE		74,001
Permitted Capacity	75,000	75,000
Tons processed	**106,295**	**89,088**

Note that these totals do not include other potential tonnage including self-haul tonnage, and paunch waste accepted by Lenz historically. When all waste accepted by Lenz is accounted for, it reasonably appears that the data will show that Lenz's total accepted tonnage for many recent years was well in excess of its permitted capacity. We assume that the Agency can verify these amounts, as well as whether Lenz accepted similar volumes of waste in recent years in violation of its permits from PSCAA and Snohomish Health District.

This data raises significant concerns for Cedar Grove. PSCAA has aggressively sought to enforce a purported tonnage "limit" in its permit for Cedar Grove's Maple Valley, Washington facility. Unlike Lenz's permit, PSCAA's permit for the Maple Valley facility contains no express throughput limit. PSCAA's lack of similar enforcement action against Lenz despite what appears to be clear evidence that it is violating an express condition of its air permit raises questions about PSCAA's selective enforcement of its permits for commercial composters.

More fundamentally, the fact that Lenz appears to have been significantly exceeding its permitted capacity limit—and doing so with impunity—raises significant concerns for the greater public in the Puget Sound region at a time when Lenz is requesting approval to double its permitted capacity from 75,000 tons to 150,000 tons. If Lenz refuses to comply with the express limit of 75,000 tons in its existing permits, how can the public trust that Lenz will comply with the significantly larger 150,000 ton limit it is requesting? And if PSCAA and the Snohomish Health District have been unwilling to take enforcement action against Lenz for what appears to be clear violations of that existing limit, how can the public trust that appropriate steps will be taken to enforce the new limit requested by Lenz or any other permit conditions that are imposed in connection with this substantial increase in its capacity?

Please accept this letter as our request for information regarding what PSCAA and the Snohomish Health District have done to review the volumes of waste Lenz has accepted at its Stanwood facility for the last five calendar years. We are specifically interested in learning

whether PSCAA and/or the Snohomish County Health District have ever requested or reviewed copies of the daily "records of observations and supporting documentation" Lenz is required to maintain under its PSCAA permit, and whether PSCAA or the Snohomish Health District have determined whether Lenz has exceeded the annual tonnage limitation in its existing permits. If PSCAA or the Snohomish Health District have found that Lenz has accepted waste in excess of the 75,000 tons authorized by its permits, we would like to know whether either agency has undertaken (or intends to undertake) any enforcement action against Lenz for such violations and, if not, why not. Finally, we would like to know what measures, if any, your agencies are considering taking in connection with Lenz's pending permit applications in light of Lenz's apparent noncompliance with its permitted capacity limit.

Until this issue is resolved, we respectfully submit that it would be irresponsible to approve a permit expansion of the magnitude requested by Lenz. Cedar Grove looks forward to your agencies' responses with the expectation of basic fairness in terms of compliance and enforcement within the composting industry.

Thank you for your attention to this matter.

Respectfully,

Jay Blazey
General Counsel
Cedar Grove Composting, Inc.

CC: Ms. Dawn Marie Mauer, Washington Department of Ecology

From:	Jerry Cornfield
To:	Steve Van Slyke
Subject:	Re: Comments submitted on Lenz Enterprises application
Date:	Wednesday, April 14, 2021 10:55:01 PM

Sorry I missed your call.
I have an 8am interview. Can chat around 830 or I will get the phone turned on by 730 if you want to call before
If you need to handle the request as a public records request, that's fine.
If there is any plan to extend the public comment period and/or change the hearing date, let me know. That will give us more time to chat.

Here are my primary questions in case you need/want to respond in writing due to your schedule

-What is negative aeration mode? I am trying to describe it and I am at loss for how to explain it to our readers.

-Can the agency give its OK before Lenz gets its permit modification from the health district? Does the district wait for you guys?

-Can you tell me how many odor complaints, if any, were made against the operation from Jan. 1, 2020 to April 1, 2021?

-Truck trips. The permit info says: 37 truck trips per day (highest day, peak season) and 5,357 truck trips per year to the facility, and there will be 40 truck trips per day (highest day, peak season) and 1,761 truck trips per year from the facility.
How can there be more truck trips to the facility than from the facility when there are more truck trips per day from the facility?

-Is there a chart of info on where they currently get material?
A March letter to you from Cedar Grove contains information on tonnage received by Lenz in 2019 and 2020. Is that data accurate? If so, why did the agency allow Lenz to exceed its allowed tonnage? I'd be interested in response to the Cedar Grove assertions about inconsistent treatment of composting operations, if you're so inclined as well.

-Finally, I did not see any requirement for installing some kind of odor detection devices/air quality monitors on different parts of the site. Did I miss it or was it a conscious decision to not make such a requirement?

Hopefully we'll chat.

Thanks for considering my questions

On Wed, Apr 14, 2021 at 7:03 PM Steve Van Slyke <SteveV@pscleanair.gov> wrote:

> Jerry,
>
> I'm heading out. I will try to call you in the early in the morning, as I am in meetings all day. The comments received are not posted on the website, as that is not our practice. But I need to ask you if you want this request to be handled as a public records request.
>
> Hopefully, I will catch you in the morning.
>
> Thanks,
>
> Steve
>
> Steve Van Slyke, P.E.
> Director of Compliance
> Puget Sound Clean Air Agency
> 1904 3rd Ave., Suite 105
> Seattle, WA 98101-3317
>
> (206) 689-4052
> (206) 343-7522 (fax)
>
> SteveV@pscleanair.gov
>
> ---
>
> **From:** Steve Van Slyke
> **Sent:** Wednesday, April 14, 2021 5:39 PM
> **To:** Jerry Cornfield <jcornfield@heraldnet.com>
> **Cc:** Carole Cenci <CaroleC@pscleanair.gov>
> **Subject:** RE: Comments submitted on Lenz Enterprises application
>
> Jerry,
>
> You can call me now, if you're still available. I'm at my desk.

Steve

Steve Van Slyke, P.E.
Director of Compliance
Puget Sound Clean Air Agency
1904 3rd Ave., Suite 105
Seattle, WA 98101-3317

(206) 689-4052
(206) 343-7522 (fax)

SteveV@pscleanair.gov

From: Jerry Cornfield <jcornfield@heraldnet.com>
Sent: Wednesday, April 14, 2021 5:19 PM
To: Steve Van Slyke <SteveV@pscleanair.gov>
Cc: Carole Cenci <CaroleC@pscleanair.gov>
Subject: re: Comments submitted on Lenz Enterprises application

Can you send me or direct me to a place on your guy's website where I can see the comments that have been submitted thus far regarding Application No. 11753

Thanks

--

Jerry Cornfield
Reporter
The Daily Herald | 1800 41st Street, S-300 | Everett, WA 98203
360-352-8623 | 52220 | www.heraldnet.com

Map Media Kit Sound Info

--

Jerry Cornfield
Reporter
The Daily Herald | 1800 41st Street, S-300 | Everett, WA 98203
360-352-8623 | 52220 | www.heraldnet.com

Map Media Kit Sound Info

From: Geoff Hill
To: Public Comment
Subject: No. 11753 Lenz
Date: Wednesday, April 28, 2021 10:59:25 PM

Dear PSCAA

Composting is not a black box process. The composting process is a biological process that has a defined oxygen demand based on the mix fed into it. If the oxygen demand is met by oxygen supply, and the temperature is kept low enough to allow the oxygen to become available at the wet biofilm of decomposing waste, the process proceeds largely aerobically, making predominantly CO2 (and lots of it) and little VOCs per ton of throughput. If the oxygen demand is not met by sufficient oxygen or the temperatures are not controlled by sufficient cooling air to enable oxygen to remain dissolved in the biofilm of the waste, then the microbes switch to fermentation, reduction, and anaerobic pathways. These pathways generate predominantly VOCs in the form of alcohols, aldehydes, and other light VOCs and less CO2. There have been no studies in the USA or Europe which tie together process conditions and VOC emission factors despite this critical relationship. I am the team leader for a consulting project for CalRecycle which will attempt to tie these factors together for the first time, in 2021 and 2022.

It is not reasonable to arbitrarily assign an emission factor to a facility without first evaluating whether they can meet oxygen demand and maintain aerobic conditions. Each facility has dozens of factors which affect their ability to meet and maintain aerobic conditions; aerobic condition maintenance is affected by technology selection, feedstock, and operations. What is critical is that aerobic conditions are maintained, however we still do not know the exact relationship between these proper conditions and the resulting VOC emission factors. The best data on this topic that has been collected to date will come from Napa compost facility and will be publicly discoverable in the coming months. The emission factor based on 60,000 tons per year of food waste and green waste composted on a high rate in-ground positive aeration floor by a highly skilled operator is 0.2 lbs-VOC/wet ton feedstock. The Bay Area AQMD mandated 4 emission tests by an independent firm, and this is the resulting emission factor. From my read of the proposal, Lenz will be using a superior aeration floor, superior aeration direction (negative), with similar feedstock. Lenz are similarly skilled operators as the Napa team. Please consider this in your review of their proposal. We need to follow science when applying rules otherwise we let our opinions drive the regulations.

Geoff Hill, PHD
2067137805

From:	Edward Wheeler
To:	Public Comment
Cc:	"James Tupper"; Jason Lenz
Subject:	Comment Letter on Draft Order of Approval for Lenz Enterprises, Inc. Composting
Date:	Wednesday, April 28, 2021 1:29:12 PM
Attachments:	Comment Letter 042821.pdf

To whom it may concern.

Please find attached a comment letter on the Draft Order of Approval for Public Comment No. 11753.

Please let me know if you have any questions regarding this submission.

Thank you.

Edward Wheeler
Program Director, Lenz Enterprises
(m) 360.333.0516

Lenz Compost Facility Upgrade – Comment Letter

Legal, scientific and practical issues with the PSCAA permitting process and subsequent draft order of approval 11753

Submitted by Lenz Enterprises to PSCAA April 28th, 2021

Introduction

Lenz Enterprises applied for a Notice of Construction (NOC) permit with PSCAA in February 2019. Over approximately the next two years PSCAA processed the application and identified additional permit requirements. This was an iterative process as the PSCAA permit writer, who was new to PSCAA, educated herself on the proposed expansion of the composting operation. The permit writer acknowledged she was not familiar with the proposed process or composting in general. After approximately 20 months, the original permit writer resigned from PSCAA and was replaced. This started a new conversation that was not necessarily connected with the previous discussions and caused some discontinuities with the permitting process.

During the permitting process, PSCAA informed Lenz that they could not use site specific emissions data obtained by the Washington State Department of Ecology and Washington State University (WSU) to develop Volatile Organic Compounds (VOC) emission factors for the site. Even though WAC 173-400-103(2)(b) states: "(b) An owner or operator **must base the emissions estimate on actual test data** or, in the absence of test data, procedures acceptable to Ecology."

PSCAA represented to Lenz that in their opinion the data could not be verified and was not reliable. Instead PSCAA decided that emission factors from an internal PSCAA document, prepared from a limited literature review on facilities dissimilar in design and operation to the Lenz site, should be used to develop site-specific emission factors for the Lenz site.

PSCAA_Final Report - Compost VOC EF_EW.

The conclusions in the document are not consistent with the PSCAA air regulations and have not been peer-reviewed by any other agency. The document has significant flaws and many non-scientific assumptions and methods that render it useless in the instance of Lenz's current and proposed composting operations. Site specific data for the site, data that was collected by Ecology and WSU, should be used to determine emissions factors.

At the same time, PSCAA indicated that data from the same report could be used to develop emission factors for Hazardous Air Pollutants (HAP) and Toxic Air Pollutants (TAP) because in PSCAA's words "We don't have another source of information from which to develop these emission factors." This statement is completely erroneous, as the data acquired during the Lenz site-specific sampling for VOCs, NH3, TAP and HAP, all used the same methodology, QA/QC, and in many cases the same samples for analysis, providing a robust data set that would have tailored emission factors to both the site and the

specific composting system that Lenz proposed. The method included in the PSCAA document is arbitrary and capricious.

The development of emission factors is crucial to facility design, how the facility is operated and, ultimately, and how the facility is regulated. Lenz tried to engage PSCAA in discussions about the use of its internal study to develop emission factors, and its lack of applicability to the Lenz facility, but PSCAA made it very clear that they would be using these data and they were not open to discussion about this subject. The use of the PSCAA data to develop emission factors for the site, emission factors that were wholly inappropriate to the analysis, resulted in a set of both theoretical and extreme conditions that substantially changed the original system design and operations plan proposed by Lenz and would have required a significant permit change from a Notice of Construction permit (NOC) to designation as a Title V facility. In response to the theoretical and extreme conditions imposed by PSCAA in the flawed analysis, Lenz decided to substantially alter the proposed design and operation of the system to maximize environmental controls. The alterations come at great cost and result in operations that have not been proven by any full-scale facility. It should be noted that the operations proposed in the original Lenz application have worked well for over ten years.

After Lenz introduced the proposed change of design and operations, PSCAA continued to introduce new environmental mitigation requirements to the Lenz permit. Many of the new mitigation measures, included in the draft permit as requirements, are simply not reasonable or achievable. In addition, some of the requirements restrict or contradict the implementation of other PSCAA and Solid Waste imposed permit conditions. The requirements are not achievable because adherence is theoretical and cannot be attained while still maintaining a good composting process. An important additional consideration is that adhering to the new permit requirements could require violation of requirements of permits issued by other agencies.

Following are the primary issues associated with the proposed PSCAA permitting process. Lenz respectfully requests that the final Order of Approval be re-written based on reasonable and achievable conditions to ensure the facility can operate in compliance with all regulations.

General

There is no implementation schedule in the Order of Approval for the existing or new system to come into compliance. This lack of a transition phase creates an unreasonable and unachievable situation with the existing system design and operation. The existing system was designed to use reversing air and was never designed to maintain temperatures below 70C while also maintaining a specific moisture range, both of which are new conditions to site operations; along with the condition of negative only operations. Negative only operations with the existing system are possible, while still maintaining good composting practices, but will require significant upgrades to the aeration system. These upgrades could take up to a year to implement due to system design work, equipment manufacturing delays related to the unique nature of the equipment and COVID-19 issues, the need for significant infrastructure alterations, and the sourcing of qualified technicians. However, negative only operations with the existing system are not possible given the temperature requirements presented in the Order of Approval.

The new system, with the operational conditions cited in the permit, would be the first of its kind. There will likely be a period of testing and adjustment that will need to occur to try to meet most of the proposed conditions. If initially installed key equipment requires replacement or upgrade after

installation, then equipment delays could again be a factor. These actions could take up to a year to implement. And even with the higher air flow rates proposed for the new system, it will not be able to maintain ASP temperatures presented in the Order of Approval. Lenz cannot accept the draft order without an acceptable implementation schedule predicated on reasonable and achievable conditions.

Emission Factors

PSCAA developed emission factors from a superficial review of a selective and limited number of research documents that excluded pertinent research documents without just cause. The emission factors documented in research cited by PSCAA exceed actual emissions measured at the Lenz site (and other similar sites) and unrealistically impose additional restrictions for the site. Emission factors should be based on site specific data that realistically estimate emissions (WAC 173-400-103(2)(b)).

Emission Limits

Condition 3.a and 3.b. System Capture Efficiency

PSCAA is asking that the system capture 98% of all VOC and NH3 emissions generated in the ASP. Or, in other words, no more than 2% fugitive emissions are allowed under the draft order.

- There is no scientifically verifiable way to measure this small of a concentration of emissions with all of the environmental factors involved.
- PSCAA did not justify these values and there is no research to suggest that 2% is a significant number.
- PSCAA developed this condition without discussion with Lenz and yet is requiring Lenz to develop a method to prove this condition, which PSCAA, itself, has not shown to be achievable.

Condition 4. Biofilter Capture Efficiency

- Lenz is required to ensure a 95% removal efficiency for VOC and 80% removal efficiency for ammonia without regard for concentration. While there is literature that suggests these control levels are possible within certain ranges, biofilter capture efficiency of these constituents is completely dependent on the level of each of these constituents entering the biofilters. For example, if there is a level of 10,000 mg/L of VOC entering the biofilters, VOCs exiting the biofilter must be below 500 mg/L according to permit conditions. Both of these values are measurable with current laboratory analysis and there is research to indicate that the biofilters will be able to meet the proposed standard under these conditions. However, if the incoming VOCs were 10 mg/L, this would mean that VOCs exiting the biofilters must be below 0.5 mg/L. This concentration cannot be sampled and analyzed accurately with existing scientific instrumentation available for this application, making it impossible to confirm. This is an example of the arbitrary nature of this requirement in that it does not take into account the total emissions generated or leaving the biofilters, which is the most important aspect of how the system was designed to work and should be the ultimate goal of PSCAA for these types of facilities.

Condition 5. Detectable odor beyond the facility boundary.

- State law and regulations (WAC 173-460), and PSCAA's own regulations, allow certain levels of emissions beyond the fence line, to mix and move with regional ambient air. Many of those molecules of emissions are components that make up odors. Therefore, the requirement for "no detectable odor" beyond the fence line contradict PSCAA air regulations. Odor is a complex process that begins with the distribution of molecules into the air and ends when those molecules enter our nose and humans detect an odor. The ability to detect and determine the quality of an odor is specific to an individual and therefore cannot be confirmed or qualified without examining additional factors of odor such as hedonic tone, intensity and frequency. PSCAA has included a permit condition based on its statement that "no detectable odor" beyond the facility boundary is BACT for a compost facility; and yet has failed to supply the agencies' BACT analysis to prove this condition. A BACT analysis must undertake several steps and include a feasibility analysis; PSCAA is not exempt to these requirements. PSCAA used a small composting system (as well as unrelated facilities) as examples of BACT for this analysis. The composting example relied on by PSCAA is from a permit that is not active and not relevant to the Lenz site-specific conditions. Again, Lenz site-specific data collected by respected scientists and State agencies could have been employed to complete an analysis with a basis in science; the PSCAA BACT analysis is arbitrary and has no basis in science or a direct relationship to the Lenz site. Lenz investigation into PSCAA's BACT analysis for the site, based on what information has been provided, shows that PSCAA's requirement is neither reasonable nor achievable or, in fact, based in law.

Operational Limits

Condition 15. Aerated Static Pile (ASP) operational limits

- PSCAA has apparently taken the proposed ASP operational limits in Condition 15(a) from research documents that describe "normal operating parameters" for composting facilities in general. Condition 15(a) restricts the amount of food waste in each pile to 14%. Repeated requests by Lenz for PSCAA to justify this condition resulted in no response from the agency. There is in fact no justification for this condition, it is arbitrary and capricious and is only one of many factors that may or may not result in emission generation or the lack thereof. Additionally, PSCAA's own document suggests that food waste greater than 15% results in significantly higher emissions; without any definition of what "food waste" is, why this percentage is a critical value, or quantifies their use of the word "significant."
- The operating limit ranges in Condition 15(b) may be an appropriate aspiration goals but strict compliance with this range will not dictate emission levels. This is arbitrary and capricious.
- The bulk density of 950 lbs./yd3 in condition 15(c) may similarly be an appropriate aspirational goal but it will not control emissions.

Condition 16. a), b), c), d).

All of the requirements in Condition 16, while possibly aspirational goals for composting, are not hard and fast control parameters that ensure good composting or ensure emission control (e.g., not suitable

permit conditions). In addition, some of these conditions contradict one another or are unachievable. For example, to keep a compost pile cooler than 70C, a tremendous amount of air must be pulled through the pile. This excessive air will reduce pile moisture quickly making it difficult to maintain moisture content. Additionally, design engineers Lenz spoke with have stated that this condition is unachievable with any equipment and design that is available.

Restricting the temperature of a pile at certain stages of composting can actually increase the overall duration of the composting process leading to potentially higher emissions overall or a different emissions profile. The proposed piles of compost are up to 1600 cubic yards and 10 feet in depth. Piles such as theses always have a temperature gradient from the inside out due to environmental and operating conditions and take hours to shift the overall temperature. Operational parameters should not be dictated by the agency, especially when they are contradictory to other permit requirements (e.g., WAC 173-350-220 solid waste time and temperature requirements) or unachievable. Historic operations at the site have been shown to have low emission rates based on operational criteria already in use at the site, all of which is supported by appropriate research and literature.

Condition 19.

Daily testing of bulk density and carbon to nitrogen ratios is another example of a miss-understanding of the composting process. This is essentially "busy-work" that does not provide actionable data to the operator or the agency. Compost operators in Washington are trained to build composting piles based on a number of indicators and factors. Each of these require a trained and experienced operator that can visually distinguish the conditions of a compost pile. Estimating "the carbon to nitrogen ration based on the feedstock used to construct the pile" as required in condition 19 is simply a paperwork exercise that does not reflect the true nature of the composting pile nor yield useful or actionable information.

Condition 20.

As described above, PSCAA has not provided information on why a value of 14% food waste content is significant for the composting process. This value is arbitrary and would only be definable or verifiable with extensive sampling and testing. Compost feedstocks do not vary significantly from day to day, but seasonal variations are well known and tracked accordingly. Individual ASP pile construction within the facility varies based on available feedstocks and the individual judgement of the professionals who manage them. Verification of food waste content for "each new pile" would require significant effort for sampling and testing, composting operations would be halted awaiting results, and this could potentially violate other permit conditions for maximum holding times of feedstocks. This condition would, therefore, not be achievable and, as the required food waste content is not based in science, is arbitrary and capricious. Lenz verifies food waste content on a regular basis, based on season feedstock changes. A seasonal frequency to track these data would provide an accurate representative of food waste content and would be both reasonable and achievable.

Condition 22.

The ASP system is designed to pull ambient air (20.9% oxygen content) through the composting pile. It is obvious when this is not occurring via visual observation, duct airflow measurements and other monitoring. Daily monitoring of this parameter is again "busy-work" and is arbitrary and capricious and

not based on actual site-specific operations. An analogy to this would be to check the oil in your car every hour of operation.

Performance testing

In general, performance testing again is focused only on emission control (biofilter) efficiency and does not include overall emissions generated which is an integral part of performance expectations of the system based on system design.

Records and Other Requirements

Condition 41

PSCAA should not revoke Order of Approval No. 10494 dated April 1 2014 until the end of the compliance schedule that includes installation and optimization of new systems that will be required for the expanded composting operation. Lenz will not be able to meet the operating and emission limits proposed for the new system until the end of an appropriate compliance schedule. It is unreasonable for PSCAA to impose conditions applicable to the new system on the effective date of draft order.

From:	Tim O"Neill
To:	Public Comment
Subject:	Comments on Draft Order of Approval for Public Comment - Lenz Enterprises, Inc. Composting
Date:	Wednesday, April 28, 2021 12:46:16 PM
Attachments:	image001.png image003.png Draft Order of Approval-11753_1 Comments by T ONeill.docx

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Hello,

I have embedded my comments on this Draft of Approval document. They are visible in "Review Mode". Please let me know if you need any literature references to any of my statement herein.

Best regards,

Tim O'Neill | **President**
Engineered Compost Systems
O 206.634.2625
Instagram Facebook LinkedIn

Sign up for the ECS Newsletter

Puget Sound Clean Air Agency

Notice of Construction No. **11753**

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

Registration No. **28983**

Date

Comments visible in Review/Show Comments mode are by Tim O'Neill. President of Engineered Compost Systems.
tim@compostsystems.com

Expansion of an existing aerated static pile (ASP) and windrow/mass bed composting facility from an incoming feedstock limit of 75,000 wet tons per year to an incoming feedstock limit of 150,000 wet tons per year of agricultural organics (cow manure, bedding, and paunch); pre and post-consumer food waste; and yard waste. Substantial alteration of control equipment on existing ASPs to be negatively aerated at all times. The facility includes one existing tipping and feedstock preparation building (5,000 cfm exhaust), eight existing ASP cells (17,000 ft2 floor area total), five new ASP cells (22,000 ft2 floor area total), windrow composting area, and final product storage and curing area. Emissions from the tipping building and the existing eight ASPs will be controlled by two existing biofilters (4,256 ft2 area total) and the five new ASP cells will be controlled by two new biofilters (9,800 ft2 area total). All ASPs are negatively aerated.

OWNER	INSTALLATION ADDRESS
Jason Lenz **Lenz Enterprises Inc** **PO Box 868** **Stanwood, WA 98292**	**Lenz Enterprises Inc** **5210 SR 532** **Stanwood, WA 98292**

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.

EMISSION LIMITS

3. The aeration systems for the both the new and existing aerated static piles shall always be operated in the negative aeration mode, excluding active pile construction and deconstruction during which the aeration system can be run in positive mode. The aeration system must:
   a) Capture at least 98% of the volatile organic compound emissions generated by the aerated static piles. The owner or operator shall demonstrate compliance with this specification by the method given in Condition 30.
   b) Capture at least 98% of the ammonia emissions generated by the aerated static piles. The owner or operator shall demonstrate compliance with this specification by the method given in Condition 30.
4. All emissions captured by the negative aeration systems must be routed to a biofilter. Each new and existing biofilter shall:
   a) Provide a minimum removal efficiency of 95.0% for volatile organic compounds
   b) Provide a minimum removal efficiency of 80% for ammonia
5. No detectable odor associated with the Lenz composting facility is allowed at or beyond the facility's boundary.

Commented [TO1]: The existing ASP was not designed for 100% negative aeration, nor the was it designed to produce the aeration rates that the new ASP is designed for. It will produce lower air emissions if allowed to operate in reversing mode as it was designed to do (more cooling will be available in this mode). Additional pile surface irrigation could be implemented to quickly reduce emission during warm weather with modest changes.

But if the fundamental aeration delivery requirements of the existing ASP change, it will take months to establish what is physically possible , engineer options to modify the aeration system (if there are any sensible options), and then fabricate and install any such modifications.

Implementing the condition in this document with no period for adapting the existing CASP would cause it to be either out of compliance or shut down.

Commented [TO2]: ECS has carried out, managed and/or witnessed dozens of source tests in California, many of which were done by leading source test companies and researchers. There is no commercially available technology to assess percent capture from any type of compost facility, and certainly not from an open air facility. There is no way to demonstrate compliance with this requirement.

Commented [TO3]: This a vague yet high bar of performance. Does it mean 95% reduction in the sum-total of VOCs, or for each speciated compound? Does it exclude methane and ethane? What about BTEX type VOCs that are exhausted by diesel engines (and never biogenic)? Can the ambient VOC load into the ASP be subtracted? Is this an average performance threshold over time and across the surface? Or a requirement for each location on the Biofilter surface at all times? If it is the latter, it will be impossible to achieve given the variability of all biological processes.

An average performance level 95% is possible, but an unusually high standard to maintain 24x7x365. The air permits written by California AQMD's to regulate free standing biofilters call out 80% efficiencies. This is clearly an artifact of the arbitrarily high VOC emission factor, 5.71 lb NMNEVOC/ton of feedstock, which is based on source tests from unaerated windrows that were configured to maximize VOC emissions to grandfather in high VOC emissions levels for existing facilities before 2010 in California. Note the California Air Resources Board, that oversee the AQMD's in CA, recommends a much lower, yet still inflated, emission factor.

Commented [TO4]: This is a vague and capricious requirement. Who gets to decide what odors are "associated" with the facility? Detection sensitivity varies widely by individual. If PSCAA has the jurisdiction to manage odor, then this needs to be quantitative (based on Odor Units at the nearest receptor, a limit of 5 or 7 OU's is standard) and correlated via odor sampling and ASTM analysis coupled with dispersion modelling. Otherwise, a determination would be left up to conjecture as to the source and opinion as to if its dectable.

6. Visible emissions from grinding and screening shall not exceed 5% opacity for any air contaminant for a period or periods aggregating more than 3 minutes in any 1 hour as measured by WDOE Method 9A.

FEEDSTOCK AND TIPPING BUILDING REQUIREMENTS

7. Acceptable feedstock shall be limited to "organic material", meaning any solid waste that is a biological substance of plant or animal origin capable of microbial degradation. Acceptable organic materials include but are not limited to the following:
   a) Agricultural wastes, including herbivorous animal manure, paunch waste, shells, marijuana waste which complies with WAC 314-55-097;
   b) ASTM compostable films and containers;
   c) Yard debris;
   d) Food waste;
   e) Food processing wastes; and
   f) Wood waste as defined by WAC 173-350-100, which does not contain paint or stain, laminates, bonding agents, or chemically treated wood.

8. Incoming feedstock shall be visually inspected for contaminants prior to being accepted into the facility. The following types of feedstock are unacceptable and shall be turned away as soon as possible:
   a) Feedstock types that are not an acceptable feedstock as defined in Condition 7;
   b) Acceptable feedstock as defined in Condition 7 contaminated with material that is not acceptable for composting. Visible non-acceptable material as defined in Condition 7 observed during the inspection may render a load as contaminated unless it can be removed from the feedstock during pre-processing or can be screened from the finished compost at the end of the process;
   c) Approved feedstock decomposed or putrefied to a degree that could cause an immediate odor problem in the receiving area that cannot be mitigated by mixing and/or bulking with other materials; and
   d) Any load that is determined to have the potential to cause an immediate, unreasonable nuisance that cannot be mitigated by mixing and/or bulking with other materials.

9. For each load of feedstock received, the owner or operator shall record the following information:
   a) Feedstock type;
   b) Weight of load;
   c) Results from inspection of the load;
   d) Date and time of receipt of the load; and
   e) Name(s) of employee(s) who performed the inspection.

10. The owner or operator shall calculate and record the total weight of feedstock received on a monthly and 12-month rolling basis. The total weight of material placed into the aerated static piles, including feedstock for the composting process plus all other material (including bulking agent), shall not exceed 150,000 tons during any consecutive 12-month period. For the purposes of compliance with this condition, any finished compost that is added to the surface of the aerated static piles to act as a biofilter for emission control is not counted toward the limit.

11. With the exception of stumps, brush, and clean wood, all feedstock brought on site shall be deposited completely into the tipping building, where it shall be stored under negative ventilation until processed and removed from the building to be placed in an aerated static pile. The tipping building ventilation system must be routed to a biofilter. All feedstock, with the exception of bulking agents (which consists of stumps, brush, and clean wood), shall be premixed for composting prior to removal from the tipping building.

12. With the exception of stumps, brush, and clean wood, all feedstock shall be processed and placed in an aerated static pile within 12 hours of receipt, and no material may be stored in the tipping building overnight, except in the event of primary and back-up equipment failure. If feedstock cannot be processed within 12 hours of receipt or by the end of the workday due to primary and back-up equipment failure, the owner or operator shall perform the following actions:

    a) All remaining material shall be stored in the southeast corner of the tipping building and covered with at least 12 inches of biofilter media;
    b) The owner or operator shall notify the Agency in writing prior to the end of the workday, including the amount of material that is being stored in the tipping building and the reason(s) why the material could not be processed within the required timeframe; and
    c) The owner or operator shall maintain records of the days that feedstock could not be processed within the required timeframe, including the amount of material stored, the reason(s) why the material could not be processed within the required timeframe, and the date and time that the material was able to be processed and placed in an aerated static pile.

OPERATIONAL LIMITS

13. The owner or operator shall install and properly operate a fine water mist system on all wood grinders to control fugitive dust. With the exception of stumps, brush, and clean wood, all grinding of feedstock must occur within the tipping building.

14. The owner or operator shall route standing water and water runoff from the tipping building and the compost pads to the leachate collection and treatment system. Leachate (treated or untreated) from the compost facility shall not be used for dust suppression, but may be used for moisture addition during feedstock preparation or moisture addition during the composting process.

15. The new and existing aerated static piles shall be constructed within the following parameter ranges:

    a) Each pile shall contain no more than 14.0% food waste by weight.
    b) Carbon to nitrogen ratio shall be between 20:1 and 40:1.
    c) Bulk density shall be no greater than 950 lbs/yd^3.

16. Each new and existing aerated static pile shall be operated within the following operational limits at all times, except as described in a) through e):

    a) After the first 48 hours of initial construction of the pile, the moisture content throughout the entire pile shall be maintained between 35% and 65%.
    b) After the first 48 hours of initial construction of the pile, the temperature throughout the entire pile shall be maintained between 45°C (113°F) and 70°C (160°F), based on an hourly average.
    c) After the first 72 hours of operation, the average pH of the pile shall be maintained between 6 and 8.5.
    d) At all times, the oxygen content throughout the entire pile shall be maintained at or above 10% .
    e) At all times, each aerated static pile shall be covered with at least 12 inches of biofilter media and shall be negatively aerated, such that the ventilation system continuously vents emissions to a biofilter in accordance with Conditions 3 and 4.

17. Each new and existing biofilter shall be operated within the following operational limits at all times:

    a) The oxygen content throughout each biofilter shall be maintained at or above 10%.
    b) Each biofilter shall have a depth of at least 4 feet throughout the entire biofilter.
    c) Residence time in each biofilter shall be no less than 40 seconds.
    d) Static pressure in each duct between the fan and each biofilter shall within the manufacturer's specified range. Documentation of the range from the manufacturer shall be kept on site.

Commented [TO5]: This is an arbitrary limit that does not take into consideration the characteristics of the total mix. An allowabe 100% grass mix would be a disaster, and a 40% food waste + 60% sawdust mix would compost quickly and with very low air emissions. Stick to the standard mix BMP's established by the US Composting Council and by the Washington Organic Recycling Council.

Commented [TO6]: There is no reason to limit the upper end of C/N for the sake of controlling air emissions. The chemistry of high C/N ratio mixes will further limit air emissions.

Commented [TO7]: This level of temperature control is not achievable in any large-scale composting system. The mix is heterogeneous in both porosity and energy generation. During the first week there will always be temperatures at various locations in the pile in excess of 70C regardless of the power of the aeration system. Further, there will be batches with low energy that may take longer than 2 days to heat up to 45C (which is a non-issue for air emissions and not a regulatory concern of PSCAA). An effective and achievable regulation would specify that average oxygen levels be maintained above 15% and that the aeration control device (damper or fan) at each zone run at 100% until the average zone temperature falls below 65C, and that the average pile temperature come below 70C by end of 7 days.

Commented [TO8]: Due the heterogeneity of the mix, this should be an average O2 level, and the average level should be >15% to limit air emissions. It is not difficult to maintain this average level of oxygen with reasonable aeration rates.

Commented [TO9]: ECS has designed and built over 50 biofilters. We have never been asked to measure oxygen levels in the media, and not aware of any peer-research that examines the role of oxygen on biofilter efficiency. There are no examples of regulations with minimum oxygen levels at any facility in the USA. This limit appears to have no basis in fact.

e) There shall be no vegetation growing on the surface of any biofilter.

18. The average moisture content of each windrow shall be maintained between 40% and 65% at all times.

AERATED STATIC PILE and FEEDSTOCK MONITORING

19. Within the same calendar day that each new and existing aerated static pile is constructed, the owner or operator shall record the bulk density of the pile and the estimated carbon to nitrogen ratio based on the feedstock used to construct the pile.

20. To demonstrate compliance with Condition 15.a, during each of the first 12 calendar months of operation of the new aerated static piles approved in this Order, the owner or operator shall determine the percentage of food waste by weight by verifying the food waste content is 14 percent or less of overall weight of each new and existing pile based on the Initial compost mix composition. The owner or operator shall submit to the Agency for approval a proposed method for making this determination within 14 days of the issuance date of this Order of Approval.

21. To demonstrate compliance with condition 16.b, the temperature of each new and existing aerated static pile shall be monitored and recorded hourly. At least two temperature averaging probes shall be used per ASP, and each probe shall be capable of measuring temperatures in both the core and outer layer of the compost pile. The first probe shall be placed at approximately one-third of the pile length, and the second probe shall be placed at approximately two-thirds of the pile length. The components of the temperature monitoring system shall be calibrated and maintained in accordance with manufacturer instructions and operating manuals. If any temperature reading is outside the range identified in Condition 16.b), the system must provide both an audible and visual alarm to alert the operators.

22. To show compliance with condition 16.d, percent oxygen of each new and existing aerated static pile shall be measured and recorded each calendar day. Multiple measurements shall be made each calendar day to obtain a value representative of the overall pile.

23. All material put into the composting process shall remain within an aerated static pile until the organic material has a Solvita Maturity Index of 3.5 or greater as measured using the TMECC Method 05-08-E – Solvita® Maturity Test.

24. Once an aerated static pile has met the criterion in Condition 23, the material may remain in the aerated static pile or be moved to a windrow. For each batch of material moved from an aerated static pile to a windrow, the owner or operator shall record the results of the Solvita® Maturity Test performed to meet condition 23., which pile was moved, and the date it was moved.

BIOFILTER MONITORING

25. Starting after the first full month of operation of the aerated static piles approved under this Order, each calendar month and for each new and existing biofilter, the owner or operator shall measure the static pressure in the duct between the fan the biofilter. Each measurement for each biofilter and each test must be conducted while operating each system at manufacturer's recommended set points, including constant fan speed and all dampers in fixed and predetermined positions. The fan speed and damper positions for each test must be the same as all previous tests. The pressure monitoring equipment shall be calibrated and maintained in accordance with manufacturer instructions and operating manuals. The biofilters shall always be operated within the manufacturer's specified pressure range. After 12 consecutive months of testing if the static pressure is within the manufacturer's recommended pressure range for all measurements, the owner or operator may reduce the test frequency to quarterly. If any quarterly reading is outside the manufacturers pressure range, the test frequency immediately reverts to monthly.

26. Oxygen content of each biofilter shall be measured and recorded each calendar month, no less than 21 days apart and no more than 31 days apart, using a properly calibrated oxygen probe.

27. The depth of each biofilter shall be measured and recorded each calendar month, with no less than 21

Commented [TO10]: This data tremendously over sampled. If the aeration system is properly engineered, and the control system logs that the system is indeed running, then once the system has been characterized during start-up, the average oxygen levels in the pile will not vary beyond the document ranges going forward, and certainly not day to day. A sensible regulation would require twice weekly oxygen testing during the first three batches of compost in each zone of a new ASP. Assuming consistent oxygen level are demonstrated, and the presence of a daily log of the aeration system fault/run status, manual oxygen measurements can safely be reduced once per quarter for each zone.

Note: The control system at the Lenz CASP uses temperature feedback to try to control temperature; when the temperature is above the setpoint the aeration system keeps increasing the airflow until it drops. The airflow required to cool active compost is roughly 10 times the airflow required to oxygenate the pile. In primary composting the aeration system is constantly working to cool the process, and thus is constantly providing excess oxygen.

Commented [TO11]: Per the permit issued by the Olympic Clean Air Agency to Silver Springs Organics, the large biofilter at that facility have been measured quarterly since 2012. This data shows a very little change from one quarter to the next, and eventually approaches the backpressure limit that requires the media be changed out, or the media shrinks to a depth that triggers a change, after 10 – 12 quarters. There is no rational to test the back pressure more frequently than quarterly given how slow these change occur.

Commented [TO12]: If the pile is >15% oxygen, then air going to the biofilter is >15%. These measurements are non-standard in our industry and we unaware of any correlation between oxygen levels and scrubbing performance. Oxygen level is not used as biofilter BMP in trainings by the US Compost Council.

days apart and no more than 31 days apart.

28. The residence time for each biofilter shall be determined and recorded once each calendar quarter concurrently with the testing required in condition 30.

29. The owner or operator shall submit for Agency approval a biofilter monitoring plan providing the details of how the facility will perform the required static pressure, oxygen content, biofilter depth and residence time monitoring for each biofilter, including but not limited to, locations of the monitoring equipment, procedures for determining when the biofilter media needs to be replaced, and the number of samples, sampling locations, and procedures for measuring all required parameters. The plan must be submitted at least 60 calendar days prior to completion of construction of the new composting process area. The owner or operator must comply with the plan at all times. All changes to the plan required by the Agency shall be made to the plan within 7 calendars days of receipt by the owner or operator.

PERFORMANCE TESTING

30. The owner or operator shall have emissions tested for compliance with the capture efficiency requirements established in Condition 3 and removal efficiency requirements in Condition 4 of this Order within 180 days of the completion of construction of the new composting process areas. The emission tests described in this requirement shall be repeated at least once every calendar quarter for both the new and existing aerated static piles and associated biofilters. The testing shall be performed in accordance with the following:

    a) To demonstrate capture of ammonia and VOC by the negative aeration system serving the aerated static piles, the owner or operator shall demonstrate that all air flow through each aerated static pile is definitively flowing into the pile or by other methods required or approved by the Agency prior to the testing.

    b) To demonstrate removal efficiency, the concentrations of total VOC and ammonia, shall be measured as close to the inlet of the aeration systems as possible of each biofilter while maintaining good sampling technique to obtain a representative sample.

    c) Total VOC and ammonia concentrations shall be measured at the surface or at the subsurface of each biofilter. Sampling can be performed using calorimetric tubes, hand held organic vapor analyzer, other hand held methods, evacuated canisters, or other method approved by the Agency. The resulting measurements must be representative of the concentrations being emitted by the biofilter. Sample locations shall be distributed to provide measurements that are representative of the removal efficiency of the entirety of each biofilter. The location and method of the sampling must be in the test plan required by Condition 31.

    d) Sampling at the inlet of each biofilter shall be conducted within four hours of the sampling at the surface/subsurface of each of the corresponding biofilters.

    e) The average concentrations of VOC and ammonia in the inlet and surface/ subsurface shall be used to determine removal efficiency of each biofilter for VOC and ammonia.

    f) The total weight of material in each of the aerated static piles and the initial construction date of each aerated static pile shall be recorded each sampling day.

31. For testing conducted pursuant to Condition 30, the owner or operator shall submit a compliance test plan with the test notification submitted under Regulation I, Section 3.07(b) at least 60 days prior to the compliance test. The test plan must include a detailed description of the methods proposed for determining capture and removal efficiency as required by condition 30. The test plan must be approved before conducting the source test, and the owner or operator must follow the approved test plan. Changes to the approved test plan are acceptable as long as the owner or operator has obtained approval from the Agency prior to the start of the test. The Agency may require different test methods if needed to accurately determine the capture and control efficiencies of the biofilters.

Commented [TO13]: All air emissions sampling and analysis methods used all have limited accuracies. When the concentrations of VOCs of NH3 entering or exhausting from the biofilter approach these limits, which is common, accurately determining the "removal efficiency" is not possible. How is this to be handled?

FACILITY-WIDE REQUIREMENTS

32. The owner or operator shall inspect the entire facility for visible emissions of fugitive dust at least once per calendar day, including an evaluation of whether dust control equipment (e.g. water spray bars, water truck) is being operated in good working order. If visible emissions are observed, the owner or operator shall investigate the cause and take immediate corrective action to minimize emissions. The owner or operator shall record the date, time, and results of each inspection. If visible fugitive dust emissions were observed during any inspection, the owner or operator shall record the cause and what precautions were taken to minimize emissions.

33. The owner or operator shall conduct an inspection of its entire facility at least once per calendar day to monitor along and outside the property line for detectable odors from the facility. If odors from the facility are detected at or outside the property line during the monitoring or at any other time, the owner or operator shall take immediate corrective action to eliminate the odors. The daily inspection shall also include a visual inspection of the tipping building, each aerated static pile, and each biofilter to evaluate whether these activities are being maintained and operated in good working order. The owner or operator shall record the date, time, and results of each inspection, including any corrective actions taken to eliminate odors or maintenance performed on the biofilters.

34. Pursuant to the State Environmental Policy Act, RCW 43.21C.060, WAC 197-11-660, and Puget Sound Clean Air Agency Regulation I, Section 2.12:

    a) There shall be no stormwater discharges or discharges to ground water or surface water from the areas of the facility related to compost activities, including but not limited to the tipping building, aerated static piles, composting pads, leachate treatment system, and leachate pond.

    b) The total number of truck trips for incoming feedstock delivery and outgoing compost delivery for the compost facility shall not exceed 77 truck trips per day and 7,118 truck trips during any consecutive 12-month period. The owner or operator shall calculate and record the total number of truck trips on a daily, monthly, and 12-month rolling basis to demonstrate compliance with these limits.

COMPLAINTS

35. The owner or operator shall establish a complaint response program for complaints received regarding air quality, including but not limited to odors and/or fugitive dust, as part of an Operation and Maintenance (O&M) Plan. The program shall include a complaint phone line, criteria and methods for establishing whether the Lenz facility may be the source of the air emissions related to the complaint, and a format for communicating results of investigation and advising complainants of Lenz's corrective actions.

    a) The owner or operator shall record and investigate complaints received regarding air quality as soon as possible, but no later than one working day after receipt.

    b) The owner or operator shall correct any problems identified by these complaint investigations within 24 hours of identification or cease operation of the equipment until the problem is resolved;

    c) Records of all complaints received regarding air quality issues shall include information regarding date and time of complaint; name and address of complainant (if known); nature of the complaint; investigation efforts completed and basis for conclusion reached; and date, time, and nature of any corrective action taken.

    d) The owner or operator shall operate and maintain a meteorology station capable of measuring and recording temperature, wind speed, and wind direction.

OPERATION & MAINTENANCE

36. The owner or operator shall develop an O&M Plan consistent with the requirements of Regulation I, Section 5.05(c). The plan must address procedures for determining when the composting systems, tipping building, and biofilters are operating properly and the corrective actions that will be taken when they are not.

37. The owner or operator shall have the operations and performance of the tipping building overall, including the air handling system and the performance of the biofilter to which the tipping building is vented, reviewed and evaluated by an independent third party at least once every 12 months. The first review required by this condition shall be conducted within 90 days of the completion of construction of the new composting process areas. The independent third party in conjunction with Lenz shall develop a proposed evaluation plan and proposed report format and submit these to the Agency for approval at least 90 days prior to the first evaluation. A copy of each written evaluation report shall be submitted to the Agency no later than 45 days after the evaluation date. The evaluation shall include, but is not limited to:

    a) Operational condition and integrity of the tipping building exhaust/capture system extending from the entrance to the tipping building to the point at which the exhaust enters the biofilter, including an evaluation of whether additional fan capacity is needed to adequately capture emissions.

    b) Operational condition and integrity of the biofilter to which the tipping building is vented.

    c) Adequacy and effectiveness of the system maintenance program and practices, including repair history and troubleshooting efforts.

    d) An assessment showing that the existing biofilters are adequately draining to ensure that the beds are not becoming waterlogged.

    e) Actions taken to address any issues or concerns found

    f) Recommendations for continuous improvement of the integrated system operation.

RECORDS AND OTHER REQUIREMENTS

38. All records of observations and supporting documentation required by this Order of Approval shall be completed contemporaneously and no later than the end of each day. Each inspection and observation required on a daily basis by this Order shall be completed for each operational day for the site. An operational day is defined as any day that feedstock, actively composting material, or finished compost is located onsite.

39. The owner or operator shall maintain records required by this Order of Approval for five years and make them available to Puget Sound Clean Air Agency personnel upon request.

40. For the purposes of this Order of Approval, “new” refers to the operations and equipment covered by this Order of Approval and added to the facility after February 2021 and “existing” refers to the operations and equipment temporarily approved by OA 10494 and permanently approved with this Order of Approval.

41. Upon issuance of this Order of Approval, this Order supersedes and cancels Order of Approval No. 10494, dated April 1, 2014, and cancels NOC application 11053 submitted November 12, 2015.

Order of Approval for NC No. 11753

APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.

Carole Cenci	John Dawson
Reviewing Engineer	Engineering Manager

From:	Bruce Kitting
To:	Public Comment
Subject:	Complaint about Lenz
Date:	Sunday, March 28, 2021 2:35:07 PM

Dear Ms. Cenci,

I heard that Puget Sound has issued an order of approval 11753 to expand Lenz composting.
I have asthma and can't breathe well when Lenz is composting on various times of the year.
I have to stay indoors all-day. The ammonia is hazardous to my health!

Many in our community are asking PSCA to hear us and stop this from happening!
We want to preserve the exciting air that we have. Isn't there already enough bad fumes from other sources
we have to contend with on a daily basis let alone 75,000 tons more from Lenz ?

Thank you,
Bruce Kitting
7229 286th PL NW
Stanwood, WA 98292

From: Carole Cenci
To: Public Comment
Subject: FW: Comments on Lenz for you. Thank you.
Date: Tuesday, March 30, 2021 8:48:53 AM

From: Melissa McAfee <MelissaM@pscleanair.gov>
Sent: Monday, March 29, 2021 7:54 AM
To: Carole Cenci <CaroleC@pscleanair.gov>
Cc: Christina Bachiller <ChristinaB@pscleanair.gov>
Subject: Comments on Lenz for you. Thank you.

Case # Case Type Received Date Incident Time Complainant Zip Inspector Location Street Location City Codes Names Complainant Name Has Evaluation? Responsible Party Home Phone Comments
2021500409 Odor 3/28/2021 1415 98292 MM - Melissa McAfee 5210 WA-532 Stanwood Bruce Kitting Unchecked (408) 220-4672 I heard that Puget Sound has issued an order of approval 11753 to expand Lenz composting. I have asthma and can't breathe well when Lenz is composting on various times of the year. I have to stay indoors all-day. The ammonia is hazardous to my health
2021500408 Odor 3/28/2021 1343 98292 MM - Melissa McAfee Lenz Enterprises Inc 5210 SR 532 Stanwood Peggy Kitting Unchecked Lenz (408) 220-4673 "Application No. 11753
I'm against Lenz Enterprises, Inc. expanding this commercial composting facility! Isn't it already enough I can barely breathe on the days they are composting? Please don't increase emissions of volatile hazardous air pollutant"

From: Carole Cenci
To: Public Comment
Subject: FW: Proposed permit for Lenz Ent. Stanwood
Date: Tuesday, March 30, 2021 8:49:38 AM

From: scollins@collinswoodfarm.com <scollins@collinswoodfarm.com>
Sent: Saturday, March 27, 2021 10:22 AM
To: Carole Cenci <CaroleC@pscleanair.gov>
Subject: Proposed permit for Lenz Ent. Stanwood

Carole,

Our home and property is about a mile north of the Lenz Ent. site. I know that in this neighborhood where we have lived for 35 years we accept living in the country with it's accompanying farm smells. We are not fond of the smell of rotting compost from their site and comment between each other on the pungency of the odor (which can literally drive you indoors at times.) However, the idea that they would double the amount of material they are composting is definitely extremely unpleasant to consider.

I have no ill will toward the company, have used their products and respect they are long time members of our community. It is just hard to put Clean Air and Lenz compost in the same sentence with the amount of product they have now. Please, please, please do not approve this permit.

Thank you for the opportunity to voice our concerns,

Sally Collins
27311 56th Ave NW

360 629 3292

From: Tamara Mattson
To: Public Comment
Subject: Lenz Air Pollution
Date: Thursday, March 25, 2021 8:37:13 PM

Dear Carole, I would like to voice my complaint against the Lenz facility operation. I understand they're trying to double their production. I have been a resident of Stanwood for seven years. The air quality in the area has declined for the last several years due to the increased operation of odors emanating from the Lenz facility. I am an avid walker and biker and I covet fresh air. The air quality in Stanwood between the two Lenz facilities North and South is becoming horrendous. My breathing is affected by the putrifying ammonia stench. I can no longer assume good air quality without first opening up my front door to give the Lenz air stench sniff test. Sometimes it is so bad it comes through the vents in our home. I no longer feel free to open my doors and windows and feel like a prisoner in my own home when the stench has parked itself in my neighborhood.

When I bike or walk I find if it's not at my house at the lower elevations it has ascended to the near but higher neighboring hills. Sometimes I can't get away from it. My husband and I are compelled to drive to Camano to walk and get fresh air since it is no longer the norm to find fresh air in Stanwood.

Often in the middle of the night and even during early morning hours I have been rudely awakened from sleep by the Lenz stench -my husband and I sleep with our window open: the stench comes wafting into our room and I can barely breath without accompanying nausea and mental distress. Needing the window open for cool air flow and better respiration I suffer to close the window to keep the stench out.

The stench from Lenz is an embarrassment to the community and it has the potential to be detrimental to the economic welfare of Stanwood . I often think I will have to move out of the area to get away from Lenz contamination if it continues at this accelerated rate. I can handle the smell of a manure spray on crops twice a year but Lenz having increased its production the last few years is filling Stanwood with almost 24/7 365 days a year of overtly strong unhealthy stench wrenching odor.

The Lenz stench is not welcoming to those seeking residency in this lovely community.
If this stench continues and is even doubled people may think twice about living here let alone wanting to visit. It reminds me of the Aroma of Tacoma. We don't want Stanwood to be a micro version of Tacomas Aroma which is so notorious that it is listed in Wikipedia!

Until Lenz can prove he can produce better quality air with less stench -contained and confined to his property, with the amount he is producing now - he should not be allowed to double his production! I am suffering in misery and have even shed tears over the depressing and oppressive stench these last years robbing me of the healthy fresh air we are all entitled to.

I do find it interesting that during the past two weeks before I learned of this announcement the air quality has much improved and my stress has subsided as the Lenz stench has lessened. There is no doubt in my mind they are trying to keep a low profile and scoot under the radar nose of citizens until they get their application for permit approved. I would expect the stench to come back full bore once the decision has been made for or against. I say

No,No,No! Please do not grant their petition. Thank you for allowing me to express my opinion, sincerely Tamara Mattson.

From:	Ken Kraintz
To:	Carole Cenci
Subject:	Lenz composting permit
Date:	Friday, April 23, 2021 4:51:06 PM

Dear Carole,

This email is concerning the expanding of the Lenz composting permit that is currently being reviewed. We have lived in our home at 25707 38th Ave NW Stanwood for 15 years. During that time we have seen several changes in the surrounding area, some good and some questionable.

The changes we have seen in the Lenz operation over the last 15 years have been a concern for our entire area. The conversion from a sand and gravel company to a composting company has brought a great deal of negative feelings from everyone who has to endure the toxic smell and continual grinding noise of the machinery associated with this operation.

The article in the Everett Herald mentioned a smell emanating from the Lenz operation once or twice a month. I can assure you it is many more times per month than that. In our area we experience equine and bovine odors as a natural part of living in the country. In fact our mortgage states this is an accepted part of rural living. Never did we expect to be exposed to the horrible smell coming from a composting company that was constructed several years after we moved into our home.

We adamantly oppose any further expansion of the composting operation that has been proposed. In fact, we would be in favor of a complete cessation of the composting operation which is going on at this time.

Thank you for your attention to this matter and I would appreciate any future public information your office will release.

Sincerely,

Ken Kraintz
425-293-2456
Kenneth.kraintz@gmail.com

From: Daisy
To: Carole Cenci
Subject: Lenz Enterprises expansion plan
Date: Monday, April 26, 2021 2:09:21 PM

We are the owners of the home directly across Hwy 532 from Lenz. The following is a list of negative impacts we endure already, before the planned expansion.
Odor - strong unhealthy smells; not farm type
Rats/rodents/flies/unusual bugs have increased
Air quality - very small particulates settle on vehicles and garden plants. Powder consistency - breathable.
Noise- all hours. Loud frequent truck traffic. Can no longer carry on conversation in our back yard.
Water quality - there is a noticeable difference in the taste of our ground water
Pesticides - see trucks going in there
Allergies - never had them until recently
Light pollution - we used to watch the stars and enjoy quiet sunsets. Not now.
Home value impacted because of them. They wanted to buy us out, but never said why.

This is Stanwood. One of the few rural communities left for us to enjoy natural beauty and a quiet lifestyle. Please don't let them completely ruin us.

Very truly,

Daisy & Ronnie Olivier

From: Gloria Drury
To: Carole Cenci
Subject: Lenz Enterprises expansion
Date: Tuesday, April 27, 2021 3:19:59 PM

We had previously complained directly to Lenz about the stench smell and are concerned about it only getting worse. Our young granddaughters are already plugging their noses & running into the house upon getting out of their vehicle when they come to visit. We cannot imagine what it will be like once they expand.

Bob & Gloria Drury
27217 56th Ave NW
Stanwood, WA 98292
360-629-4352

From:	Karen Bjerkness
To:	Public Comment
Subject:	Lenz odor
Date:	Wednesday, March 24, 2021 11:48:55 AM

I have lived in Stanwood my whole life and am concerned it has become a town that stinks! I've smelled Lenz for years and have always heard complaints from friends and neighbors in the area. Does double the operation mean double the odor? I live in a farming community so I'm used to the smell of manure but this is different.....very offensive.
Karen Bjerkness

Sent from my iPhone

From:	Paul Mazzio
To:	Public Comment
Subject:	No to Lenz
Date:	Saturday, March 27, 2021 11:13:45 AM

Hi I am writing to say::

PLEASE DO NIT LET LENZ EXPAND. I open my front door or garage and the stench of the odor now is suffocating and breathing it in is worst. Allowing them to expand would be deteriorating to our community in air quality and in health. I know we are all going to die one day but we can prevent this from happening if our quality of air stays better without more chemicals being released in our community.

Please denied their request.

Barbara Mazzio
28128 73rd AV NW
Stanwood, WA 98292

425-320-6133

From:	Peggy Kitting
To:	Public Comment
Subject:	Order No. 11753
Date:	Sunday, March 28, 2021 2:15:12 PM

Hello Carole Cenci,

RE: No. 11753

My family has lived in the Stanwood area for over 6 years. On occasion I would smell a horrible stench in the air all day. It was so bad I had to stay indoors. I thought it was nearby farms plowing cow manure, but later found it was ammonia. I could distinctly smell ammonia.

I heard that the Puget Sound Clean Air Agency has proposed a permit and public hearing for Lenz Enterprises, Inc. to **expand** their commercial composting facility from 75,000 to 150,000 tons per year of feedstock.

The proposed expansion of the facility will increase emissions of **volatile** organic compounds by up to 33.8 tons per year, ammonia by 17.2 tons per year, and **hazardous** air pollutants by 8.0 tons per year.

Isn't it enough that Lenz already smells up our air right now? Why would you want to increase more hazardous air pollutants into the air that we breathe? I believe that clean air is healthy air and healthy air is vital to all of our health and well-being!

Why would Puget Sound Clean Air Agency approve a permit to expand? It just does not make any sense.

Please do not do this to us!

Best regards,
Peggy Kitting
7229 286th PL NW
Stanwood, WA 98292
408 220-4673

From: Sid Roberts
To: Public Comment
Subject: Order No. 11753
Date: Sunday, April 11, 2021 9:14:58 AM

Letter of concern over expansion of Lenz Enterprises.

Our family lived in East Stanwood from 1996 until 2005. My wife was actually raised in Stanwood and went to schools here. So we were accustomed to the smells of a farming community and accepted those fragrances as occasional inconveniences of living in a rural community. We then moved away for 12 years and then moved back to Stanwood in 2017. Immediately, upon moving back, we started to notice a putrid odor that we weren't able to identify. This was new and distinctive. Typically we smelled it when the wind was from the SE and when the wind speed was under 5 MPH. This odor often was sometimes so strong that we didn't want to go outside. We live NW of Lenz Enterprises by about a mile.

In time, after talking to other Stanwood and local Snohomish county residents, and after visiting the Lenz site for retail services, we began to understand this new smell for us was indeed coming from the composting at Lenz. You can often smell the odor on SR 532 when you drive by the site, even with your windows up. So I was shocked to read an article in The Herald in 2019 about the Lenz expansion stating that they had virtually no negative comments from residents.

I was then contacted by a neighbor who had called Lenz about the odor. My neighbor had actually scheduled a meeting at their home with a Lenz representative and invited me and another neighbor to meet with them. The Lenz representative that came to meet with us was the Lenz scientific representative, Mr. Edward Wheeler. Mr. Wheeler was cordial and visited with us about their process. He gave a bit of a presentation and had documentation and paperwork regarding wind speed and such. When asked for a copy of his visual aid, he wouldn't share with us. He was friendly at first and then became more defensive with us, especially later after I emailed the PSCAA. In time, I began to email PSCAA and copy Mr. Wheeler. One rather poignant moment is when Wheeler stated that we couldn't be sure the odor was coming from Lenz since we weren't professionally trained, as he was, to distinguish the nuances of odor.

In fairness to Lenz Enterprises, they are a community partner and provide jobs and the like. Wheeler is an employee and it seems he was just trying to do his job. And, it seems, that the odor lately has been a bit less of an issue. However, I'm very concerned and skeptical that an expansion will cause that putrid odor to become more pronounced. I'm also aware that there is a possibility that the applicant is being especially careful while this application is pending. I'm concerned that after an expansion is approved, it would be much harder to regulate.

I'm a real estate broker by trade and I can speak with a level of confidence that pervasive issues such as odors can cause a diminution of real estate values. They also are intrusive to quality of life and as some have have said, mental well being.

I have been told, and have seen documentation, that argues that the original expansion of Lenz for composting was a bit of a county oversight in terms of the conditional use permit. The county takes the position that it was an allowable use even though the underlying zoning is residential. Ok, I understand that isn't related to your purview. **However, as the air quality**

regulator, you are our protector in terms of air quality issues. PSCAA exists, in part, to insure our air is clean. The question is, does Lenz Enterprises have the right to allow smell to drift off their site and enter our property. I think not. That does happen now and I'm concerned it will get worse if they are allowed to expand.

Please have the courage to step up and regulate this potential nightmare for residents of Stanwood and unincorporated Snohomish County. We are powerless to do anything; but you are the state regulator. Please do your job. That is all I ask. We will live with your decision. Literally.

Sincerely,

Sid Roberts
28001 84th Dr. NW
Stanwood, WA 98292

From: will.steitle
To: Carole Carol
Subject: Slashing methane emissions must play larger role in fighting climate crisis: UN
Date: Monday, April 26, 2021 10:49:04 AM

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https://nam10.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.alternet.org%2F2021%2F04%2Fmethane-climate-change%2F&data=04%7C01%7Carolec%40pscleanair.gov%7C62df9b1ba2074d3b3585d08d908d97a66%7C27a5261fedf247df9c1d49fbbb3733bb6%7C1%7C0%7C637550561441058646%7CUnknown%7CTWFpbGZsb3dBoyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000&sdata=RU9fZ4dIUF%2FQdlwJTIcLnu7%2FASoR%2B9ZhcYu9ESWGrxg%3D&reserved=0

From:	will varley
To:	Carole Cenci
Subject:	Stanwood Compost
Date:	Monday, April 26, 2021 10:42:52 AM

Howdy Carole, we live about one mile by the way the wind blows. On many days I can smell the methane and rotting compost. With all the new housing that Stanwood is putting in it will be impacting more and more folks. I am against making the compost site bigger, in fact I'd like to see it smaller.
I sent you an article about methane from the UN, I hope you got it.
Thanks , Will Varley, 8214 Henning Dr 98292, 3602024906

Lenz Public Hearing - Just Comments

Transcribed by Carole

Peggy Kitting @8:34 minutes in

PK: OK. Can you hear me?

PK: OK. Well I'm really concerned about Lenz doubling the size of their composting operation. I mean 75,000 tons extra is enough. And um, it already has an adverse impact on the air that we're breathing because the odor emissions is already affecting us now. And I'm just asking that you would please consider about the odor that is expanding in our neighborhood. It's already worse. Um. I did read about how um Puget Clean Air Agency is going to prevent the smells from reaching us. But um, and and the fact that um Lenz is not supposed to have any detectable odor that's allowed um at or beyond the facility boundary. But yet we're smelling odors um. And um you can have a daily inspection and parole, patrol or you can have extra people come on board to employ. But um the perimeter um, but that won't prevent the citizens from smelling the odor coming into our neighborhoods. I mean we're talking about um increased emissions of volatile organic compound of up to 33.8 tons per year. Ah, we already smell ammonia in the air and you're going to be adding 17.2 tons and we're talking about hazardous air pollutants of 8.0 tons per year. That's a of very much concern for my husband who also has asthma.

Ronny Oliviet & Daisy Cooper @ 11:13 minutes in

RO: Hello, how're you doing? My name's Ronny Oliviet. I live directly across the street, 532. I'm the big blue house that looks directly down at Lenz. An um this…we've been dealing with this for years and years. It just gets worse and worse. Not only it's just the odors, but headaches that come along with it. Um my friends that have allergies that come over, they can't stay. We can't work in our garden. There's fallout on our cars from stuff coming across the street and falling on our cars. It only takes one day and our cars are completely filled with this bark-ish um shelled (?) really fine stuff. We had to go purchase a bunch of uh, these expensive air cleaners to go in the house because in some mornings we wake up and it's so terrible in the house that we can't stand it. So we run our air filters at..to try to keep it from going in there. And um, if I was to take 20 steps I could show ya we are directly across the street from Lenz. Um I..I wrote down a whole bunch. It's not just the odors, it's the rats, the rodents that have appeared in the last few. When I moved here um they said that was strictly a staging area for when they were rebuilding the road. That was in '08. And since then it's just been getting bigger and bigger and bigger. When they make bark or whatever they do over there, it smells terrible. And it smells like garbage. And my…this is all I have for my investment for my life. And I have, we have, 7 grandkids that don't like to come over because it stinks. Um, you know, I don't know what to…The air quality is terrible. The ammonia you can smell it. If anybody doesn't…if anybody…you're welcome to come over to my house and sit here for a few minutes and tell me if you get a headache. Um, I'm pretty sure you will. You know, it's trucks in and out, all hours of the night. They say they're only open a certain amount of hours, but they're in and out all night long whether it's chemical trucks that come in and out, they're cleaning things, or whatever it is, they're in. Our our…garden even. When we had our garden last year we had

traces of filt, silt, all over our potatoes and things. And we don't have – there's only one way they could possibly be coming and that's from Lenz across the street, across 532. Um.

DC: We have, we also have, the ammonia issue is a huge deal because it's not something that you just smell. But ammonia toxicity is something that's taken a hammering on your liver. I don't really feel comfortable having any small children over because their lower to the ground. If you've got any studies on what ammonia does to your liver, etc., it's toxic. It's not good at all. And with regards to the fines that land on our car, I mean they're finer than baby powder. You know so that's something that you can breathe. Whatever it is and we don't know, cuz we can't identify it. We have shown pictures, what's going on over there that's causing this on our vehicles. Um, it's a real concern, it's a real health concern. This is not something that's small. This is an unseen toxic event that they're creating. Why do we need Seattle's garbage down here? Can they not process it at a Seattle plant? That's my recommendation. Don't destroy Stanwood.

RO: People are gonna drive through here and they're gonna smell what we smell every single day. And they're gonna go "oh we're in Stanwood"

DC: It just isn't right. It's not at all right. For what reason? Is it to enhance this community? Is it something that is making this area better? I don't think so. I think it has more to do with uh um, somebody making some big money. That's not being a good neighbor.

RO: Big money, kinda fat cow. We've reached out to them and they no comments for us. They don't try to work with us at all. They said that they would wash down the pavement every once in a while. They started doing that for a couple days and it just..it ended. Um they put up so many lights out there that we used to be able to go out on our deck and watch the stars from our deck. And now we can't because there's so much houses over there. I don't know why they're 24/7 have the big bright lights out there. Light pollution is another issue. You know we..we moved to Stanwood to be out in the country ya know.

DC: The noise pollution, can't have a conversation in your backyard anymore.

RO: The jake braking all hours of the night. Starting at 4:00 in the morning..bom bom bom bom, coming down that hill. And then when they take off in the morning, it's going through all the gears going up the hill. I mean it's just more and more, all day long, all night long. It's taken a toll on our um..for one, on our financial situation because we want our house to be worth something.

DC: and our health. Can't buy that back.

RO: So we found out about this 3 days ago. Or else we would have been reporting this a long time ago. Just didn't know who to go to. This has been an ongoing problem since 2008, since I moved here. I bought this house in '08/'09 and it was supposed to be a staging area over there. And since then it's just grown bigger and bigger and gotten stinkier and stinkier. And I don't know, it growing double the size it is right now. It would force us outta here because there's no way that we could stay here. I know it's just us. And you think it's just one person, couple, but we have 7 grandkids. We have, you know, between us, we have our children. They're going to have children. This is the place we wanted them to come.

Jolene Upshaw @18:45 minutes in

JU: Can you hear me now? Um I just wanted to kinda follow up on his comment, on their comments. Um, we used to live in Marysville right at the south end of Marysville. So we used to have the flats. When they used to gas off and you couldn't enjoy your backyard. And that went on for a long time. We actually moved from there and moved to Stanwood. Um, which it was fine. And then, you know, then you start going up the hill and you, um, you know your stomach kinda hurts. Kinda takes you a minute, takes your breath away a little bit. Usually when the cloud cover is low it's really strong. We don't live that..we don't live directly across from them but we don't live that far. We are in the city limits. When I contacted the city, they said they're out of the city limits and the city had nothing to do with it. So I had made a comment to Snohomish County and gave a little note about it and had someone look into it. I don't know how far it got, but I am concerned that, you know, if we do invest in our property. We have a very nice yard. But yet, if you can't go out and enjoy it, what is the purpose of it. And you know I'm not here to tell someone they can't make money and stuff. But at the same time, like they said, be a good neighbor. As long as, ya know, it's one thing, I hope, you know, you stated in the comments that um, you know, there's gonna be, you know watching it and filters and all that stuff. But unless you live here everyday and you're smellin' it, you know, I don't know at some point is it just gonna just fall on deaf ears, you know. Um, I guess that's all I wanted to say about it. It's just, it is a problem. There's times you open up your window and you go "oh, there's Lenz today". That I can smell it already. And it's 4 – you know I get up at 3:00 in the morning. Like oh, I already smell it this early in the day. Um, so anyways, that's my only point. Just wanna make sure that it's really being looked at and we have a good neighborhood, a good life style here. Thanks.

Sven Brandt Erickson @21:35

SBE: I'll keep my comments short as I'm going to submit written comments. My name is Sven Brandt Erickson. I represent uh some residents of Camano Island who asked me to assist them and represent them in submitting comments on this application. Ahh, I'm gonna focus on one issue which is, uh, the SEPA review for this project. Uh Puget Sound Clean Air has proposed a Determination of Nonsignificance for the project. And, um, that should be withdrawn and instead the Agency should make a Determination of Significance and require preparation of an Environmental Impact Statement. And this is due not only to the odor issues that I heard discussed in, uh, comments. Also a fundamental issue is to the baseline of analysis. This project, this facility is operating under a temporary approval. That was issued, uh, after a prior expansion that was made without a permit. Uh, and the, uh, increase of the size of the facility from its permanently permitted capacity of 30,000 tons, uh, has never undergone SEPA review. Also, um, I want to hit, in particular, the issue of whether or not stormwater is gonna adequately be controlled from this facility. In the current operation there is stormwater, uh, there is waste being stored in areas that has access to the storm drains for the facility. Uh, and that, the water from that area, goes to the, uh, holding pond, the infiltration pond for the mine. Which is above a steep slope and basically feeds, uh, seeps that lead to waterways that lead out to, uh, the bay. And this is, as additional material is put on this site, that increases the potential for contamination. Which is of, should be of concern for the waterbody. There are a variety of other issues that I'll address in written comments. Uh,

but there are a funda, there are a number of issues in this facility that do deserve further evaluation and a more detailed SEPA analysis. That's all I have for written comments – er -- for oral comments.

Peggy Kitting @ 28:43 minutes in

PK: Thank you for taking me again and listening. I just wanted to make this a party of the record because it was brought to my attention that Lenz might be processing more than 75,000 tons. Um, and I know that Mr. Dawson said that we, they, would not be answering any questions, but it definitely needs to be looked in and explained if this part of the permit process from the Puget Sound Clean Air Agency. Um, it was brought to my attention that they may have exceeded tonnage limits and under-report to the Department of Ecology. And there were tables that were shown that may have, um, Lenz may have taken 16295 tons in 2020 and 89,088 in 2019. That was showing on public records. If this is true and they were only supposed to be taking 75,000 then what is to make us believe that if you increased it another 75,000 that they will not be, uh, not logging it appropriately. Um, so I would really like to have those questions answered. I know that it was brought up by Cedar Grove Composting. And I know that Mr. Steve Van Slyke is on here right now and I just would like to know if anything has come up with that.

Betsy Wheelock

From: Melissa McAfee
Sent: Friday, April 23, 2021 1:25 PM
To: Carole Cenci
Cc: Rick Hess
Subject: FW: Complaint In Progress | Odor | 04/23/2021 09:48 AM | Reg 28983 | 5210 WA-532, Stanwood 98292

From: Inspection Dept <Inspection@pscleanair.org>
Sent: Friday, April 23, 2021 10:03 AM
To: Melissa McAfee <MelissaM@pscleanair.gov>
Subject: Complaint In Progress | Odor | 04/23/2021 09:48 AM | Reg 28983 | 5210 WA-532, Stanwood 98292

Complaint Details:
Case#: 2021500529
Received Date & Time: 04/23/2021 10:03 AM

Incident Date & Time: 04/23/2021 09:48 AM
Is currently in progress? Yes
Case Type: Odor
Responsible Party: Lenz Enterprises Inc.

Reg: 28983
Lenz Enterprises Inc
5210 SR 532
Stanwood, WA 98292
Jason Lenz, Owner
(425) 508-3197
Jason@lenz-enterprises.com

Standard Location:
5210 WA-532
Stanwood, WA 98292

Submittal Location:
5210 SR 532
stanwood, WA 98292

Description: I have been working in my yard and the smell if bad. It bothers my breathing. This needs to stop, its bad enough that now we are at Level 2 again to stay home, but it is bad to breath that crap.

Complainant Information:
Eric Pilkington
7102 278th St. NW
stanwood, WA 98292
Daytime Phone: (360) 572-4568
E-mail: ergepilk2006@aol.com

Betsy Wheelock

From: melissam@pscleanair.gov
Sent: Monday, April 19, 2021 9:45 AM
To: Carole Cenci
Subject: Complaint In Progress | Odor | 04/05/2021 0843 | | 5210 WA-532, Stanwood, 98292

Complaint Details
Case#: 2021500441
Received Date & Time: 04/05/2021 0947
Incident Date & Time: 04/05/2021 0843
Entered Date & Time: 04/05/2021 0947
Currently in progress? Yes
Case Type: Odor

Standard Location:
5210 WA-532
Stanwood, WA 98292

Description: There is a very bad oder, that smells like shi! and it was not pleasent at all. I smelled it earlier, but didn't know what to do about it till I talked to my friend and she sent me this site.

Complainant Information:
Georgia Pilkington
7102 278th St. NW
Stanwood, WA 98292
(253) 905-5817
ergepilk2006@aol.com

Betsy Wheelock

From: Carole Cenci
Sent: Tuesday, March 30, 2021 3:08 PM
To: Public Comment
Subject: FW: Complaint | Odor | 03/26/2021 09:00 AM | 27903, 69th, Stanwood 98292

From: Melissa McAfee <MelissaM@pscleanair.gov>
Sent: Tuesday, March 30, 2021 3:06 PM
To: Carole Cenci <CaroleC@pscleanair.gov>
Subject: FW: Complaint | Odor | 03/26/2021 09:00 AM | 27903, 69th, Stanwood 98292

FYI.

From: Inspection Dept <Inspection@pscleanair.org>
Sent: Tuesday, March 30, 2021 2:56 PM
To: Melissa McAfee <MelissaM@pscleanair.gov>
Subject: Complaint | Odor | 03/26/2021 09:00 AM | 27903, 69th, Stanwood 98292

Complaint Details:
Case#: 2021500418
Received Date & Time: 03/30/2021 02:55 PM

Incident Date & Time: 03/26/2021 09:00 AM
Is currently in progress? No
Case Type: Odor
Responsible Party: Lenz Enterprises

Standard Location:
27903, 69th
Stanwood, WA 98292

Submittal Location:
27903, 69th
Stanwood, WA 98292

Description: Stench odor coming from Lenz facility. Unhealthy odor smells like ammonia not natural farm manure. Didn't know I could file a complaint. I would have started years ago. They are polluting the air I breath. No permit should be issued!

Complainant Information:
Tamara Mattson
27903, 69th
Stanwood, WA 98292
Daytime Phone: (425) 319-7802
E-mail: tmmattson@gmail.com

Betsy Wheelock

From: Melissa McAfee
Sent: Monday, April 19, 2021 7:51 AM
To: Carole Cenci
Subject: FW: Complaint | Odor | 04/02/2021 08:13 AM | 27903, 69th ave NW, Stanwood 98292

From: Inspection Dept <Inspection@pscleanair.org>
Sent: Monday, April 19, 2021 6:18 AM
To: Melissa McAfee <MelissaM@pscleanair.gov>
Subject: Complaint | Odor | 04/02/2021 08:13 AM | 27903, 69th ave NW, Stanwood 98292

Complaint Details:
Case#: 2021500505
Received Date & Time: 04/19/2021 06:18 AM

Incident Date & Time: 04/02/2021 08:13 AM
Is currently in progress? No
Case Type: Odor
Responsible Party: Lenz

Standard Location:
27903, 69th ave NW
Stanwood, WA 98292

Submittal Location:
27903, 69th ave NW
Stanwood, WA 98292

Description: Lenz composting odor in my neighborhood

Complainant Information:
Tamara Mattson
27903, 69th ave Nw
Stanwood, WA 98292
Daytime Phone: (425) 319-7802
E-mail: tmmattson@gmail.com

Betsy Wheelock

From: Melissa McAfee
Sent: Thursday, April 8, 2021 7:12 AM
To: Carole Cenci
Subject: FW: Complaint | Odor | 04/02/2021 08:15 AM | 27903 69th AVE NW, Stanwood 98292

From: Inspection Dept <Inspection@pscleanair.org>
Sent: Wednesday, April 7, 2021 9:41 AM
To: Melissa McAfee <MelissaM@pscleanair.gov>
Subject: Complaint | Odor | 04/02/2021 08:15 AM | 27903 69th AVE NW, Stanwood 98292

Complaint Details:
Case#: 2021500454
Received Date & Time: 04/07/2021 09:41 AM

Incident Date & Time: 04/02/2021 08:15 AM
Is currently in progress? No
Case Type: Odor
Responsible Party: Lenz Enterprises

Standard Location:
27903 69th AVE NW
Stanwood, WA 98292

Submittal Location:
27903 69th AVE NW
Stanwood, WA 98292

Description: Pungent chemical smell (ammonia, pollutants) in the air. Very disturbing as this happens very frequently at our home over the last 5 years. And by the way the odor is the same odor as we smell when we drive by Lenz Enterprises on Hwy 532 in Stanwood

Complainant Information:
Dan Mattson
27903 69th AVE NW
Stanwood, WA 98292
Daytime Phone: (425) 319-7800
E-mail: thehomepro@me.com

Betsy Wheelock

From: Melissa McAfee
Sent: Monday, April 19, 2021 7:52 AM
To: Carole Cenci
Subject: FW: Complaint | Odor | 04/19/2021 06:18 AM | 27903 69th Ave NW, Stanwood 98292

From: Inspection Dept <Inspection@pscleanair.org>
Sent: Monday, April 19, 2021 6:24 AM
To: Melissa McAfee <MelissaM@pscleanair.gov>
Subject: Complaint | Odor | 04/19/2021 06:18 AM | 27903 69th Ave NW, Stanwood 98292

Complaint Details:
Case#: 2021500506
Received Date & Time: 04/19/2021 06:24 AM

Incident Date & Time: 04/19/2021 06:18 AM
Is currently in progress? No
Case Type: Odor
Responsible Party: Lenz

Standard Location:
27903 69th Ave NW
Stanwood, WA 98292

Submittal Location:
27903, 69th
Stanwood, WA 98292

Description: I just want to say the air has never been so good in Stanwood as it has this month since Lenz has slowed down or stopped production. It has been a beautiful spring of floral scents. I am grateful to have a reduced Lenz odor month. No permit!

Complainant Information:
Tamara Mattson
27903, 69th Nw
Stanwood, WA 98292
Daytime Phone: (425) 319-7802
E-mail: tmmattson@gmail.com

Betsy Wheelock

From: Melissa McAfee
Sent: Monday, April 5, 2021 9:22 AM
To: Carole Cenci
Subject: FW: Complaint In Progress | Odor | 04/05/2021 08:50 AM | 7229 286th Pl NW, Stanwood 98292

From: Inspection Dept <Inspection@pscleanair.org>
Sent: Monday, April 5, 2021 8:57 AM
To: Melissa McAfee <MelissaM@pscleanair.gov>
Subject: Complaint In Progress | Odor | 04/05/2021 08:50 AM | 7229 286th Pl NW, Stanwood 98292

Complaint Details:
Case#: 2021500438
Received Date & Time: 04/05/2021 08:57 AM

Incident Date & Time: 04/05/2021 08:50 AM
Is currently in progress? Yes
Case Type: Odor
Responsible Party: Lenz Enterprises, Inc.

Standard Location:
7229 286th Pl NW
Stanwood, WA 98292

Submittal Location:
7229 286TH PL NW
STANWOOD, WA 98292

Description: Order #11753 Today I smell Lenz odors in our air! I can't imagine if Lenz expands 75000 tons more! It smells so bad I will not be able to leave my house today! My husband has asthma! My family is against Lenz expansion.

Complainant Information:
Peggy Kitting
7229 286TH PL NW
STANWOOD, WA 98292
Daytime Phone: (408) 220-4673
E-mail: peggypooh321@yahoo.com

Betsy Wheelock

From: Melissa McAfee
Sent: Monday, April 5, 2021 1:19 PM
To: Carole Cenci
Subject: FW: Complaint In Progress | Odor | 04/05/2021 09:49 AM | Reg 28983 | 5210 WA-532, Stanwood 98292

From: Inspection Dept <Inspection@pscleanair.org>
Sent: Monday, April 5, 2021 9:54 AM
To: Melissa McAfee <MelissaM@pscleanair.gov>
Subject: Complaint In Progress | Odor | 04/05/2021 09:49 AM | Reg 28983 | 5210 WA-532, Stanwood 98292

Complaint Details:
Case#: 2021500442
Received Date & Time: 04/05/2021 09:54 AM

Incident Date & Time: 04/05/2021 09:49 AM
Is currently in progress? Yes
Case Type: Odor
Responsible Party: Lenz Enterprises Inc.

Reg: 28983
Lenz Enterprises Inc
5210 SR 532
Stanwood, WA 98292
Jason Lenz, Owner
(425) 508-3197
Jason@lenz-enterprises.com

Standard Location:
5210 WA-532
Stanwood, WA 98292

Submittal Location:
5210 SR 532
Stanwood, WA 98292

Description: this oder is awful and it sucks to smell this early in the morning. I am against Lenz expanding their compost because to and hazardous air pollutants in the air really bad! I can't go out an work in my garden because the smell is really really bad.

Complainant Information:
Eric Pilkington
7102 278th St. NW
Stanwood, WA 98292
Daytime Phone: (360) 929-3309
E-mail: ergepilk2006@aol.com

Betsy Wheelock

From: Melissa McAfee
Sent: Friday, April 23, 2021 1:25 PM
To: Carole Cenci
Cc: Rick Hess
Subject: FW: Complaint In Progress | Odor | 04/23/2021 09:36 AM | Reg 28983 | 5210 WA-532, Stanwood 98292

From: Inspection Dept <Inspection@pscleanair.org>
Sent: Friday, April 23, 2021 10:00 AM
To: Melissa McAfee <MelissaM@pscleanair.gov>
Subject: Complaint In Progress | Odor | 04/23/2021 09:36 AM | Reg 28983 | 5210 WA-532, Stanwood 98292

Complaint Details:
Case#: 2021500528
Received Date & Time: 04/23/2021 10:00 AM

Incident Date & Time: 04/23/2021 09:36 AM
Is currently in progress? Yes
Case Type: Odor
Responsible Party: Lenz Enterprises Inc.

Reg: 28983
Lenz Enterprises Inc
5210 SR 532
Stanwood, WA 98292
Jason Lenz, Owner
(425) 508-3197
Jason@lenz-enterprises.com

Standard Location:
5210 WA-532
Stanwood, WA 98292

Submittal Location:
5210 SR 532
Stanwood, WA 98292

Description: The bad smell is around again. I really sucks to be outside working in my garden and have to smell that stuff. I can't stand it, so I have to check to see if the smell has gone before I go work in my garden again. Im not happy that its happening.

Complainant Information:
Georgia Pilkington
7102 278th St. NW
Stanwood, WA 98292

Daytime Phone: (360) 572-4568
E-mail: ergepilk2006@aol.com