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Puget Sound Clean Air Agency

Puget Sound Clean Air Agency

Notice of Construction No. **11911**

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

Registration No. **24934**

Date DEC 0 5 2019

Composting System rated at 228,521 tons per year of pre and post-consumer food waste, yard, clean wood and land clearing wastes; consisting of (4) four - 41,000 ton per year Gore Composting Systems with the first phase of composting reduced from 28 to 21 days; a Tipping Building (with additional 100 ft x 50 ft apron canopy) for receipt, grinding, and mixing of feedstocks with a 24,000 cfm rated biofilter; and a Grinding Building (625 square foot) for grinding and mixing feedstocks to be equipped with a 900 square foot biofilter rated at 2,100 cfm exhaust flow.

OWNER

Cedar Grove Composting, Inc
7343 E Marginal Way S
Seattle, WA 98108

INSTALLATION ADDRESS

Cedar Grove Composting, Inc
3620 36th Pl NE
Everett, WA 98201

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.

2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

3. Facility Wide Inspections - Fugitive Dust
   (a) Cedar Grove Composting shall conduct site-wide inspections of the property and the adjacent streets daily to identify:
      (1) Precautions being taken with respect to material handling operations to minimize fugitive dust; and
      (2) Precautions being taken with respect to vehicle movement and pad/road maintenance operations, to minimize fugitive dust; and
      (3) Precautions being taken with respect to spillage of materials on traffic routes; and
      (4) Prevention and removal of evidence of track out, originating from the facility.

   (b) Cedar Grove Composting shall document the results of each inspection, to include the corrective action taken (along with date and time) in response to observations which are inconsistent with respect to the O&M Plan or Puget Sound Clean Air Agency regulation.
   (c) Cedar Grove Composting shall, as soon as possible, but no later than one calendar day after identification, correct any compliance problems identified during these inspections.

4. Facility Wide Inspections – Odor
   (a) Cedar Grove Composting shall conduct inspections of the property daily to ensure that all tipping building activities and Gore System piles are operating in good working order to minimize the generation or release of odors, and to ensure that the capture and control systems for the tipping building and Gore System piles are operating properly.

   (b) Cedar Grove Composting shall document the results of each inspection, to include the corrective

action taken (along with date and time) in response to potential compliance problems as identified in this condition and in response to operational practices which are inconsistent with respect to the O&M Plan or Puget Sound Clean Air Agency regulations.

(c) Cedar Grove Composting shall, as soon as possible but no later than one calendar day after identification, correct any potential compliance problems identified during these inspections. Such corrective actions shall include (but are not limited to) the repair of Gore Covers, the repair or rebuilding of biofilters, the replacement of missing or improperly placed cover anchors, or the removal of standing water.

5. Tipping Building Feedstock Processing and Initial Compost Placement

(a) With the exception of stumps, brush, clean wood, finished compost, and land clearing debris, all material brought on site as composting feedstock is defined as Compostable Waste Material. All Compostable Waste Material brought on site shall be deposited completely inside the tipping building until processed.

(b) All Compostable Waste Material shall be premixed for composting before leaving the tipping building.

(c) At the end of each workday, all Compostable Waste Material on site shall be stored in the tipping building, and all Actively Composting Material on site shall be stored and covered in the Gore System.

6. Gore Cover Composting System

(a) All Actively Composting Materials shall remain under cover, except during inter-phase movement, for the first 35 days these materials are on-site. For Condition No. 6 of this Order, the term "day" shall mean a calendar day. The first day of any period specified in this Condition No. 6 begins when:

(1) The Actively Composting Material pile building is complete;

(2) The Gove Cover is installed on the pile for operation; and

(3) The oxygen and temperature probes are installed in the pile.

Compliance with this requirement can be demonstrated by computer records of data obtained in the controlling software that demonstrates the temperature probes have been activated and are exhibiting non-ambient temperature data for the pile.

(b) The composting cycle to be used under this Order shall include placements of Actively Composting Material at no less than 21 days in the Gore System Phase I pile, no less than 14 days in the Phase II pile, and no less than 14 days in the Phase III pile, before screening or moving to interim storage before screening and placement in the finished compost pile. Phase I and Phase II will take place under a Gore System Cover under positive aeration using the oxygen and temperature data for operation control as provided by Gore.

(c) The oxygen and temperature monitoring parameters which would indicate that composting is sufficiently complete for both Phase I and Phase II piles shall be established by Cedar Grove Composting, in cooperation with Gore Systems, and identified in the O&M plan for the facility. The O&M plan section on Temperature Parameters and Oxygen Parameters (Section 3.2.1.5) dated September 2019 and on file with Agency defines these parameters which shall be met by Cedar Grove for all piles. O&M plan Section 3.2.1.5 (dated September 2019) may not be modified without prior written approval from the Agency and the Agency response shall not be unreasonably withheld or delayed.

(d) If the oxygen and temperature monitoring data for each Gore System Phase I and Phase II pile indicates that composting is not sufficiently completed, as required in Condition 6(c) of this Order, the pile shall not move to the next phase in the process. If the oxygen and temperature data does not meet the conditions described on Condition No. 6(c) for a pile, the pile must either remain under cover until that data indicates the phase is complete, or be returned to the tipping building and reprocessed to restart

the composting process, or blended into a new Phase I pile (or Phase II pile material into a new Phase II pile).

(e) Oxygen and temperature monitoring data for each Gore System pile shall be recorded and retained for up to 2 years. That data shall be available to Agency personnel upon request.

7. Wood , Other Carbon Amendments, Overs and Finished Compost - Grinding, Reclamation, Screening and Storage

(a) Emissions from the grinding building activities shall be captured just under the peak of the roof, and passed through the associated biofilter.

(b) Cedar Grove Composting shall conduct and document, as required in Condition No. 4 of this Order, the results of daily inspections, to ensure that all grinding building activities and the associated biofiltration system are operating in good working order to minimize the generation or release of odors and fugitive dust.

(c) The grinding building and biofiltration system operations shall be reviewed and audited in accordance with the procedures and schedule specified for the tipping building and biofilter system in Condition No. 11 of this Order.

(d) The doors of the grinding building shall be closed at all times during grinding operations.

(e) The ventilation and biofiltration system shall be in operation whenever any grinding or feedstock handling takes place in the grinding building.

(f) Compostable Waste Material shall be premixed for composting before being brought into the grinding building.

(g) Compostable Waste Material shall not be stored in the grinding building overnight.

(h) Cedar Grove Composting Inc. may grind stumps, brush, finished compost and clean wood in a grinder not installed in the grinding building.

(i) Cedar Grove Composting Inc. shall install and properly operate a fine water mist system on any outdoor wood grinders to control fugitive dust.

(j) Cedar Grove Composting Inc. shall not exceed 10% opacity for any air contaminant for a period or periods aggregating more than 3 minutes in any 1 hour from the outdoor grinders and screening equipment as measured by WDOE Method 9A.

8. Leachate Control and Use: Cedar Grove Composting shall route standing water and water runoff from the tipping building and trenches in 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.

9. Complaints

(a) Cedar Grove Compost shall establish a meteorology station capable of measuring and recording temperature, wind speed, and wind direction.

(b) Cedar Grove Composting shall establish a complaint response program as part of the O&M Plan. The program shall include a complaint phone line, criteria and methods for establishing whether Cedar Grove Composting may be the source of emissions related to the complaint, and a format for communicating results of investigation and advising complainants of Cedar Grove's corrective actions.

(c) Cedar Grove Composting shall record and investigate complaints received regarding air quality as soon as possible, but no later than one working day after receipt.

(d) Cedar Grove Composting shall correct any problems identified by these complaint investigations within 24 hours of identification.

(e) 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.

(f) Records of all complaints received regarding air quality issues shall be maintained for up to 2 years and be made available to Agency personnel upon request.

10. Tipping Building Ventilation Performance and Tests

(a) Emissions from the tipping building activities shall be captured and passed through the biofilter. Compliance with the requirement shall be determined by the observation of no visible emissions from the open face of the tipping building during the release of test smoke completed using procedures specified in the approved test plan identified in Condition No. 10(c) of this Order. Cedar Grove shall have smoke test kits which are consistent with the approved test procedures and have them available at the facility for that purpose. Tests shall be completed as required below, and at any other time as requested by Agency personnel.

(b) Cedar Grove Compost shall complete smoke testing for the tipping building ventilation system to demonstrate compliance with Condition No. 10(a) of this Order once each calendar quarter. The test shall be completed with the building open to the maximum extent possible during tipping building operations. Each quarterly test shall be no less than 45 days since the last test and no more than 135 days since the last test.

(c) A test plan shall be developed and received by the Agency for review and approval 30 days after approval of this Order.

(d) The first test for this requirement shall be completed no later than 30 days following approval of the test plan required above.

(e) The first test for this requirement shall satisfy the requirements of Puget Sound Clean Air Agency Regulation I, Section 3.07 regarding test notification.

(f) Each test completed as required in this Condition shall be recorded in a digital video format to document the results of the test.

(g) Any test which does not demonstrate compliance with Condition No. 10(a) shall be identified in the monthly report identified in Condition No. 14 of this Order. Additionally, the date and scope of corrective action taken, along with the date of the subsequent test demonstrating compliance shall also be identified in the monthly report.

11. Tipping Building & Biofilter Review

(a) Cedar Grove Compost shall have the tipping building and biofilter operations reviewed and audited by an independent third party semi-annually. This review will be completed to document the on-going performance of the tipping building emission capture system and the biofilter operation. The review shall include, but is not limited to:

(1) Operational condition and integrity of the exhaust/capture system

(2) Operational condition and integrity of the biofiltration system

(3) Adequacy and effectiveness of the system maintenance program and practices

(4) Repair history and troubleshooting efforts by owner/operator

(5) Recommendations for continuous improvement of the integrated system operation

(b) Each review shall be no less than 150 calendar days since the last review and no more than 210 calendar days since the last review.

(c) Each semi-annual review report shall be submitted to the Agency within 60 days of the date the date the review was completed.

12. Tipping Building Operational Monitoring:

(a) Cedar Grove shall record for each load delivered to the site the following information:

(1) Load reference (e.g. hauler, vehicle ID, scale transaction reference)

(2) Load characterization (Compostable Waste Material, stumps, brush, clean wood, or land clearing debris)

(3) Load placement (inside tipping building, other identified location)

(4) Date and time of load drop, a confirmation that each load placement was in compliance with Condition No. 5(a) of this Order, and the initials of the Cedar Grove employee that observed it.

(b) In the event a load of Compostable Waste Material is not placed in the tipping building as required in Condition No. 5(a) of this Order, Cedar Grove shall take immediate corrective action to comply with that condition, shall document the corrective action taken, and report it as a deviation as required in Condition No. 14 of this Order.

(c) Cedar Grove shall record hourly observations of the Compostable Waste Material processing in the Tipping Building and outside of the building to determine compliance with Condition No. 5(b) of this Order. Each observation shall include the date, time and initials of the Cedar Grove employee that observed it. The record shall also include any corrective action taken in response to Compostable Waste Material processing operations which are inconsistent with that condition.

13. Recordkeeping Requirements:

(a) All records of observations and supporting documentation which are required by this Order 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 Compostable Waste Material, Actively Composting Material, or finished compost is handled onsite.

(b) All records and documentation which are required by this Order shall be maintained onsite for two years, and made available to Agency representatives upon request.

14. Reporting Requirements: Within 30 days after the end of each calendar month, Cedar Grove Compost shall submit a report that shall include:

(a) The daily volume of all Compostable Waste Material received and the dates the site was not operational, as defined in Condition No. 13(a) of this Order.

(b) Date, time, and description of any action taken to (1) extend the Phase I or Phase II time, (2) return a pile to the tipping building for reprocessing, or (3) blend a pile into new Phase I pile for any Gore System pile as required by Condition No. 6 of this Order. The absence of any action taken to extend the Phase I or Phase II time shall also be reported.

(c) Complaint response program summary, identifying the number of complaints received for the month; and the date, time, and description of any corrective action taken as a result of the investigation from the complaint.

(d) Information regarding tests of the tipping building ventilation system required by Condition 10(g) of this Order.

(e) [RESERVED]

(f) Deviations from the following permit conditions:

(1) Corrective actions required under Condition No. 3(b) of this Order that were not completed within one calendar day after identification

(2) Corrective actions required under Condition No. 4(c) of this Order that were not completed within one calendar day after identification

(3) All Compostable Waste Material deposited completely inside the tipping building (Condition No.

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5(a) of this Order)

(4) All Compostable Waste Material premixed for composting prior to leaving the tipping building for processing (Condition No. 5(b) of this Order)

(5) All Compostable Waste Material stored inside the tipping building and all Actively Composting Material undercover in the Gore System at the end of each workday (Condition No. 5(c) of this Order)

(6) The doors of the Grinding Building were not closed at all times during grinding operations (Condition No. 7(d) of this Order).

Deviation reports shall be submitted on forms provided by the Agency and shall include the date/time the deviation began and ended, description of the deviation event, probable cause for the deviation, and corrective actions or preventative measures taken in response to the deviation. Each report shall be signed by a responsible official of Cedar Grove Composting, certifying that the report is truthful and accurate based on the monitoring and recordkeeping requirement contained in this Order.

15. This Order of Approval No. 11911 shall be effective on March 24, 2020 and on that date, cancels and supersedes Order of Approval No. 11755, dated December 05, 2019.

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.

Alfredo Arroyo
Reviewing Engineer

Carole Cenci, PE
Compliance Manager

3.2.1.5 *Odor Control.*

Odors will be managed by a prevention strategy followed by a collection strategy during delivery, mixing, and processing. The prevention strategy involves ensuring the feedstock meets Health Code requirements regarding its age, then immediately sorting and blending the feedstocks prior to shredding. Priority will be given to quickly shredding and placing of foodwaste within each primary batch. The collection strategy involves performing this activity in the tipping building. The tipping building is equipped with an air collection system in the roof gable. This adds a second level of odor management.

Liquids are managed by a collection system. Free liquids will be captured within the building through a grated sump area.

Housekeeping on the outside of the primary batches will be managed by periodic removal of visible foodwaste at the perimeter of the zones before and after the Gore cover is placed. Additional housekeeping measures insure that any spillage will be cleaned periodically as needed.

The final, and most important, key to odor control at this facility is the proper use of the Gore Cover and its associated automated system for aeration, which optimizes the aerobic decomposition of the feedstock and prevents anaerobic conditions from developing. Cedar Grove's Operation Plan, based on the Gore Operations Manual, establishes a specific protocol designed to optimize process conditions. During the composting process, variables such as oxygen content, porosity, temperature, moisture percent and time are maintained within specific levels to effectively compost the feedstock. The composting process takes place initially in the "heaps" in each of the units of the Gore Cover Compost System™. Each heap is supplied with a "positive aeration system" which forces make-up air through the composting feedstock to supply oxygen. Each heap is also supplied with a GCCS membrane laminate cover. This membrane laminate, when properly secured to the ground, provides multiple functions to include odor reduction, bioaerosol reduction, protection from the environment and process regulation over a 3-week detention period (Phase 1). Batches will be only uncovered and moved after specific timeframes that are designed and proven to take the material to a state of decomposition where odors are no longer generated.

<u>Temperature Parameters</u>

Phase I:

- 131°F for 4 consecutive days
- 105°F for 12 non-consecutive days

If these Phase 1 temperature conditions above and the Oxygen Parameter provisions defined below are met as required by Condition No. 6 of the current Puget Sound Clean Air Agency ("Agency") NOC order of approval, material in the pile may then be moved to a second covered phase for at least 14 calendar days.

Phase II:

- 105°F for 7 non-consecutive days

If the Phase II temperature conditions above and the Oxygen Parameter provisions defined below are met as required by Condition No. 6 of the current Agency NOC order of approval, material in the pile may then be moved to a third phase for at least 14 calendar days.

Temperature Monitoring/Recordkeeping Requirements (Phase I and Phase II)

The temperature value for each day of operation shall be the average of the temperature data collected by the probe at the "T5/°F" sensor for a pile during that day.

Use of the T5 sensor data for this purpose must be based on at least 75% of the required data was recorded for that day. In the event that data recovery in at least this percentage (75%) is not met in the T5 sensor, Cedar Grove may use another temperature sensor for that pile providing it is reported to the Agency that an alternate sensor data was used for the pile in the next monthly report submitted to the Agency.

Days that the probes have been removed according to Cedar Grove's Wind Safety Protocol (below) or are not recording data due to a power outage are exempt from this data recovery percentage. If the probes are not recording temperature data for these reasons, Cedar Grove may manually test the pile. No temperature data may be assumed for the temperature parameters identified above during periods of missing data.

For any Phase I or Phase II pile that did not meet the 105°F temperature parameter identified above on a continuous day basis (12 days continuous in Phase I, 7 days continuous in Phase II), Cedar Grove shall provide information about that pile in the monthly report identified below.

Oxygen Parameters

Cedar Grove shall maintain aerobic conditions in Active composting piles. This is accomplished using one of the four available software operating modes:

(1) O2 Control Mode (primary)
(2) Interval Mode
(3) Failsafe Mode (aka Safety Mode)
(4) Manual Mode

O2 Control Mode

All computer operators will be trained to use O2 Control Mode as the primary mode of operation. O2 Control Mode is backed up by Failsafe Mode. Use of Failsafe Mode does not mean that the pile is anaerobic but that adjustments and/or corrective action by the operator may be necessary. All constructed piles (Phase I and Phase II) will be placed into O2 Control Mode on Day 1 of active composting. On computer monitoring days (Monday-Friday, excluding

holidays), the computer operator will monitor all piles using the current computer software including a daily check on piles and O2 activation/deactivation settings. On other days, the computer operator will monitor all piles using remote access and security alerts, if available. If a pile has reverted into Failsafe Mode, the computer operator will conduct a troubleshooting exercise and check for the following:

- Component malfunctions with repair or replacement as needed;
- Probe insertion or clogging related issues; and/or
- O2 activation and deactivation settings.

All computer operators will be trained by GORE and use best efforts to ensure that when operating in O2 Control Mode that no pile registers more than the total days in Failsafe, Interval or Manual Mode as specified below for Phase I and Phase II operations. If this occurs, Cedar Grove will document this circumstance, all corrective actions taken, and report it (including the information identified below) in the monthly report to PSCAA. Days that the probes have been removed according to Cedar Grove's Wind Safety Protocol (below) or are not recording data due to a power outage will not be counted against the total day requirements below.

Phase I:

The oxygen parameter requirements to indicate that composting is sufficiently complete in Phase I of the composting process shall be demonstrated by the following:

- The pile operated in O2 Control Mode for the duration of the required process time: OR
- The pile has no more than 7 days of operation in any mode other than O2 Control Mode; AND
- For any period of time when O2 Control Mode was not being used in a phase, O2 was monitored and O2 data was recorded for that pile.

If these Phase I Oxygen Parameters above and the Phase I Temperature conditions defined above are met as required by Condition No. 6 of the current Agency NOC order of approval, material in the pile may then be moved to a second covered phase for at least 14 calendar days.

Phase II:

The oxygen parameter requirements to indicate that composting is sufficiently complete in Phase II of the composting process shall be demonstrated by the following:

- The pile operated in O2 Control Mode for the duration of the required process time: OR
- The pile has no more than 5 days of operation in any mode other than O2 Control Mode; AND
- For any period of time when O2 Control Mode was not being used in a phase, O2 was monitored and O2 data was recorded for that pile.

If these Phase II Oxygen Parameters above and the Phase II Temperature conditions defined above are met as required by Condition No. 6 of the current Agency NOC order of approval, material in the pile may then be moved to the third phase for at least 14 calendar days.

Oxygen Monitoring/Recordkeeping Requirements (Phase I and Phase II)

Days are defined for the Oxygen Parameters requirements above as any calendar day where at least 75% of the required data recorded (mode and O2 values combined) for that day meet the conditions above. Any operational day where at least 50% of the mode data recorded shows the pile is in O2 Control Mode qualifies as an O2 Control Mode day for the Oxygen Parameter requirements. Any day that the combined Oxygen Parameter data recovery does not meet 75% of the operational period for the day shall be included in the monthly report.

Days that the probes have been removed according to Cedar Grove's Wind Safety Protocol (below) or are not recording data due to a power outage are exempt from this data recovery percentage. All Wind Safety Protocol actions shall be included in the monthly report as identified below.

When Temperature or Oxygen Parameters are Not Met

If the oxygen and temperature monitoring data for each Gore System Phase I and Phase II pile indicates that composting is not sufficiently completed as defined above, the pile shall not move to the next phase in the process. If this condition occurs, (1) the pile may remain under cover until that data indicates the phase is complete or (2) remove the cover and blend the Phase I pile material into a new Phase I pile (or Phase II pile material into a new Phase II pile). As an alternative, the material may be returned to the tipping building and reprocessed to restart the composting process.

In situations when conditions are outside of Cedar Grove's control, including but not limited to, force majeure events such as power outages, wind/snow storms, earthquakes, etc., Cedar Grove will actively communicate and update PSCAA on facility status while taking reasonable corrective measures to return to normal operations as soon as practicable. Events of this nature must be documented in the next monthly report submitted to the Agency, discussed in part below.

Monthly Reporting

- In the event that Cedar Grove moves a pile to the next phase of composting without satisfying the Temperature and Oxygen Parameter criteria identified above, that information shall be provided in the next monthly report to PSCAA identified in Condition 14(b) of the current order of approval. This report item shall include date(s), pile ID information, operational data for that pile, and any operator logs or notes that relate to this event.

- In the event that Cedar Grove has any Phase I or Phase II pile that did not meet the 105°F temperature parameter identified above on a continuous day basis (*12 days continuous in*

Phase I, 7 days continuous in Phase II), that information shall be provided in the next monthly report to include date, pile ID information, information explaining the conditions observed, and corrective action taken (including date/time).

- In the event Cedar Grove starts any Phase I or Phase II pile in any mode other than O2 Control Mode, that information shall be provided in the next monthly report to include date, pile ID information, information explaining the conditions operators observed leading to this operational choice, and corrective action taken (including date/time).

- In the event Cedar Grove has operational periods where any Temperature or Oxygen Parameter data recovery requirements identified above that were not met, that information shall be provided in the next monthly report to include date(s), pile ID information, information explaining the conditions that contributed to the data loss, and corrective action taken (including date/time). This would include any event where Cedar Grove relies on alternative temperature data from a sensor other than T5.

With each of the report items above, Cedar Grove may include in the report information that explains how the event was unavoidable, not a result of inadequate design, operation, or maintenance.

Additional information that shall be included in the monthly report:

Identify time periods when the Wind Safety Protocol is implemented. Include in this report a copy of the forecast used to make this decision, the date/time temperature and oxygen probes were removed, the date and time the temperature and oxygen probes were reinstalled and operational, and the highest recorded wind speed onsite (including date and time) while the temperature and oxygen probes are not installed. Additionally, identify the date, time, pile ID, and data collected for any manual monitoring conducted during a Wind Safety Protocol or power outage event.

Wind Safety Protocol

On Monday-Friday, excluding holidays, Cedar Grove conducts a daily review of the weather forecast for wind speeds for the following days. If the windspeeds are expected to be at or above 18 mph, Cedar Grove will evaluate the conditions and determine whether to pull the temperature and oxygen probes for safety. The probes are returned as soon as conditions are deemed safe.

Cedar Grove will include in the monthly report the time periods when the Wind Safety Protocol is implemented. Included in this report will be a copy of the forecast used to make this decision, the date/time temperature and oxygen probes were removed, the date and time the temperature and oxygen probes were reinstalled and operational, and the highest recorded wind speed onsite (including date and time) while the temperature and oxygen probes are not installed.

The final two weeks occurs in Phase 3, where the material is uncovered to facilitate drying prior to screening. We may cover this third phase for the last two weeks for processing; See sampling plan for testing protocol.

3.2.1.6 *Pathogen Reduction.*

The Gore Cover and automated system (as described above) have been implemented for proper pathogen reduction activities. The temperature of the active compost pile (Phase 1 or Phase 2) for effective pathogen reduction will be maintained at 131°F or higher for three consecutive days. Temperatures will be recorded, documented, and maintained per the applicable solid waste handling regulations. *Nothing in § 3.2.1.6 changes or modifies any temperature or oxygen requirements in § 3.2.1.5 above.*