

Public Notice
PUGET SOUND CLEAN AIR AGENCY
Proposed Order of Approval No. 11573
Cedar Grove Maple Valley
17825 Cedar Grove Rd, Maple Valley WA 98038

The Puget Sound Clean Air Agency is providing public notice and public hearing for a proposed permit 11573 and associated Determination of Nonsignificance for the Cedar Grove Maple Valley facility. The items under review in this Notice of Construction (NOC) application fall into three categories: modifications to continuous monitoring of the biofilters and third party biofilter evaluations (category A); opening the second of two tipping building bay doors during operation along with associated changes to work practice standards and compliance demonstration for the tipping building (category B); and installation of a replacement grinder in the existing grinding building (category C).

The estimated potential emission increase associated with the change in method of operation of the tipping building is 8.4 tons/year volatile organic compounds (VOC) and 0.7 tons/year ammonia. The estimated potential emission increase associated with the replacement grinder is 61 lb/year particulate matter with aerodynamic diameter less than 10 micron (PM₁₀), with an estimated subset of 9 lb/yr of that PM₁₀ comprised of particulate matter with aerodynamic diameter less than 2.5 micron (PM_{2.5}). Grinder emissions are not an increase in facility-wide emissions as the grinder replaced a previous grinder serving the same function at the facility. The changes to biofilter monitoring and compliance demonstrations do not result in an increase of potential emissions.

PRELIMINARY DETERMINATION

NOC Application 11573 and proposed Order of Approval 11573 would cancel and supersede Order of Approval 10645. Only those items related to the requested changes from Cedar Grove under WAC 173-400-111(8) and the replacement grinder are subject to review in this NOC application. All other conditions of Order of Approval 10645 are transferred to proposed Order of Approval 11573 unchanged.

A summary of the Agency's determinations are as follows:

1. Requested modification to Condition No. 8 of OA 10645. The applicant has requested removal of any continuous monitoring of biofilter operating parameters, with this request originally submitted in an application required as part of the settlement agreement for Case No. 11-2-27192-7 SEA. This request falls into Category A: Changes to requirements for monitoring of the biofilters at the facility.

Agency Determination: Continuous monitoring will not be required on the tipping building and grinding building biofilters. Continuous temperature monitoring will be required on the upper and lower primary biofilters and the east and west secondary biofilters, with required corrective action when temperatures fall outside of acceptable, identifiable range. Continuous monitoring of velocity pressure, static pressure, and exhaust flow will not be required on any of the biofilters.

2. Requested modification to Condition No. 9 of OA 10645. The applicant has requested to decrease the frequency of required 3rd party evaluations from quarterly to semiannually and to increase report submittal time from 30 days after the completion of the evaluation to 60 days after the completion of the evaluation. This request falls into Category A: Changes to requirements for monitoring of the biofilters at the facility.

Agency Determination: Reduction in frequency of biofilter evaluation to semiannually is approved with clarification to acceptable ranges for moisture, free air space, pressure drop, empty bed residence time, oxygen content and pH and required corrective action, as well as required corrective action for visual structural deficiencies. A 60-day submittal time is also approved with the addition of a summary of initiated corrective actions to be included with the report submittal.

3. Requested modification to Condition No. 13 of OA 10645. The applicant has requested to remove the requirement to keep the second bay door of the tipping building closed during grinding, and has proposed installation of an odor neutralizing spray curtain for the bay door. This request falls into Category B: Changes to the method of operation and capture efficiency compliance demonstration for the Tipping Building and Grinding Building.

Agency Determination: Opening the bay door constitutes a change in the method of operation of the tipping building and triggered a review of Best Available Control Technology (BACT). The request to open the bay door is approved with modification to Condition Nos. 12 and 13 of OA 10645 to require feedstocks remaining in the tipping building and grinding building for longer than 24 hours to be covered with at least 12 inches of biofilter media for surfaces of the feedstock pile accessible by front loader. The second bay door must also remain closed when material is stored in the tipping and grinding buildings for longer than 24 hours. The determination also requires a limit of 5% opacity at the tipping building doorway. The Agency does not find that the odor curtain constitutes BACT for modification to the tipping building operation and its installation is not approved.

4. Requested change in compliance determination of 10645 Condition No. 14 from the observation of no visible emissions during release of test smoke or other method specified in an Agency approved test plan to a modified smoke test procedure of confirming test smoke placed in front of the building fan is passing through the biofilter and measuring airflow to be greater than 4 air changes per hour. This request falls into Category B: Changes to the method of operation and capture efficiency compliance demonstration for the Tipping Building and Grinding Building.

Agency Determination: The change in the method of operation of the tipping building triggered a review of BACT and associated compliance demonstration for the tipping building and grinding building. In addition to the work practice standards proposed in Condition Nos. 12 and 13, and associated recordkeeping in Condition No. 16 of proposed NOC 11573, the compliance demonstration of Condition No. 14 includes measurement of minimum airflows to show at least 4 air changes per hour (with specified air flows included in the condition). Use of test smoke is not included in the updated compliance determination.

5. Requested change in frequency of smoke tests of 10645 Condition No. 15 from quarterly to semiannual. This request falls into Category B: Changes to the method of operation and capture efficiency compliance demonstration for the Tipping Building and Grinding Building.

Agency Determination: Use of test smoke is not included in the updated compliance demonstration for the new method of operation of the tipping building and grinding building. The flow measurements of Condition No. 14 are required at a semiannual frequency. Proposed OA 11573 removes Condition No. 15.

6. Review of grinder replacement. PSCAA inspection identified a new grinder on-site during the July 12, 2023 inspection and NOC application 11573 was updated to include review of the grinder. This review falls into Category C: Review of a replacement grinder in the existing Grinding Building.

Agency Determination: The grinder must be operated within the grinding building. The 5% opacity limit at the tipping building door includes any emissions which may occur from the grinder operation.

Based on this review, the Agency has made a preliminary determination that the proposal meets all the requirements of Regulations I, II, and III, and draft Order No. 11573 should be approved, subject to the conditions in the draft Order of Approval.

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

PUBLIC COMMENT

The proposed Order of Approval and Determination of Nonsignificance (along with the information considered in making this determination) are available from the Agency's website at www.pscleanair.gov. These documents are also on file and available for inspection at the Agency's office located at 1904 Third Avenue, Suite 105, Seattle, Washington, telephone (206) 343-8800. Written comments with respect to the proposed Order and Determination of Nonsignificance must be mailed to Madeline McFerran, Engineer, at Puget Sound Clean Air Agency, 1904 Third Avenue, Suite 105, Seattle, Washington 98101, faxed to the Engineering Manager at (206) 343-7522, or e-mailed to PublicComment@pscleanair.gov by 4:30 PM on January 31, 2025.

A public hearing on the proposed Order of Approval and Determination of Nonsignificance will be held on Zoom from 4 PM to 6 PM on January 23, 2025. The hearing may be accessed at the following web address:

<https://us02web.zoom.us/j/84992560100>

Meeting ID: 849 9256 0100

Passcode: 063243

The hearing may also be accessed by phone by dialing (253) 205-0468 and entering the Meeting ID and Passcode listed above.

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

To be published in the following papers on December 19, 2024

- [Seattle Times](#)
- [Daily Journal of Commerce](#)
- [Covington and Maple Valley Reporter \(online\)](#)