AGENCY USE ONLY	NOC#:	REG#:	Date Fee Pd:	Eng. Assigned:
	11573	25994	3/28/18	STC

pscleanair.org
Puget Sound Clean Air Agency

Puget Sound Clean Air Agency
1904 Third Avenue, Suite 105 | Seattle, WA 98101-3317
Phone 206-343-8800 | 206-343-7522 Fax

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Puget Sound Clean Air Agency

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NOTICE OF CONSTRUCTION APPLICATION FOR ORDER OF APPROVAL

The following information must be submitted as part of this application packet before an Agency engineer is assigned to review your project.

PAID 3/28/18
AMOUNT 1150.00
CK. NO. 128228
RCPT. NO. 99371

SECTION 1. FACILITY INFORMATION

Business Name			
CEDAR GROVE COMPOSTING			
Equipment Installation Address	City	State	Zip
17825 CEDAR GROVE Rd. S.E.	MAPLE VALLEY	WA	98038
Is the business registered with the Agency at this equipment installation address? ☐ Yes. Current Registration or AOP No. _____ ☐ No, not registered ☐ Unknown			
Business Owner Name			
J. STEPHAN BANCHERO			
Business Mailing Address	City	State	Zip
7343 E. MARGINAL WAY S.	SEATTLE	WA	98108
Type of Business			
COMPOST FACILITY			
NAICS Code	NAICS Description		
325314	FERTILIZER MANUFACTURING.		
Contact Name (for this application)	Phone	Email	
RON WESTMORELAND	206-450-6182	ronw@cgcompost.com	
Provide a 1-2 sentence simple description of this project: REQUEST FOR PERMIT MODIFICATION SPECIFICALLY RELATED TO BUILDING VENTILATION EVALUATIONS & SMOKE TESTING PROCEDURES AND FREQUENCY.			

SECTION 2: REQUIRED APPLICATION PACKET ATTACHMENTS

1) **$1,150 filing fee** (nonrefundable)

☒ PAY BY CHECK – Attached and made payable to **Puget Sound Clean Air Agency**

☐ PAY BY CREDIT – Accounting technician will contact person identified below for payment information

Contact Name:	Contact Number:
SAME	SAME

NOTICE OF CONSTRUCTION APPLICATION FOR ORDER OF APPROVAL

SECTION 2: REQUIRED APPLICATION PACKET ATTACHMENTS (CONT)

2) **Detailed Project Description**
The project description must include a detailed description of the project, a list of process and control equipment to be installed or modified, a description of how the proposed project will impact your existing operations (if applicable), and measures that will be taken to minimize air emissions.
Detailed description of the proposed project included in packet?
☒ YES, attached.
☐ NO, not attached. This application is incomplete.

3) **Process flow diagram**
☒ YES, attached.
☐ NO, not attached. This application is incomplete.

4) **Emission estimate**. Emission rate increases for all pollutants.
☒ YES, attached.
☐ NO, not attached. This application is incomplete.

5) **Environmental Checklist** (or a determination made by another Agency under the State Environmental Policy Act) http://www.pscleanair.org/DocumentCenter/View/170
☒ YES, attached.
☐ NO, not attached. This application is incomplete.

6) Attach **equipment form**(s) applicable to your operation. Forms are available online at http://www.pscleanair.org/178/Apply-for-Notice-of-Construction-Permit
☐ YES, attached.
☐ NO, not attached. This application is incomplete.

SECTION 3: CERTIFICATION STATEMENT

I, the undersigned, certify that the information contained in this application and the accompanying forms, plans, specifications, and supplemental data described herein is, to the best of my knowledge, accurate and complete.

R. E. Westmoreland — Signature

3-23-2018 — Date

RON E. WESTMORELAND — Printed Name

GENERAL MANAGER. — Title

SECTION 4: APPLICATION SUBMITTAL

☐ **EMAIL application and attachments to:**
NOC@pscleanair.org

-OR-

☒ **MAIL application, payment, and attachments to:**
Puget Sound Clean Air Agency
ATTN: NOC Application Submittal
1904 3rd Ave, Suite 105
Seattle, WA 98101

THIS SECTION FOR AGENCY USE ONLY						
Eng. Assigned (Compliance Mgr)	Eng. Rec'd (Eng)	Web description (Eng)	Completeness review (Eng)	Routed for OA Prep (Eng)	OA signed (Compliance Mgr)	OA mailed (Admin)
Date:	Date:	Date:	Date:	Date:	Date:	Date:

Appendix B
PSCAA NOC Form P

CEDAR GROVE®

7343 E. Marginal Way S.
Seattle, WA 98108

March 23rd, 2018

Puget Sound Clean Air Agency

Attn. Applications and Permitting Department

1904 3rd Ave Ste. 105

Seattle, WA 98101-3317

To Whom It May Concern,

Cedar Grove Composting's Maple Valley facility located at 17825 Cedar Grove Rd. SE, Maple Valley, WA 98038 is submitting the following Notice of Construction application and supporting documents for Agency review and Approval.

You will find enclosed with this Cover letter the following documents:

1. Permit Modification Request from CH2MHILL dated March 2018.
2. Appendix A- Technical Memorandum: Tipping Building Ventilation Review.
3. Appendix B-Notice of Construction and Application for Approval form dated March 23rd, 2018.
4. Environmental Checklist dated November 23rd, 2018.
5. Check Enclosed-$1150.00 Permit Application Fee.

Please accept the information as complete for your review and let me know if additional information will be requested.

Sincerely,

R. E. Westmoreland

Ron Westmoreland | General Manager | Cell: (206) 450-6182 | office: (206) 832-3200 | ronw@cgcompost.com
Local Organic | Customer Service: 877-764-5748 | www.Cedar-Grove.com

Cc : Seattle King County Public Health - Yolanda Pon

FINAL

Permit Modification Request for Cedar Grove Composting, Maple Valley Facility

Prepared for

Cedar Grove Composting, Inc.

Submitted to

Puget Sound Clean Air Agency

March 2018

CH2M HILL Engineers, Inc.
1100 112th Avenue NE Suite 500
Bellevue, WA 98004
(425) 453-5000
(425) 468-3100

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Appendix

A Tipping Building Ventilation Review Memorandum
B PSCAA NOC Form P

Figures

1-1 Door Odor Curtain

Acronyms and Abbreviations

BACT	Best Available Control Technology
Cedar Grove	Cedar Grove Composting, Inc.
CH2M	CH2M HILL Engineers, Inc.
EPA	U.S. Environmental Protection Agency
NAAQS	National Ambient Air Quality Standards
NESHAPs	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
PSCAA	Puget Sound Clean Air Agency
RACT	Reasonable Available Control Technology
TAP	toxic air pollutant
WAC	Washington Administrative Code

SECTION 1

Background

Cedar Grove Composting's Maple Valley facility (Cedar Grove) is located at 17825 Cedar Grove Road, Maple Valley, Washington. The facility currently operates under Notice of Construction, Order of Approval No. 10645 issued by the Puget Sound Clean Air Agency (PSCAA).

Cedar Grove composts residential and commercial yard and food waste, diverting material that would otherwise be mixed in with trash and shipped to landfills and instead uses it as feedstock to create nutrient-rich soil products.

Onsite emissions from the facility are created by feedstock tipping, mixing, and grinding. The tipping building is continuously loaded and unloaded during the course of a normal day of operation. The building is 100 feet by 100 feet square, with two doorways for truck and wheel loader access, however only one door is open. All four walls (except the doorway) and both gable ends of the building are fully enclosed, so the air space under the roof section serves as a hood or capture device for the emissions. Plastic strips hang from the doorway header to enhance this capture effect, and an additional canopy, the tipping building extension (100 feet by 50 feet), extends beyond the opening to ensure all unloading of trucks and storage of materials for processing is under cover. The organic waste has some latent heat and moisture, which tends to be warmer than the ambient air, and can carry odors, if odors are present. This warmer air creates a slight lift that causes feedstock pile odors to rise into the roof section of the building.

The ventilation design requirement for composting facilities that are not co-composting is four air exchanges per hour, which also results in the building being under negative air pressure. The tipping building is an existing structure that was initially designed for four air exchanges per hour, and was later increased to almost six air exchanges per hour with the addition of the new sorting biofilter.

Cedar Grove is required by PSCAA to conduct smoke testing to show that it is meeting ventilation requirements. Order of Approval No. 10645, Condition 14 established the requirement that during the smoke test "no visible smoke" escape the building. The condition was established earlier in Order of Approval No. 10052 dated December 22, 2010. The purpose of the smoke test is to evaluate the ventilation systems ability to pull air from the building to the biofilter. PSCAA has stated the "no visible smoke" is not a goal, but an enforceable condition. Both Cedar Grove and PSCAA agree that the real concern is about odors leaving the building, not the smoke. However, Cedar Grove has questioned how well the behavior of the smoke represents the behavior of the odor molecules from feedstock.

On April 17, 2017, Cedar Grove and PSCAA had a meeting to discuss two items: (1) the smoke test procedure developed by PSCAA, and (2) how the new smoke test procedure resulted in the establishment of a Reasonably Available/Best Available Control Technology (RACT/BACT) level of 100 percent control on the tipping building ventilation system at Cedar Grove's Maple Valley facility. Before the meeting, CH2M HILL Engineers, Inc. (CH2M) submitted a memorandum to PSCAA titled "Cedar Grove Composting, Inc. Building Ventilation Test Procedures" dated April 13, 2017. The memorandum provided a history of the ventilation smoke test procedures at Cedar Grove Maple Valley. The main types of potential paths forward discussed during the meeting were:

1. Proposing modifications to the test procedures so that the procedures will still challenge the system, while more closely representing the flow pattern of the odors in the building.
2. Investigating new mechanical options to assist the system with achieving the goal of no visible smoke.
3. Implementing a combination of test procedure modifications and mechanical options.

As a result of that meeting, CH2M (now Jacobs) prepared a memorandum reviewing potential options that might help Cedar Grove accomplish 100 percent capture of the smoke from the smoke test, "Cedar Grove Composting, Inc. Tipping Building Ventilation Review," dated December 18, 2017 (included in Appendix A). The conclusion of the memo was that CH2M was not able to identify any available or feasible control technologies demonstrating the ability to have no visible smoke emissions from the doorway. Additionally, Cedar Grove and CH2M have not seen the 100 percent capture requirement applied to other facilities similar to Cedar Grove's, including smaller, fully enclosed composting or co-composting facilities. For this reason, there are no examples of proven technology that Cedar Grove and CH2M can reference.

At a January 18, 2018 meeting to discuss the memo, the parties agreed that the smoke test presented unique challenges and that it may be in Cedar Grove's best interests to modify its permit.

1.1 Proposed Project

The odor curtain technology, discussed in the December 2017 ventilation review memorandum, has been used on a doorway as large as the one on the tipping building. It has demonstrated effectiveness at reducing odors, but has not demonstrated the ability to reduce smoke to a level of 100 percent control of visible emissions during a smoke test. Therefore, the technology could not be considered technically feasible as a means to provide 100 percent control of visible smoke emissions.

However, Cedar Grove and CH2M are proposing the installation of an odor curtain on the two truck doorways on the tipping building, in addition to revised ventilation testing. PSCAA General Information for Notice of Construction Permits-Form P is included in Appendix B. The odor curtain will be operated when there is feedstock in the building and the affected doorway is open, to reduce any odors that may exit through the doorway. In addition, the smoke test procedures will no longer be used to demonstrate no visible emissions, but will be used to demonstrate that the ventilation system is working and emissions are being sent to the biofilter as designed.

1.1.1 Door Curtain Odor Control

Odor curtains are designed to treat odor emissions that pass through an open doorway or open exterior wall. Odor-neutralizing liquids are converted to a vapor and dispersed by diffusion nozzles placed around the frame of the doorway. This odor scavenging technology is often used to control odors at waste transfer facilities and landfills. Figure 1-1 shows the basic design of the door odor curtain.

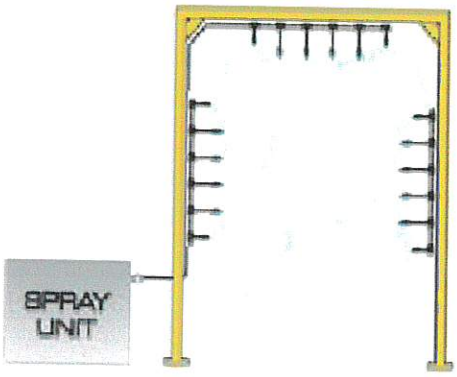

Figure 1-1. Door Odor Curtain

Transfer stations have odors similar to a compost receiving buildings, and transfer station odors can be even stronger because the waste can contain up to 30 percent food waste plus putrescible garbage. The

volumes of material handled and the sizes of the facilities can be significantly larger than composting facilities, and the hold times for the materials are similar.

Transfer stations use delivery systems that target odors at specific odorous locations. Sometimes just door odor curtains are used, but many of the larger facilities use ceiling odor misters. Ceiling odor misters are not always on, but can be turned on or off by an operator over specific locations where odors are present. Transfer stations typically do not use biofilters to control odors from the building.

Landfills have also been known to use odor scavenging technology, installing misters at the property line to reduce odors leaving the site. Cedar Grove has used a similar system in the form of misters that disperse an odor surfactant on processes that have a potential to generate odors, such as screening material.

Cedar Grove already has a ventilation system and biofilter controlling the odors inside that building, so the addition of ceiling misters is not being proposed. Cedar Grove is proposing the addition of an odor curtain around the large truck access doors. This would be a new application of the technology, since we have not found any evidence that it has been used for this specific application at a composting facility. However, based on the apparent success this technology has had on controlling odors at other recycling and waste handling facilities, Cedar Grove believes it is a viable technology for this application. If PSCAA approves this approach, along with the changes to the smoke test procedures, Cedar Grove will work with a firm specializing in this technology to design the odor curtains. The number and position of the nozzles and the amount and type of odor-neutralizing liquid to be used will be determined during the design phase and submitted to the agency for review before construction begins.

1.1.2 Smoke Test Procedures

The ventilation design requirement for composting facilities that are not co-composting is four air exchanges per hour. Smoke tests are generally conducted to demonstrate that the smoke is moving through the ventilation system and to the control device, in this case the biofilter. Cedar Grove proposes the following smoke test procedure to be included as a condition in the permit:

> A smoke test will be conducted biannually. The smoke will be generated at the centroid of the interior volume that is above the resident feedstock pile or on the floor in front of the center of the pile. The smoke will be generated by one Superior Smoke candle #3WC (or Agency-approved equivalent) which produces 40,000 cubic feet of white smoke. The smoke will be observed and recorded on video, entering the ventilation system and exiting from the surface of the biofilter. Each smoke test shall be no less than 105 calendar days since the last evaluation and no more than 210 calendar days since the last evaluation.

SECTION 2

Proposed Permit Modifications

In addition to proposing the installation of door odor curtains and new smoke test procedures, Cedar Grove would like to request additional modifications to Notice of Construction, Order of Approval No. 10645, described below.

2.1 Remove Condition 8

Condition 8 states:

> 8. Within 90 days of the date of this Order, Cedar Grove shall install and operate continuous parameter monitoring systems on all biofiltration systems. The monitoring systems shall measure and record velocity pressures, static pressures, and temperatures on a one-hour average basis. A continuous parameter monitoring plan that delineates locations and monitoring methods shall be submitted to the Agency for approval prior to installation of the continuous parameter monitoring system. This plan shall be submitted to the Agency no later than 30 days after the approval date of this Order. In addition, until the continuous parameter monitoring systems are installed, Cedar Grove shall measure and record these parameters manually at least once per operating day. Manual velocity measurements shall use EPA Reference Method 2 (Type S Pitot Tube).

This condition was the result of a settlement agreement between Cedar Grove Composting, Inc. and PSCAA, (Case No. 11-2-27192-7 SEA). The continuous parameter monitoring system was only intended to be in place for a 2-year trial period. The commitment to provide PSCAA with 2 years of data has been filled, so Cedar Grove believes the condition should be removed from the permit.

2.2 Modify Biofilter Inspection Frequency (Condition No. 9)

Cedar Grove would like to return to biannual inspections and increase the report submittal time. The Maple Valley facility switched from biannual testing to quarterly testing as a result of a Settlement Agreement, Notice and Order of Civil Penalty, No. 08-064CP in 2008. The quarterly inspections and the data provided by the continuous parameter monitoring system have demonstrated that changes in the biofilter system are very slow. Conducting inspections twice a year is sufficient for monitoring changes to the system.

Cedar Grove would also like to extend the report submittal time from 30 days to 60 days, which is consistent with other test reports. The turnaround time to get results from the lab on the biofilter media samples can take up a significant portion of the 30 days, leaving little time to re-analyze samples, if needed, and to complete the report. In addition, if any issues are discovered during the inspection, they are generally reported to Cedar Grove the day of the inspection for immediate correction or for submittal as a deviation if necessary.

Cedar Grove suggests modifying the language in Condition No. 9 as follows:

> 9. Cedar Grove shall have the operations of the tipping building, pre-processing/sorting and grinding building, zone 7 building and biofilters reviewed and evaluated by an independent third party biannually. Each evaluation shall be no less than 150 calendar days since the last evaluation and no more than 210 calendar days since the last evaluation. A copy of the written evaluation report shall be submitted to the Agency no later than 60 days after the evaluation date. The purpose of this evaluation is to review the performance of the emission capture system for these buildings and the biofilter operation. The evaluation shall include...

2.3 Remove Condition to Keep Door Closed (Condition No. 13)

With the installation of odor curtains on the two truck access doors on the tipping building extension, Cedar Grove would like to modify Condition 13.

> 13. Cedar Grove shall continuously store and/or handle materials described in Condition No. 12 either inside the tipping building or pre-processing/sorting and grinding building, and not expose the material in any way to ambient air until after being processed in the preprocessing/sorting and grinding building. The odor curtain will be in operation when the tipping building truck access doors are in operation and feedstock material is in the building. Additionally, any other access door into the sorting building, excluding the connection tunnel with the operating grinder, shall remain closed at all times when grinding is taking place, except when delivery trucks are entering or exiting while grinding is taking place.

2.4 Remove No Visible Emission Requirement (Condition No. 14)

Cedar Grove would like to remove the no visible emission requirement:

> 14. Emissions from the tipping building, and the pre-processing, sorting, and grinding building, shall be captured and passed through the biofilter. Compliance with this requirement shall be determined by observation of the smoke test in Condition No. X and by measuring the airflow to the tipping and sorting biofilter to determine if the airflow is greater than four air exchanges per hour.

2.5 Modify Frequency of Smoke Tests (Condition No. 15)

Cedar Grove would like to return to biannual inspections and conduct the smoke test in conjunction with the inspections, since airflow measurements will be taken at that time. With the addition of the odor curtain, biannual inspections should be more than sufficient. Whether or not the odor curtain is operating will be easily verified by visual observation.

> 15. Biannually, Cedar Grove shall perform testing for the buildings/enclosures with negative ventilation systems. Each test shall be conducted no less than 150 days and no more than 210 days since the last test. Cedar Grove shall record the date and start time of each ventilation test in a monthly log, and the test results (pass or fail). Each of these tests shall be recorded in a digital video format to document the results of the test, maintained on site for 2 years, and made available to the Agency upon request. Cedar Grove shall have additional test kits available at the facility, consistent with the currently approved procedures, for use when directed by Agency personnel during inspections.

SECTION 3

Emissions

There will be no increase in emissions of criteria, toxic, or hazardous air pollutants due to the proposed modifications. The proposed project should result in a decrease in odor emissions from the tipping building.

SECTION 4

Regulatory Requirements

The permit modification requests documented herein will not alter the currently applicable sections of federal and Washington state air pollution laws and regulations, or the applicable sections of PSCAA Regulations I, II, and III.

4.1 Federal Regulations

4.1.1 NSPS or NESHAP Applicability

The New Source Performance Standards (NSPS) are uniform national U.S. Environmental Protection Agency (EPA) air emission standards that limit the amount of pollution allowed from new sources or from modified existing sources.

The National Emissions Standards for Hazardous Air Pollutants (NESHAPs) are emissions standards set by EPA for air pollutants not covered by National Ambient Air Quality Standards (NAAQS) that may cause an increase in fatalities or in serious, irreversible, or incapacitating illness. Primary standards are designed to protect human health, and secondary standards to protect public welfare (e.g., building facades, visibility, crops, and domestic animals).

This permit modification request contains no applicable NSPS or NESHAPs.

4.1.2 Prevention of Significant Deterioration

Federal and state regulations that are intended to prevent significant deterioration of existing air quality apply to certain new or modified air pollution sources that have the potential to be a major source of pollutants and emit more than 250 or 100 tons of specific pollutants, depending on the source category. Cedar Grove's Maple Valley facility is not a major source.

4.2 Washington State Regulations

The Puget Sound Clean Air Agency (PSCAA) has primary jurisdiction over the subject source. PSCAA has general regulations for air pollution sources found in PSCAA Regulation 1. A summary of the pertinent regulations are presented in this section.

4.2.1 Puget Sound Clean Air Agency

The PSCAA has regulatory authority over the Cedar Grove, Maple Valley facility. The operation of the composting facility must comply with the following applicable Puget Sound Clean Air Agency regulations that address visible emissions and nuisances (including odors).

1. **PSCAA Regulation 1, Section 9.03** – Addresses the visual standard.
2. **PSCAA Regulation 1, Section 9.11** –Addresses detriment to person or property standards and odors.
3. **PSCAA Regulation 1, Section 9.13** – Addresses concealment and masking of air contaminants.
4. **PSCAA Regulation 1, Section 9.20** – Requires that machinery and equipment be maintained in good working order.

PSCAA Regulation 1, Section 6.03 states: *It shall be unlawful for any person to cause or allow the establishment of a new source, or the replacement or substantial alteration of control equipment installed on an existing source, unless a "Notice of Construction application" has been filed and an "Order of Approval" has been issued by the Agency.*

NOC permits are required for a variety of stationary air contaminant generating equipment and air pollution control equipment. Agency Regulation I Section 6.03 also discusses which types of equipment require permits as part of the NOC process. All non-exempt emission units must go through a technology review to determine Best Available Control Technology (BACT) for criteria, TAP, and GHG emissions. The facility must also estimate emissions from the affected units and determine if there are any ambient impacts as a result of those emissions.

4.2.2 Washington Air Toxics Regulations (Chapter 173-460 WAC)

The State of Washington's air toxics regulations are established in Chapter 173-460 WAC, Controls for New Sources of Toxic Air Pollutants. The air toxics rule requires that new stationary sources with the potential to emit toxic air pollutants (TAPs) demonstrate that the TAP emissions are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects. Since the project does not involve a new source and the emissions of TAPs will not increase as a result of the project, Chapter 173-460 WAC is not applicable.

4.3 Best Available Control Technology

BACT requirements are intended to ensure that a proposed facility will incorporate control systems that reflect the latest techniques used in a particular industry, allow for future growth in the vicinity of the proposed facility, and not result in the exceedance of NAAQS or other standards imposed at the state level. The BACT evaluation requires the documentation of performance levels achievable for each air pollution control technology applicable to the facility under evaluation.

BACT for VOCs and odor from feedstock receiving at composting facilities is the use of a building to hold the feedstock and a ventilation system designed to send the odors from the building to an odor control device like a biofilter. Cedar Grove already has this type of control technology in place. However, in recent years, new odor control systems have been developed using odor neutralizers that have been tested using EPA guidelines.

Cedar Grove and CH2M were unable to find any indication that a door odor curtain using odor neutralizers has ever been installed on a tipping building door at a composting facility. However, this type of technology is frequently installed at waste transfer stations. Ceiling odor misters were installed in both the Seattle Public Facilities North Transfer Station and the King County Bow Lake Recycling and Transfer Station. Reports from personnel at the facilities indicate that the systems are effective at controlling odors and that odor complaints have been minimal. The transfer stations did not appear to have air permits, therefor the misting systems have not been determined to be BACT for transfer station. The use of odor misters does appear to be one of the design requirements for these facilities.

Based on those successful applications of this odor control technology, Cedar Grove believes the odor mister technology is feasible and will provide odor reductions if any odorous emissions were to leave the open tipping building door. The exact level of odor reduction cannot be predicted, but based on the lack of odor complaints around transfer facilities we believe the reduction will be significant and will help assure that odor from the tipping building will not move beyond the property line.

4.4 State Environmental Policy Act

The requested changes to the existing Notice of Construction, Order of Approval No. 10645 are not substantially different from the original project and are covered by the State Environmental Policy Act document submitted for that approval order.