

# Puget Sound Clean Air Agency

Notice of  
Construction No. **10455**

Registration No. **24934**

Date  
**AUG 21 2012**

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

**Clean Air Agency**

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.

## APPLICANT

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

## OWNER

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

## INSTALLATION ADDRESS

**Cedar Grove Composting, Inc, 3620 36th PI 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.

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## 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.
- (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 as normally provided by the Gore System.
- (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.
- (d) If the oxygen and temperature monitoring data for each Gore System pile indicates that composting is not sufficiently completed for each phase that is monitored, the pile shall remain under cover until that data indicates the phase is complete.
- (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.

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### 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.

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- (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 biannually. 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

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- (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 they 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 biannual review report shall be submitted to the Agency with the monthly report required by Condition No. 14 of this Order for the month 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..

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- (b) Date, time, and description of any action taken to extend the Phase I or Phase II time 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) Tipping building and biofilter review report, as specified in Condition No. 11(d) of this Order.
- (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. 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. 10455 cancels and supersedes Order of Approval No. 10301, dated August 3, 2011.

### 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.

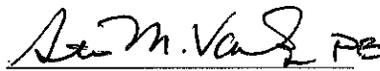
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Claude Williams  
Reviewing Engineer

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Steven Van Slyke  
Compliance Manager