



Puget Sound Clean Air Agency

Notice of
Construction No. 10494

Registration No. 28983

Date **APR 01 2014**

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

Temporary Expansion of an existing Aerated Static Pile (ASP) and Mass Bed Composting Facility from 30,000 to 75,000 tons per year; of Agricultural Organics (Cow Manure, bedding, and Paunch), pre and post-consumer food waste, and yard waste.

APPLICANT

**Jason Lenz
Lenz Enterprises Inc
PO Box 868
Stanwood, WA 98292**

OWNER

**Lenz Enterprises Inc
PO Box 868
Stanwood, WA 98292**

INSTALLATION ADDRESS

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.
3. Feed stocks: Allowable feed stocks for composting at this facility are those approved in the Snohomish County Solid Waste permit #SW-182, issued July 1, 2013.
4. Facility Wide Inspections - Fugitive Dust
 - (a) Lenz Enterprises 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) Lenz Enterprises 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 facility O&M Plan or Puget Sound Clean Air Agency regulations.
 - (c) Lenz Enterprises shall, as soon as possible, but no later than one calendar day after identification, correct any

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compliance problems identified during this inspections.

5. Facility Wide Inspections - Odor

- (a) Lenz Enterprises shall conduct inspections of the property daily to ensure that all tipping building activities and aerated static 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 aerated static piles are operating properly.
- (b) Lenz Enterprises 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) Lenz Enterprises shall, as soon as possible but no later than one calendar day after identification, commence corrective actions any potential compliance problems identified during these inspections. Such corrective actions shall include (but are not limited to) aeration equipment repair, the repair or rebuilding of the biofilter, or the removal of standing water.

6. Tipping Building Feedstock Processing and Initial Compost Placement

- (a) With the exception of stumps, brush, clean wood, and land clearing debris, all material that is biologically active brought on site as composting feedstock is defined as Compostable Waste Material. All Compostable Waste Material brought on site by commercial haulers shall be deposited completely inside the tipping building. All compostable waste material received shall be pushed back south of the central leachate drain until processed.
- (b) All Compostable Waste Material shall be premixed for composting before leaving the tipping building. Once mixed and placed on a composting pad the material is defined as Actively Composting Material.
- (c) At the end of each workday, no Compostable Waste Material shall be stored onsite except in the tipping building, south of the central leachate drain, with a 6 inch cap of biofilter media. Actively Composting Material on site shall be stored only in the aerated static piles.

7. Aerated Pile Composting System

All Actively Composting Materials shall remain under controlled aeration, compost maturity test, Solvita Jar Test Method, reads 3.5 or Greater.

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

- (a) Lenz Enterprises may grind stumps, brush, finished compost "overs", and clean wood in a grinder not installed in the tipping building.
- (b) Lenz Enterprises shall install and properly operate a fine water mist system on any wood grinder to control fugitive dust.
- (c) Lenz Enterprises 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 grinders and screening equipment as measured by WDOE Method 9A.

9. Leachate Control and Use: Lenz Enterprises 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

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shall not be used for dust suppression, but may be used for moisture addition during feedstock preparation or moisture addition during the composting process.

10. Complaints

- (a) Lenz Enterprises shall establish a meteorology station capable of measuring and recording temperature, wind speed, and wind direction.
- (b) Lenz Enterprises 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 Lenz Enterprises may be the source of emissions related to the complaint, and a format for communicating results of investigation and advising complainants of Lenz Enterprises' corrective actions.
- (c) Lenz Enterprises shall record and investigate complaints received regarding air quality as soon as possible, but no later than one working day after receipt.
- (d) Lenz Enterprises shall commence corrective actions for any attributable problems to Lenz, 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.

11. 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 compostable waste material stored only south of the tipping building leachate floor drain.
- (b) Lenz Enterprises shall measure and record the exhaust flow rate collected from the tipping building once each month during normal operations.
- (c) Lenz Enterprises shall have smoke test kits which are suitable for evaluating the ventilation collection system patterns in the tipping building. These smoke test kits shall be available on site. Lenz Enterprises shall evaluate the collection system using the smoke test kits once a quarter and at any other time when requested by agency personnel.

12. Tipping Building & Biofilter Review

- (a) Lenz Enterprises shall have the tipping building and biofilter operations reviewed and audited by an independent third party 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

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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 the integrated system operation
- (b) The first annual review required by this condition shall be completed no later than the first full calendar quarter following approval of this Order.
- (c) Each annual review report shall be submitted to the Agency within 90 days of the review.

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. Temporary Order of Approval Conditions:

- (a) In order to support a future NOC application, Lenz Enterprises shall install and operate a continuous odor monitoring system that measures and reports results in odor units/cubic meter for two operational areas. The e-nose monitoring objectives shall include the ASP and the mass bed processing areas. The system shall be operational and collecting data no later than ninety days after date of this order of approval.
- (b) The continuous odor monitoring system identified in (a) of this condition shall be:
 - (i) E-noses currently owned by the agency, provided to Lenz on a two year loan; or
 - (ii) Other monitors proposed by Lenz, subject to prior approval by the agency, that provide equivalent continuous monitoring service to the e-nose devices available from the agency.
 - (iii) Calibration of continuous monitors shall be based on correlation with odor panel results (as defined by ASTM E-679, or equivalent).
- (c) Record all odor concentration data from the continuous odor monitoring system and compile it with the following additional operational data collected by Lenz
 - (i) Production levels
 - (ii) Composting parameter data (temperature, oxygen, pH, moisture content, bulk density/porosity, and Stability)
- (d) Within 30 days of the date of this order of approval Lenz Enterprises shall submit for Agency Approval, a Data Collection and Analysis Plan to support Condition No. 14 of this Order.
- (e) Report quarterly - Quarterly reports are due 30-days after the end of each calendar quarter. The reports will compare

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the data that is derived from the e-noses, the parallel parameter monitoring, weather data, the facility odor complaint log, and any odor complaint information available from the Clean Air Agency.

15. Lenz Enterprises shall submit a Notice of Construction application to obtain final approval for the proposed expansion of the facility following completion of the temporary data collection period approved through this Order of Approval. This Notice of Construction application shall be submitted to the Agency no later than December 1, 2015.

16. If the application identified in Condition No. 15 of this Order is complete by January 15, 2016, this Temporary Order of Approval will remain in effect until final action is taken on the application identified in Condition No. 15 of this Order.

17. This Order of Approval to establish a Temporary Expansion of an existing Aerated Static Pile Composting Facility from 30,000 to 75,000 tons per year hereby supersedes and cancels Order of Approval No. 9386 dated March 3, 2009.

18. If the application identified in Condition No. 15 of this Order is not complete by the date identified in Condition No. 16 of this Order, then this Temporary Order of Approval will expire on that day and Order of Approval No. 9386, dated March 3, 2009, will be restored and in effect.

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.



Claude Williams
Reviewing Engineer

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Steven Van Slyke
Compliance Manager