

April 30, 2025

Samantha Winkle
Meridian Hill Compost, LLC
13 Waterway Place, Suite 110
The Woodlands, TX 77380

RE: Final Air Discharge Permit for Compost Processing Facility

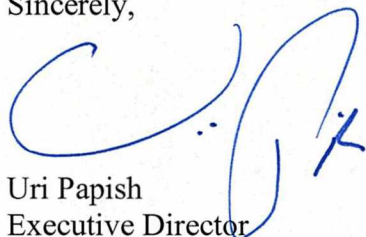
Dear Ms. Winkle:

A final determination to issue Air Discharge Permit (ADP) 25-3705 has been completed for ADP Application L-732 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP Application L-732 was published in the permit section of SWCAA's website on January 20, 2023. SWCAA did not receive a request for a public comment period in response to the public notice and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period will not be provided for this permitting action. Electronic copies of ADP 25-3705 and the associated Technical Support Document are available for public review in the "Recent Air Discharge Permits" section under the "Air Permits" link on SWCAA's website (<http://www.swcleanair.gov>). Original copies are enclosed for your files.

ADP 25-3705 may be appealed directly to the Pollution Control Hearings Board (PCHB) within thirty (30) days of receipt as provided in Revised Code of Washington (RCW) 43.21B.

If you have any questions or comments, or desire additional information, please contact me or Clint Lamoreaux at (360) 574-3058, extension 131.

Sincerely,



Uri Papish
Executive Director

UP:cl

Enclosure: Technical Support Document and Air Discharge Permit 25-3705





**AIR DISCHARGE PERMIT
25-3705**

Issued: April 30, 2025

Meridian Hill Compost LLC
Big Hanaford Road, Centralia, WA 98531

SWCAA ID – 2774

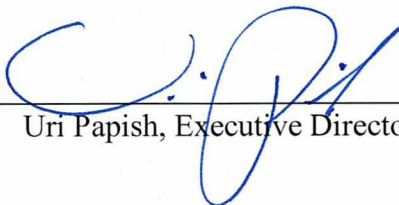
REVIEWED BY:

A blue ink signature of Clinton Lamoreaux, written in a cursive style.

Clinton Lamoreaux, Chief Engineer



APPROVED BY:

A blue ink signature of Uri Papish, written in a cursive style.

Uri Papish, Executive Director

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1. Equipment/Activity Identification

| ID No. | Equipment/Activity | Control Equipment/Measure |
|---------------|-------------------------------------|---|
| 1 | Reversing Aerated Composting System | Biofilter, Temperature Monitoring, Biofilm, Compost Turning |
| 2 | Finished Compost Screening | High Pressure Spray System |
| 3 | Aeration Ponds | Oxygen Diffusers |
| 4 | Haul Roads | Wet Suppression |

2. Permit Requirements

The following tables detail the specific requirements of this Air Discharge Permit (ADP). In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The requirement number is identified in the left-hand column. The text of the requirement is contained in the middle column. The emission unit, equipment, or activity to which the requirement applies is listed in the right-hand column.

Emission Limits

| Req. No. | Emission Limits | Equipment/ Activity ID No. | | | | | | | | | |
|--|---|--|-----------------|--|----------------------------|----------|--|---------|----------|------------|---|
| 1. | <p>Emissions from the Reversing Aerated Composting System must not exceed the following:</p> <table><thead><tr><th>Pollutant</th><th colspan="2">Emission Limits</th></tr></thead><tbody><tr><td>Volatile Organic Compounds</td><td>80.0 tpy</td><td>20 lb/hr (as C₃H₈)</td></tr><tr><td>Ammonia</td><td>6.75 tpy</td><td>1.54 lb/hr</td></tr></tbody></table> <p>The long-term emission limit is a 12-month rolling sum calculated consistent with Section 6 of the Technical Support Document (TSD) for this ADP. Short term limits are determined as a 1-hour average.</p> | Pollutant | Emission Limits | | Volatile Organic Compounds | 80.0 tpy | 20 lb/hr (as C ₃ H ₈) | Ammonia | 6.75 tpy | 1.54 lb/hr | 1 |
| Pollutant | Emission Limits | | | | | | | | | | |
| Volatile Organic Compounds | 80.0 tpy | 20 lb/hr (as C ₃ H ₈) | | | | | | | | | |
| Ammonia | 6.75 tpy | 1.54 lb/hr | | | | | | | | | |
| 2. | <p>Emissions from Finished Compost Screening must not exceed the following:</p> <table><thead><tr><th>Pollutant</th><th>Emission Limit</th></tr></thead><tbody><tr><td>Particulate Matter, PM₁₀, total</td><td>0.20 tpy</td></tr></tbody></table> <p>The long-term emission limit is a 12-month rolling sum calculated consistent with Section 6 of the TSD for this ADP.</p> | Pollutant | Emission Limit | Particulate Matter, PM ₁₀ , total | 0.20 tpy | 2 | | | | | |
| Pollutant | Emission Limit | | | | | | | | | | |
| Particulate Matter, PM ₁₀ , total | 0.20 tpy | | | | | | | | | | |

| Req. No. | Emission Limits | Equipment/ Activity ID No. | | | | |
|--|--|----------------------------|----------------|--|----------|---|
| 3. | <p>Emissions from Haul Roads must not exceed the following:</p> <table><tr><th>Pollutant</th><th>Emission Limit</th></tr><tr><td>Particulate Matter, PM₁₀, total</td><td>4.12 tpy</td></tr></table> <p>The long-term emission limit is a 12-month rolling sum calculated consistent with Section 6 of the TSD for this ADP.</p> | Pollutant | Emission Limit | Particulate Matter, PM ₁₀ , total | 4.12 tpy | 4 |
| Pollutant | Emission Limit | | | | | |
| Particulate Matter, PM ₁₀ , total | 4.12 tpy | | | | | |
| 4. | With the exception of emission from roadways, visible emissions must not exceed zero percent (0%) opacity for more than three (3) minutes in any one-hour period as determined in accordance with SWCAA Method 9. | 1-3 | | | | |
| 5. | Visible emissions from plant roadways must not exceed ten (10%) opacity for more than three (3) minutes in any one (1)-hour period as determined in accordance with SWCAA Method 9. | 4 | | | | |
| 6. | Toxic air pollutants must not exceed the respective Small Quantity Emission Rate (SQER) listed in WAC 173-460, unless it can be demonstrated that the emissions are below the respective Acceptable Source Impact level (ASIL) listed in WAC 173-460. | Facility-wide | | | | |

Operating Limits and Requirements

| Req. No. | Operating Limits and Requirements | Equipment/ Activity ID No. |
|-----------------|--|-----------------------------------|
| 7. | Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations. | Facility-wide |
| 8. | Operations that cause or contribute to a nuisance odor must use recognized good practice and procedures to reduce these odors to a reasonable minimum. | Facility-wide |
| 9. | Emission units and activities identified in this ADP must be maintained and operated in total and continuous conformity with the conditions identified in this ADP. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this ADP, including directing the facility to cease operations until corrective action can be completed. | Facility-wide |
| 10. | Each pollution control device must be operated whenever the processing equipment served by that air pollution control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, air pollution control devices must be operated in a manner that minimizes emissions. | Facility-wide |

| Req. No. | Operating Limits and Requirements | Equipment/ Activity ID No. |
|-----------------|---|---|
| 11. | Forced aeration must be used during the active composting phase. For the purposes of this requirement, the active composting phase ends when the carbon dioxide evolution rate is: (a) No more than 7 mg CO ₂ -C / g organic matter / day; (b) No more than 8 mg CO ₂ -C / g organic carbon / day; or (c) A minimum Solvita maturity index of 5. | Facility-wide |
| 12. | The carbon to nitrogen (C:N) ratio of incoming feedstocks (mass basis) must be at least 25:1 as incorporated into the active compost pile. The carbon to nitrogen ratio may be measured directly using TMECC Method 05.02-A or an equivalent method approved by SWCAA, or by calculating the resulting carbon to nitrogen ratio in the compost mixture using a reference carbon to nitrogen ratio of each feedstock. | Facility-wide |
| 13. | Each compost pile must remain covered with a 12" biofilter layer of one or a combination of the following during active composting. (a) Compost with a Solvita index greater than 5 or equivalent; (b) Four inch minus screened overs; or (c) Four inch minus ground woody material. | 1 |
| 14. | The moisture content of the mixed active compost must not exceed 70% by weight as determined using TMECC Method 03.09-A or an equivalent method approved by SWCAA. | Facility-wide |
| 15. | Each compost pile must be made of feedstocks that are adequately mixed so that proper composting parameters (e.g., moisture content, carbon to nitrogen ratio, etc.) are maintained throughout the pile. The pile does not need to be built from the same feedstocks along its length. SWCAA may require measuring of composting parameters (moisture, O ₂ content of free air space, carbon to nitrogen ratio) in a specific area of a compost pile if SWCAA believes that area to be inadequately mixed. | Facility-wide |
| 16. | If nuisance odors are identified from the permittee's facility, the permittee must implement a Progressive Odor Management Plan in accordance with Appendix B of this Permit. SWCAA may require additional measures consistent with SWCAA 400-040(4) in the event that the Progressive Odor Management Plan fails to adequately address odor impacts. Implementation of the corrective actions identified in the Progressive Odor Management Plan does not shield the permittee from enforcement actions by SWCAA. | Facility-wide |
| 17. | The facility must not process more than 180,000 tons of compost feedstock in a year. | 1 |

| Req. No. | Operating Limits and Requirements | Equipment/ Activity ID No. |
|-----------------|--|---------------------------------------|
| 18. | <p>Oxygen concentrations within piles of active compost must be maintained no less than 5.0% by volume. If the results of oxygen sampling indicate the oxygen content in an area is less than 5.0% by volume, the permittee must take immediate corrective action to increase the oxygen content of the pile. Corrective action may include turning the pile, adding bulking material, or adding or modifying aeration systems. Each area where oxygen was measured below 5.0% must be monitored daily for the next 3 days to ensure that corrective action has been effective. Initiation of corrective action does not shield the permittee from enforcement actions by SWCAA.</p> <p>Because even a well-managed compost pile can have anaerobic pockets, for the purposes of this requirement, this requirement is violated if more than 5% of the samples indicate an oxygen concentration of less than 5.0% by volume.</p> | Facility-wide |
| 19. | <p>The facility is approved to compost green waste (organic waste) and up to 20% food waste by mass (annual average). Utilizing a material other than green waste or 20% food waste as feedstock is prohibited without prior written approval from SWCAA. With the exception of incidental amounts in post-consumer food waste, the facility must not process or receive fish, seafood, meat products, meat byproducts, or feathers without prior written approval from SWCAA. SWCAA may approve future acceptance of a specific feedstock if the results from a pre-approved program of experimentation and other documentation indicate that the feedstock can be handled at the permittee's facility without causing an unreasonable nuisance odor, causing emissions of a pollutant not previously emitted, or violating any term of this ADP.</p> | Facility-wide |
| 20. | <p>The aeration ponds must be maintained aerobic to minimize the generation of odorous emissions. The concentration of dissolved oxygen in the aeration ponds must be at least 1 part per million (1 mg/L).</p> | 3 |
| 21. | <p>Each operating day the permittee must scrape, or sweep clean all processing areas that have had active compostable materials spilled on them.</p> | Facility-wide |
| 22. | <p>The composting facility must be managed such that water that has come in contact with green waste or actively composting material does not pond except in the aeration ponds.</p> | Facility-wide |
| 23. | <p>The active compost pile height must not exceed 10 feet.</p> | 1 |
| 24. | <p>Wet suppression must be provided as necessary to control fugitive dust from material handling equipment, wood grinding, screening activities, storage piles, processing areas, and haul roads in the event that process changes, dry weather, or other conditions result in insufficient water application to control fugitive dust. Wet suppression may include wetting materials prior to handling, grinding, chipping, and screening activities to prevent dust generation, or the use of high-pressure (i.e. ≥ 80 psig) or sonic fogging nozzles at the point of dust generation.</p> | Facility-wide |

| Req. No. | Operating Limits and Requirements | Equipment/ Activity ID No. |
|-----------------|--|-----------------------------------|
| 25. | The biofilter media must be maintained moist at all times. If necessary, water must be added to the air stream entering the biofilter or through the use of an above ground sprinkling system. | 1 |
| 26. | The growth of large plants in the biofilter must be controlled to prevent channeling caused by plant roots. | 1 |
| 27. | <p>Putrescible materials must not be stored or stockpiled on site. For the purposes of this requirement, composted materials and wood waste (including tree stumps) are not putrescible materials. Green waste other than wood waste, and uncomposted manure are examples of feedstocks that may not be stored or stockpiled on site.</p> <p>With the exception of green waste that is primarily composed of woody materials (e.g., bare tree limbs and stumps) or leaves, green waste must be incorporated into compost piles the same day it is received unless circumstances beyond the control of the Permittee (such as an equipment breakdown or truck schedule delay) cause a delay.</p> <p>Food waste must be incorporated into compost piles as soon as possible but no later than the end of the same day it is received unless circumstances beyond the control of the Permittee (such as an equipment breakdown or truck schedule delay) cause a delay.</p> <p>If a delay occurs then the Permittee must:</p> <ul style="list-style-type: none"> (a) Mix or cover the green waste or food waste pile thoroughly with compost with a Solvita index greater than five, four inch minus screened overs, four inch minus ground woody material or bark, or sawdust the same day it is received; and (b) Remove the green waste or food waste from the site by the end of the next day or fully incorporate the green waste or food waste into compost piles within 72 hours. | Facility-wide |

Monitoring and Recordkeeping Requirements

| Req. No. | Monitoring and Recordkeeping Requirements | Equipment/ Activity ID No. |
|-----------------|--|-----------------------------------|
| 28. | With the exception of data logged by a computerized data acquisition system, each record required by this ADP must include the date and the name of the person making the record entry, at minimum. If a control device or process is not operating, a record must be made to that effect. | Facility-wide |
| 29. | All records required by this ADP must be kept for a minimum period of no less than three (3) years and must be maintained in a form readily available for inspection by SWCAA representatives. | Facility-wide |
| 30. | Excess emissions and upset conditions must be recorded for each occurrence. | Facility-wide |

| Req. No. | Monitoring and Recordkeeping Requirements | Equipment/ Activity ID No. |
|----------|--|----------------------------|
| 31. | <p>The following monitoring must be conducted to ensure adequate aeration of the active composting piles:</p> <ul style="list-style-type: none"> (a) The oxygen content and temperature of the active composting piles must be determined and recorded at least once per week for the first four weeks of continuous operation to confirm the aeration system and settings are providing adequate oxygenation to the piles. This testing must be repeated any time there is a physical or operational change to the aeration system. Oxygen and temperature measurements must be taken from at least three representative locations from each composting pile. Oxygen samples must be collected at the time period when the lowest oxygen concentration would be expected (e.g., at the end of a period when the blower has not been operating, if applicable); (b) The temperature of active compost piles must be monitored continuously and recorded at least hourly; and (c) Any faults or failures of the aeration system must be recorded automatically and the total amount of time the system was malfunctioning or offline must be recorded at least hourly. | Facility-wide |
| 32. | The CO ₂ evolution rate of the first fifteen piles moved off aeration must be determined using a standardized test. This testing must be repeated any time there is a physical or operational change to the aeration system or the period of active aeration is reduced. Thereafter, the CO ₂ evolution rate must be measured for at least five piles moved off aeration every three months. For the purposes of this requirement, the use of a Solvita test (e.g., TMECC Method 05.08-E) is acceptable. | Facility-wide |
| 33. | The type and amount of each type of material incorporated into each active composting pile must be recorded for each day of operation. | Facility-wide |
| 34. | The carbon to nitrogen ratio of a representative sample of initial compost mix, as incorporated into the primary composting pile, must be estimated and recorded prior to building each primary compost pile. The carbon to nitrogen ratio may be measured directly using TMECC Method 05.02-A or an equivalent method approved by SWCAA, or by calculating the resulting carbon to nitrogen ratio in the compost mixture using a reference carbon to nitrogen ratio of each feedstock. | Facility-wide |
| 35. | The moisture content of the initial feedstock mix must be determined prior to building the active compost piles. At least one moisture sample each month must be analyzed using TMECC Method 03.09-A or an equivalent on-site oven drying method approved by SWCAA. The moisture content of the remaining samples may be estimated by comparing the apparent moisture liberated by squeezing the reference sample and the remaining samples while wearing a protective glove. | Facility-wide |
| 36. | At a minimum, the oxygen concentration at four points in the aeration ponds must be determined and recorded once per week when the pond depth is at least 6 inches. The sampling points must be representatively spaced and measured at a depth of at least 18 inches or within 4 inches of the bottom of the ponds, whichever is closer to the surface. Sampling may occur at the circumference of the ponds. | 3 |

| Req. No. | Monitoring and Recordkeeping Requirements | Equipment/ Activity ID No. |
|-----------------|--|-----------------------------------|
| 37. | All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence. | Facility-wide |
| 38. | The Permittee must perform monthly inspections of the compost aeration system, biofilter collection system, and biofilter. The biofilter collection system must be inspected for leaks or impaired collection efficiency as evidenced by visible leaks, excessive odors, etc. The biofilter must be inspected for proper operation including soil moisture, plant growth, and damaged components. Any instance of noticeable odor greater than 10 feet from the biofilter must be investigated. All pollution control equipment failures that have the potential to cause excess emissions must be resolved as soon as possible and notification made to SWCAA within 24 hours. All inspections and corrective action initiated in response to the inspections must be recorded in an Operation and Maintenance log for periodic inspection by SWCAA. | 1 |
| 39. | <p>The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection:</p> <ul style="list-style-type: none"> (a) Upset conditions and excess emissions must be recorded for each occurrence; (b) The amount and type of compost processed must be recorded weekly; (c) The temperature of the aerated composting media must be recorded hourly; (d) The oxygen content of the compost and aeration ponds must be recorded weekly when the pond depth is at least six inches; (e) For any period in which the pond aeration system is not operating, the start and end time must be recorded; (f) The moisture content, and pH of the composting media must be measured monthly; (g) Maintenance and repair activities that may affect the emissions of air pollutants, must be recorded for each occurrence; and (h) The pressure drop across each biofilter must be recorded once per week during weeks in which the biofilters are operating. | Facility-wide |

Emission Monitoring and Testing Requirements

| Req. No. | Emission Monitoring and Testing Requirements | Equipment/ Activity ID No. |
|-----------------|---|-----------------------------------|
| 40. | The Reversing Aerated Composting System must be emission tested by the end of October in the calendar year following initial operation. Subsequent emission testing must be conducted by the end of October every five years in accordance with Appendix A. | 1 |

Reporting Requirements

| Req. No. | Reporting Requirements | Equipment/ Activity ID No. |
|-----------------|--|-----------------------------------|
| 41. | Excess emissions must be reported to SWCAA as follows: (a) As soon as possible, but no later than twelve (12) hours after discovery for emissions that represent a potential threat to human health or safety; (b) As soon as possible, but no later than forty-eight (48) hours after discovery for emissions which the Permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and (c) No later than thirty (30) calendar days after the end of the month of discovery for all other excess emissions. | Facility-wide |
| 42. | Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered. | Facility-wide |
| 43. | An annual emissions inventory report must be submitted to SWCAA by March 15 for emissions from the previous calendar year in accordance with SWCAA 400-105(1). Each report must contain, at a minimum, the following information: (a) The annual sum of emissions of VOC, PM, PM ₁₀ , PM _{2.5} , TAPs, and HAPs; and (b) The total quantity of each feedstock that was composted. | Facility-wide |
| 44. | The results of all emission testing required by this ADP must be reported to SWCAA in writing within forty-five (45) calendar days of test completion. | 1 |
| 45. | If the Progressive Odor Management Plan (Appendix B) is implemented in response to nuisance odors, the reports required by the Progressive Odor Management Plan must be submitted to SWCAA as required by Appendix B. | Facility-wide |
| 46. | The permittee must notify SWCAA in writing within ten (10) days after initial receipt of green waste. This will allow proper inspections and observations to be conducted for the new facility. | Facility-wide |

3. General Provisions

| Req. No. | General Provisions |
|-----------------|---|
| A. | For the purpose of ensuring compliance with this ADP, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the Permittee's premises and the facilities being constructed, owned, operated and/or maintained by the Permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this ADP and applicable regulations and to perform or require such tests as may be deemed necessary. |
| B. | The provisions, terms, and conditions of this ADP bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee. |
| C. | The requirements of this ADP survive any transfer of ownership of the source or any portion thereof. |
| D. | This ADP must be posted conspicuously at or be readily available near the source. |

| Req. No. | General Provisions |
|----------|---|
| E. | This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction is not completed within a reasonable time. |
| F. | This ADP does not supersede requirements of other agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction. |
| G. | Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70A.15, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply. |
| H. | If any provision of this ADP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable. |
| I. | No change in this ADP will be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the Permittee for the relief sought. |
| J. | The Southwest Clean Air Agency may, in accordance with RCW 70A.15, impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act. |
| K. | For the purposes of establishing if a condition of this ADP/NEP has been violated or is being violated, nothing in this ADP/NEP precludes the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed. |

Appendix A

Emission Testing Requirements Reversing Aerated Composting System

1. Background

The purpose of this testing is to quantify emissions from the Reversing Aerated Composting System and to provide an adequate assurance of compliance with the terms and conditions of this ADP.

2. Test Constituents and Test Methods

| <u>Constituent</u> | <u>Reference Test Method</u> | <u>Minimum Test Run Duration</u> |
|---|--|--|
| Sample collection | Flux Chamber (positive aeration mode only) | N/A |
| Volumetric flow rate | EPA Method 1 | N/A |
| Gas velocity, temperature | EPA Method 2 | N/A |
| Oxygen (O ₂), carbon dioxide (CO ₂) | EPA Method 3A | 30 minutes |
| Moisture Content | EPA Method 4 or psychometric chart | 30 minutes |
| Volatile organic compounds (VOCs) | EPA Method 25A | 30 minutes |
| Speciated HAPs | EPA Method TO-15 | 30 minutes |
| Ammonia | BAAQMD ST-1B | 30 minutes |

3. Test Plan and Notification

A comprehensive test plan must be submitted to SWCAA for review and approval a minimum of ten (10) business days prior to the proposed test date. SWCAA must be notified a minimum of three (3) business days prior to the proposed test date so that a SWCAA representative may be present during testing.

4. Test Requirements

(a) Test Dates.

- (1) Reversing Aerated Composting System: Testing must be completed by the end of October in the calendar year following initial operation.

Subsequent emission testing must be conducted by the end of October every five years following the initial test.

(b) Test Duration. Tests must include a minimum of three (3) test runs, each at least thirty minutes in duration.

(c) Test Location. Testing must be completed at each of the following locations:

- (1) Two representative locations at the biofilter outlet (negative aeration).
- (2) The biofilter inlet (negative aeration).
- (3) Two representative locations of the 12" biofiltration layer (positive aeration).

(d) Source Operations. Source operations during the emissions test must be representative of the maximum intended level of operation. Inability to achieve maximum level of intended operation must be preapproved by SWCAA in advance of performing the test.

Appendix A

Emission Testing Requirements

Reversing Aerated Composting System

- (e) Test Records. A complete record of operation related parameters, including process startups and shutdowns, control equipment startups and shutdowns, and any adjustments made during testing must be kept during emissions testing to correlate operations with emissions and must be recorded in the test results final report. The following production-related parameters must be included in the report:
- 1) Temperature measurements collected
 - 2) For each compost feedstock in the pile(s) being tested, the date and time each feedstock was added to the pile(s) and the amount of each feedstock added each time.
 - 3) Compost pH
 - 4) Compost carbon to nitrogen ratio
 - 5) Compost moisture
 - 6) Oxygen concentration within the compost pile (measured in at least three representative locations)
 - 7) The amount of compost being processed

5. Reporting Requirements

Unless otherwise directed by SWCAA, a final test report must be prepared and submitted in a format suitable to SWCAA within forty-five (45) calendar days of test completion and, at a minimum, must contain the following information:

- (a) A brief description of the purpose of the test, for example, an initial test, a periodic test required by an ADP, a test required by a federal, state, or local rule or regulation, or a test required to determine compliance with a Notice to Correct;
- (b) Description of the equipment or process being tested, including manufacturer, model number, serial number, and design capacity of the equipment;
- (c) The location and description of the discharge point (stack, port, etc.), including the dimensions (diameter, length and width, or other) and height above ground level. A photo of the discharge point is highly recommended;
- (d) The location of the sample ports or test location and a description of how the sampling location relates to the discharge point. For example, the sampling location may be in a square duct some distance away from the discharge point, which is a round stack. A photo of the sample ports or test location is highly recommended;
- (e) Time and date of the test and identification and qualifications of the personnel involved;
- (f) Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit;
- (g) Test results must be reported in:
 - (1) ppmv, dry, with no correction for O₂; and
 - (2) pound per hour (lb/hr);
- (h) Summary of air pollution control systems or equipment operating conditions during the test;
- (i) Summary of production related parameters, including at a minimum the parameters identified in Section 4 above;
- (j) A description of the test methods or procedures used, including all field data, quality assurance/quality control procedures and documentation;

Appendix A
Emission Testing Requirements
Reversing Aerated Composting System

- (k) A description of the analytical procedures used, including all laboratory data, quality assurance/quality control procedures and documentation;
- (l) Copies of field data and example calculations;
- (m) Chain of custody information;
- (n) Calibration documentation;
- (o) Discussion of any abnormalities associated with the results; and
- (p) A statement signed by the senior management official of the testing firm certifying the validity of the source test report. Reports with material mistakes or misinformation may be rejected by SWCAA.

6. Changes to Testing Requirements

The source test must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.

Appendix B

Progressive Odor Management Plan

1. Background

The purpose of the Progressive Odor Management Plan (POMP) is to address odor impacts of the permittee's facility on neighboring properties. The POMP consists of four levels of corrective action and response to odor nuisances. The POMP does not supersede the requirements in SWCAA 400-040(4) regarding odor, but rather provides a separate regulatory mechanism to assure that odor nuisances are addressed in a timely manner.

2. Identification of Nuisance Odor Problems

Nuisance odors can be identified by the permittee or SWCAA. To be considered a nuisance, odor complaints from neighboring property owners must be verified by the permittee or SWCAA.

3. Response to Nuisance Odor Problems

Level One

Each of the operational aspects that impact odor generation and control will be evaluated by operating personnel as to their contribution to the offensive odor. The primary odor generating operating condition will be corrected or adjusted using existing process management tools to minimize odor generation. The adjustments will be made as quickly as functionally possible. Corrective action must be initiated immediately but no later than 24 hours after the problem is identified. Level One corrective action must take precedence over other facility operations. If corrective actions require that parts or materials be ordered, the parts or material orders must be expedited if expediting the order will speed resolution of the odor nuisance.

Level Two

If the odor nuisance persists after the operators state that all conditions have been checked and are working appropriately, the permittee must evaluate the odors and the operational factors affecting odor generation and propose new procedures or handling methods with existing process management tools. The proposal must be submitted in writing to SWCAA within five working days after completion of Level One activities and identification of a continuing odor nuisance by the permittee or SWCAA. If SWCAA does not disapprove of the plan within five working days of receipt, the permittee must immediately begin implementation of the proposed new procedures or handling methods at the end of the five working day review period. If SWCAA disapproves of the proposed new procedures or handling methods, SWCAA may require that the plan be modified, or a new plan be submitted. Level Two corrective action must take precedence over other facility operations.

Level Three

If the odor nuisance persists after the completion of Level Two corrective action, and is attributed to specific materials, those materials must no longer be handled at the facility except for incidental amounts for experimentation. Future acceptance of these materials will be subject to New Source Review and approval by SWCAA.

Appendix B

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Level Four

If the odor nuisance persists after all Level One through Level Three options have been exhausted, the permittee must:

- (a) Commission a third-party to observe operations, document and propose process modification options, as well as perform air sampling and evaluation. The evaluation can be done through air odorant chemical sampling, professional odor panels or a local four-part odor panel. The panel would be used to characterize and quantify the odors. If necessary, odor dispersion modeling will be used to project the effectiveness of proposed facility or technology changes.
- (b) Submit the third-party's report to SWCAA within 60 days of initiating Level Four corrective action.
- (c) If persistent nuisance odors are attributed to the lack of, or adequacy of, structures, equipment, or air treatment methods, physical changes must be made to the permittee's facility. Depending on the changes required, New Source Review or other pre-construction permitting may be required prior to making the proposed change. A schedule for implementing these changes must be developed with SWCAA, allowing for normal permitting and construction timelines. The construction must progress as quickly as reasonably possible. Once changes are fully implemented, the permittee must evaluate the effectiveness of the changes and summarize the results of the evaluation in a report to SWCAA.

4. Progress Reports

In addition to the third-party evaluation report required with a Level Four corrective action, the permittee must submit the following reports to SWCAA:

- (a) A report on the progress of any on-going Level One through Level Four corrective actions at least once every five working days until the corrective action is completed.
- (b) A report on the actions taken and an evaluation of the effectiveness of those actions at the completion of any Level One through Level Four corrective action.