



December 12, 2017

Mr. Ben Holscher
H & H Wood Recyclers
PO Box 820526
8401 NE 117th Avenue
Vancouver, WA 98682

Subject: Final Air Discharge Permit / Nonroad Engine Permit for Additional Grinding, Chipping and Screening Equipment

Dear Mr. Holscher:

A final determination to issue Air Discharge Permit 17-3257 has been completed for Air Discharge Permit Application CL-3010 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for Air Discharge Permit Application CL-3010 was published on SWCAA's internet website on March 30, 2017. 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 Air Discharge Permit 17-3257 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.org/permits/adpfinal.asp>). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within 30 days of receipt as provided in RCW 43.21B.

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

Sincerely,

Uri Papish
Executive Director

UP: cl
Enclosures




SOUTHWEST CLEAN AIR AGENCY

**AIR DISCHARGE PERMIT / NONROAD ENGINE PERMIT
SWCAA 17-3257**

Issued: December 12, 2017

Facility Name: H & H Wood Recyclers
Physical Location: 8401 NE 117th Avenue,
Vancouver, WA 98682

SWCAA ID: 2351

REVIEWED BY: 
Paul T. Mairose, Chief Engineer



APPROVED BY: 
Uri Papish, Executive Director

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1. Equipment/Activity Identification	1
2. Approval Conditions	2
2.1 Emission Limits	2
2.2 Operating Limits and Requirements	3
2.3 Monitoring and Recordkeeping Requirements	5
2.4 Emission Monitoring and Testing Requirements	6
2.5 Reporting Requirements	7
3. General Provisions	7
Appendix A Source Emission Testing Requirements	
Appendix B Progressive Odor Management Plan	

1. Equipment/Activity Identification

ID No.	Generating Equipment/Activity	# of Units	Control Measures	# of Units
1	Composting	1	Aeration system, POMP	1
2	Fugitive Dust Sources	N/A	Wet suppression	N/A
3	Leachate Holding Tank	1	Aeration system	1
4	Tub Grinder H-13	1	Wet suppression as necessary	N/A
5	Track Screen H-24	1	Wet suppression as necessary	N/A
6	Peterson 5710 (track-mounted horizontal wood grinder)	1	Wet suppression as necessary	N/A
7	1996 Morbark DE Barker	1	Wet suppression as necessary	N/A
8	1995 Peterson DDC 5000G Chipper	1	Wet suppression as necessary	N/A
9	1995 Morbark 27 Chipper	1	Wet suppression as necessary	N/A
10	2008 Peterson 4710B Grinder	1	Wet suppression as necessary	N/A
11	2005 Peterson 4700B Grinder	1	Wet suppression as necessary	N/A
12	1997 Diamond Z 110 Grinder	1	Wet suppression as necessary	N/A
13	2014 Vermeer HG6000 Grinder	1	Wet suppression as necessary	N/A
14	1995 CEC 5x12 Screen	1	Wet suppression as necessary	N/A
15	2006 CEC 6x16 Screen	1	Wet suppression as necessary	N/A
16	Tub Grinder H-13 Engine (nonroad engine)	1	Ultra-low sulfur diesel	N/A
17	Track Screen H-24 Engine (nonroad engine)	1	EPA Tier 1 Ultra-low sulfur diesel	N/A
18	Peterson 5710 Engine (nonroad engine)	1	EPA Tier 2 Ultra-low sulfur diesel	N/A
19	1996 Morbark DE Barker Engine (nonroad engine)	1	Ultra-low sulfur diesel	N/A
20	1995 Peterson DDC 5000G Chipper Engine (nonroad engine)	1	Ultra-low sulfur diesel	N/A
21	1995 Morbark 27 Chipper Engine (nonroad engine)	1	Ultra-low sulfur diesel	N/A
22	2008 Peterson 4710B Grinder Engine (nonroad engine)	1	EPA Tier 2 Ultra-low sulfur diesel	N/A
23	2005 Peterson 4700B Grinder Engine (nonroad engine)	1	EPA Tier 2 Ultra-low sulfur diesel	N/A

ID No.	Generating Equipment/Activity	# of Units	Control Measures	# of Units
24	1997 Diamond Z 110 Grinder Engine (nonroad engine)	1	Ultra-low sulfur diesel	N/A
25	2014 Vermeer HG6000 Grinder Engine (nonroad engine)	1	EPA Tier 4i Ultra-low sulfur diesel	N/A
26	1995 CEC 5x12 Screen Engine (nonroad engine)	1	Ultra-low sulfur diesel	N/A
27	2006 CEC 6x16 Screen Engine (nonroad engine)	1	EPA Tier 1 Ultra-low sulfur diesel	N/A

2. Approval Conditions

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

Air Discharge Permit 11-2966 is superseded in its entirety by this Air Discharge Permit.

2.1 Emission Limits

No.	Emission Limits	Equipment/Activity
1.	Emissions of toxic air pollutants must not exceed their respective small quantity emission rates listed in Washington Administrative Code 173-460 as in effect February 14, 1994.	Facilitywide
2.	Emissions of volatile organic compounds from compost operations must not exceed any of the following: (a) 1.43 pounds per ton incoming material (short-term limit) (b) 8.57 tons per year (12-month rolling total) Annual emissions must be calculated using the emission factor presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.	1
3.	Emissions of ammonia from compost operations must not exceed any of the following: (a) 0.20 pounds per ton incoming material (short-term limit) (b) 1.20 tons per year (12-month rolling total) Annual emissions must be calculated using the emission factor presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.	1

No.	Emission Limits	Equipment/ Activity
4.	With the exception of emissions from diesel engines, visible emissions from the approved operations must not exceed zero percent opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1 - 15
5.	Visible emissions from the nonroad diesel-fired engines must not exceed five percent opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400) except during startup. For the purposes of this requirement, the startup period ends when the earlier of the following operating events occurs: (a) The engine has reached normal operating temperature; or (b) The engine has been operating for 15 minutes.	16 - 27

2.2 Operating Limits and Requirements

No.	Operating Limits and Requirements	Equipment/ Activity
6.	No more than 12,000 tons of material may be composted per year.	1
7.	A 6" thick layer of finished compost must be used to cover the compost pile during active composting.	1
8.	Oxygen concentrations within piles of newly received materials and 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 assure that corrective action has been effective. Initiation of corrective action does not shield the permittee from enforcement actions by SWCAA. 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.	1
9.	Only mature, stable compost or other materials may be added to the curing or finishing piles. For the purposes of this requirement, mature and stable compost is compost with a carbon dioxide evolution rate of 6 mg CO ₂ -C / g C / day or less.	1
10.	The carbon to nitrogen 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 the known carbon to nitrogen ratio of each feedstock.	1
11.	The moisture content of the mixed active compost must not exceed 60% by weight as determined using TMECC Method 03.09-A or an equivalent method approved by SWCAA.	1

No.	Operating Limits and Requirements	Equipment/ Activity
12.	<p>Putrescible materials must not be stored or stockpiled on site. For the purposes of this requirement, composted materials and wood waste are not putrescible materials. Green waste other than wood waste, and uncomposted manure are examples of feedstocks that must not be stored or stockpiled on site. 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 removed from the site or incorporated into compost piles no later than the end of the calendar day after which it was received.</p> <p>Green waste received by dedicated waste hauling trucks must be removed from the site or 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. If a delay occurs then the Permittee must:</p> <ul style="list-style-type: none"> (a) Mix the green waste thoroughly with hogged fuel the same day it is received; and (b) Remove the green waste from the site by the end of the next day or incorporate the green waste into compost piles by the end of the next day. 	1
13.	<p>The facility is approved to compost green waste. Utilizing a material other than green waste as feedstock is prohibited without prior written approval from SWCAA. The facility must not process or receive fish, seafood, meat products, meat byproducts, feathers, or food waste 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 Permit.</p>	1
14.	<p>The leachate holding tank must be maintained aerobic to minimize the generation of odorous emissions. The concentration of dissolved oxygen in the leachate holding tank must be at least 4 parts per million (mg/L).</p>	3
15.	<p>The composting facility must be managed such that water that has come in contact with compost or composting material does not pond except in the actively managed leachate holding tank.</p>	1, 3
16.	<p>The permittee must inspect all aspects of the composting operations weekly to identify current or potential odor problems. When current or potential odor problems are identified, the permittee must take corrective action consistent with the Progressive Odor Management Plan (POMP) included in Appendix B.</p>	1, 3
17.	<p>If nuisance odors are identified from the permittee's facility, the permittee must implement the Progressive Odor Management Plan included as 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.</p>	1, 3
18.	<p>The nonroad diesel engines must only be fired on #2 diesel or better. The sulfur content of the fuel fired in the diesel engines must not exceed 0.0015% by weight (15 ppm). A fuel certification from the fuel supplier may be used to demonstrate compliance with this requirement.</p>	16 - 27

No.	Operating Limits and Requirements	Equipment/ Activity
19.	Use of emission units not identified in this Air Discharge Permit (e.g. engine powered grinders and screens) are not allowed without prior written approval from SWCAA.	Facilitywide
20.	Each day the permittee must scrape or sweep clean all processing areas that have had compostable materials spilled on them.	Facilitywide
21.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facilitywide
22.	Wet suppression must be provided as necessary to control fugitive dust from material handling equipment, wood grinding, wood chipping, screening activities, storage piles, and processing areas 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.	Facilitywide
23.	Reasonable precautions must be used to prevent fugitive dust from becoming airborne. Reasonable precautions include the use of adequate wet suppression or enclosure of the operations responsible for creating fugitive dust.	Facilitywide
24.	Emission units identified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	Facilitywide

2.3 Monitoring and Recordkeeping Requirements

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
25.	The oxygen content, pH, and temperature of the composting piles must be determined and recorded at least once per week. For oxygen, temperature, and pH sampling, measurements must be collected from at least six representative locations from each composting pile. Each oxygen sample must be collected from the area or depth of the pile where the lowest oxygen concentration would be expected. Oxygen samples must be collected at the time period when the lowest oxygen concentration would be expected (for example during the end of a period when a blower has not been operating).	1
26.	Prior to transferring material from a compost pile to a curing pile, the CO ₂ evolution rate of the material must be determined using a standardized test. Examples of standardized tests include Solvita's respiration test and Test Methods for the Examination of Composting and Compost, USDA and U.S. Composting Council (TMECC) method 5.08-B.	1
27.	The type and amount of each type of material incorporated into each active composting pile must be recorded for each pile.	1
28.	The amount of green waste received and shipped off-site must be recorded for each day of operation.	1

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
29.	The carbon to nitrogen ratio of a representative sample of initial compost mix, as incorporated into the primary composting pile, must be determined and recorded prior to building each primary compost pile. The carbon to nitrogen ratio may be determined by direct measurement 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 the known carbon to nitrogen ratio of each feedstock.	1
30.	The moisture content of each compost pile must be determined and recorded weekly. At least one moisture sample each week must be analyzed using TMECC Method 03.09-A, gravimetric analysis using a Koster Silage Dryer, or an equivalent 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. Moisture content must be reported as % moisture by mass.	1
31.	The oxygen concentration in the leachate holding tank must be determined and recorded at least once per week unless an aeration system is continuously operated in the leachate holding tank. SWCAA may require that the oxygen concentration be measured if the leachate appears to be the source of nuisance odors.	3
32.	The following information regarding the diesel engines must be collected, recorded at the intervals specified below, and readily available on-site for inspection: <ul style="list-style-type: none"> (a) The number of hours each nonroad diesel engine is operated must be recorded for each site and each calendar year; and (b) The fuel sulfur content of the diesel burned in the nonroad diesel engines must be determined and recorded for each fuel delivery. A fuel certification from the fuel supplier or test results using an appropriate method listed in 40 CFR 60.17 may be used to comply with this requirement. 	16 - 27
33.	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.	Facilitywide
34.	Each record required by this Air Discharge Permit must include the date and the name of the person making the record entry.	Facilitywide
35.	All records required by this Air Discharge Permit must be kept on site for a minimum period of no less than three years and must be available for inspection by SWCAA representatives.	Facilitywide

2.4 Emission Monitoring and Testing Requirements

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
36.	Source emissions testing of the composting process must be conducted in accordance with Appendix A within 45 days of a request by SWCAA. SWCAA may request a source test of the composting process if it is identified as a potential source of unacceptable nuisance odors or if such a test is deemed necessary to demonstrate compliance with the emission limits identified in this Air Discharge Permit.	1

2.5 Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
37.	Source emission test reports required by Appendix A must be submitted to SWCAA within 45 days of test completion.	1
38.	Reports required by the Progressive Odor Management Plan (Appendix B) must be submitted to SWCAA as required by Appendix B.	1, 3
39.	All air quality related complaints, including odor complaints, received by the permittee must be reported to SWCAA as soon as practicable, but no later than the next business day.	Facilitywide
40.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> (a) As soon as possible, but no later than 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 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 30 days after the end of the month of discovery for all other excess emissions. 	Facilitywide
41.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facilitywide
42.	<p>The following emission-related information must be reported to SWCAA by March 15th for the previous calendar year:</p> <ul style="list-style-type: none"> (a) The total quantity of each feedstock composted; (b) The total amount of green waste received; (c) The total number of hours each nonroad engine operated; and (d) Air emissions of criteria air pollutants, volatile organic compounds, hazardous air pollutants, and toxic air pollutants (TAPs). 	Facilitywide

3. General Provisions

No.	General Provisions
A.	The equipment specified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.
B.	For the purpose of ensuring compliance with this Permit, 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 Permit and applicable regulations and to perform or require such tests as may be deemed necessary.

No.	General Provisions
C.	The provisions, terms and conditions of this Permit shall be deemed to bind the permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the permittee.
D.	The requirements of this Permit shall survive any transfer of ownership of the source or any portion thereof.
E.	This Permit must be posted conspicuously at or be readily available near the source.
F.	Approval to construct or modify specific pollution generating equipment shall become invalid if construction is not commenced within eighteen months after the date of issuance of this Permit, if construction is discontinued for a period of eighteen months or more, or if construction is not completed within a reasonable time.
G.	This Permit does not supersede requirements of other Agencies with jurisdiction and further, this Permit does not relieve the permittee of any requirements of any other governmental Agency. In addition to this Permit, the permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
H.	Compliance with the terms of this Permit does not relieve the permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70.94, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
I.	If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit shall remain in effect and be enforceable.
J.	No change in this Permit shall 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.
K.	The Southwest Clean Air Agency may, in accordance with RCW 70.94 impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this Permit, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.

Appendix A
H & H Wood Recyclers
Emission Testing Requirements

1. Introduction:

- a. The purpose of this testing is to quantify emissions from active composting operations and to demonstrate compliance with the requirements of this Air Discharge Permit if requested by SWCAA.

2. Testing Requirements:

- a. The testing must be performed at three representative locations on the composting pile unless otherwise directed by SWCAA.
- b. A comprehensive test plan must be submitted to SWCAA for review and approval at least 10 days prior to testing.
- c. SWCAA must be notified of the test date at least 5 days prior to testing.
- d. At least three sampling runs (one at each location) must be conducted using the methods and test durations specified below.

<u>Constituent</u>	<u>Test Method or Equivalent¹</u>	<u>Minimum Test Duration</u>
Sample collection	Flux chamber	N/A
Gas flow rate, temperature	EPA Methods 1 and 2, 2A, or 2C	N/A
O ₂ , CO ₂ content	EPA Method 3, 3A	60 minutes
Stack gas moisture content	EPA Method 4 or psychometric chart	60 minutes
Ammonia	BAAQMD ST-1B ²	60 minutes
Volatile Organic Compounds	EPA Method TO-12, TO-14, 18 or 25A	60 minutes
Hydrogen sulfide	Evacuated canister, gas chromatograph	60 minutes
Dimethyl sulfide	Evacuated canister, gas chromatograph	60 minutes
Carbon disulfide	Evacuated canister, gas chromatograph	60 minutes
Methyl mercaptan	Evacuated canister, gas chromatograph	60 minutes

¹ The use of an alternate or equivalent test method must be pre-approved by SWCAA in writing.

² Bay Area (California) Air Quality Management District Source Test Method #1B.

3. Source Operation:

- a. A complete record of production related parameters including pile depth, temperature, bulk density, moisture content, carbon to nitrogen ratio, pH and initial compost mix must be generated for each test location and must be recorded in the final test report.
- b. Source operations during the emissions test must be representative of maximum intended operating conditions.

Appendix A
H & H Wood Recyclers
Emission Testing Requirements

4. Reporting Requirements:

The results of all required testing must be submitted to SWCAA within 45 days of test completion. Unless otherwise directed by SWCAA, a single hard copy of the report and an electronic copy (e.g. portable document format (.pdf)) of the report must be submitted. The report must include:

- a. A description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations.
- b. Time and date of the test and identification and qualifications of the personnel involved.
- c. A summary of results, reported in units and averaging periods consistent with the applicable emission standard or limit.
- d. A summary of control system or equipment operating conditions.
- e. A summary of production related parameters.
- f. A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation.
- g. A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation.
- h. Copies of field data and example calculations.
- i. Chain of custody information.
- j. Calibration documentation.
- k. Discussion of any abnormalities associated with the results.
- l. A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

Appendix B
H & H Wood Recyclers
Progressive Odor Management Plan

1. Introduction: 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: The permittee will take the following actions to address odor impacts until nuisance odors are reduced to a reasonable minimum as determined by SWCAA:

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 the existing process management tools to optimize the composting environment and controls (e.g. compost mixture, oxygen content, pile height, moisture content, bulk density, etc.). 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 shall 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 feedstocks, those feedstocks must no longer be accepted at the facility except for incidental amounts for experimentation. Future acceptance of these feedstocks will be subject to New Source Review and approval by SWCAA.

Appendix B
H & H Wood Recyclers
Progressive Odor Management Plan

Level Four

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

1. 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.
2. Submit the third-party's report to SWCAA within 60 days of initiating Level Four corrective action.
3. 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:

1. 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.
2. 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.