



To: Ron Junker, Cowlitz County Landfill

7/31/2017

Subject: Review of Cowlitz County Landfill’s Draft Air Discharge Permit

The new permit provided by the South West Clean Air Agency is very similar to the previous air discharge permit you’ve been operating under. Notable changes included increased emission limits for Hydrogen Chloride and Sulfur Dioxide, improved clarity for some of the language, and specific reference to Flare #2. This memo includes a list of comments and changes from the previous permit.

Comments and Changes from Previous Permit:

- The second flare is listed as Emission Unit ID #2
 - The emergency generator and leachate ponds were pushed to ID #s 3 and 4, respectively
- The requirement for calculating annual greenhouse gas emissions has been removed, as has the 95,000 tpy limit on greenhouse gas emissions.
- The emission limits for the flares have been updated to the following:

Pollutant	New limits*		Old Limits	
	Short Term Limit (1 hr average)	Annual Limit (tons per year)	Short Term Limit (1 hr average)	Annual Limit (tons per year)
Nitrogen Oxides	0.06 lb/MMbtu	15.3	0.06 lb/MMbtu	12.44
Carbon Monoxide	0.10 lb/MMbtu	25.5	0.10 lb/MMbtu	20.73
Volatile Organic Compounds	1.47 lb/hr	12.88	2.39 lb/hr	10.47
Sulfur Dioxide	4.44 lb/hr	38.88	1.44 lb/hr	6.31
Hydrogen Chloride	0.42 lb/hr	3.68	0.57 lb/hr	2.48

*Note that the new annual limits in the new permit are given for each flare. This table indicates the overall limit for both flares which is how the limits were presented in the old permit.

- Toxic air pollutant emission limits have also been updated per results from the air dispersion model
- Condition number 23 was modified to more closely match the regulation upon which it was based. It now reads “The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.”
- No changes were made to condition 25 or 26 which limit the amount of gypsum, poultry feathers, and paper mill sludge that can be accepted for placement.
- Not a change from the original permit, but worth noting: Flare #2 must be emission tested within 60 days of initial startup. Subsequent tests are to be conducted concurrently with the 5-year testing schedule of Flare #1. (see condition 42 for details)
- Excess emission reporting timeline was shortened from 48 hours to 12 hours for emissions that are a threat to human health and safety (condition 46).
- Reporting requirements related to air quality complaints have been updated (condition 48).
- The source testing requirements have been updated, seemingly for clarity (appendix A).

Conclusion:

After reviewing the permit, it would seem that the necessary changes have been made for you to operate the second flare and be able to meet SO2 and H2S emission limits more often. ESI does not see any need for further modification to the permit. We recommend contacting Clint Lamoreaux to confirm that the permit appears satisfactory and that you would like to move towards it being released. Please feel free to get in touch with any questions or concerns regarding the updated permit.

Regards,

A handwritten signature in black ink that reads "Ben Burke". The signature is written in a cursive style with a large, stylized "B" and "B".

Ben Burke

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