From: <u>Larry McCarter</u>
To: <u>Agata McIntyre</u>

Cc: Robert Mittendorf; Julia; Kim J Lund

Subject: RO-52 Comment: Demand Facility Wide Compliance w/ Accurate & Timely Testing.

Date: Wednesday, May 28, 2025 8:22:17 AM

Attachments: drive 2020q4 32dp.pnq

IMG 0392.jpeq IMG 0393.pnq IMG 0394.pnq IMG 0395.pnq

May 28, 2025

To: Agata McIntyre

North West Clean Air Agency

From: Larry McCarter 212 Hawthorn Road Bellingham, WA

Hello,

Summary: As proposed, RO-52 fails to insulate the City from the immediate application of the rigorous "New Source" ("NSR") regulations. In addition to needing this synthetic permit because of historically high CO emissions, Bellingham is subject to the NSR's for operating without an Air Permit or site specific monitoring plans. There must be one more condition inserted in this permit; The facility has to acquire and maintain an approved Air Operating Permit (or shutdown) while meeting the CO limits computed with the prescribed 7-day averages.

This Permit Must Include Obtaining All Approved Air Operating Permits

Any facility operating without approved air permits is subject to the <u>New Source Rules</u>. With or without the CO violation, Bellingham needs a Synthetic Minor permit to legally operate at all without adherence to the Permitting, testing requirements of either "LLL" or LLLL". <u>New Sources Regulations apply to facilities operating without permits</u>. Bellingham needs a synthetic minor permit to operate without monitoring plans. CO is another matter and not the only reason for a synthetic minor now. This permit and the AOP condition should have been demanded by the regulators years ago.

If the purpose of RO-52 is to forestall imposition of the rules for any New Source, the proposed "synthetic minor" conditions must describe and include <u>all</u> the other NSR triggering violations Bellingham has.

Post Point is subject to the NSR for more than just the CO violation; Operating out of compliance since 2016 automatically triggers application of the NSR. CO exceedence is only one of many equally triggering events such as no air permit.

Clean Water violations (also NSR triggering) are also occurring and those should be addressed in this permit as well.

The Many Ongoing Violations:

If the intent of the Synthetic Minor Permit is to address those things that trigger NSR, then this permit must address Bellingham's several violations that are triggering NSR namely, exceedance of the modification rule years ago, failure to submit an approvable monitoring plan, failure to obtain an approved air permit, or dispose of the process water properly all resulted in triggering the Federal Plan to require Post Point to now comply with NSR or shutdown.

The Synthetic Minor Permit can not ignore the many other high priority violations ("HPV") such as dirty "Process waters" are not being disposed of as a hazardous or special waste, or unaddressed Mercury, Dioxin and Furan testing requirements still unresolved, years after the EPA demanded changes.

RO-52 focuses non-sensically on only on one pollutant as if there were no other illegal discharges, emissions or actions occurring onsite, such as operating without a permit, not satisfactorily testing for dioxin, mercury or furans or monitoring plans are still not approved even though we only stack test a few times a year. Granting a partial permit is inappropriate without underlying permit approvals and sensors are all inplace and operating correctly.

Post Point is a "New Source": It is Not Just the CO Violations

Due to years of reported excessive polluting, the Post Point Facility became a New Source Generator. Because it is impossible for this facility to comply with the New Source rules, Bellingham is now avoiding a shutdown by applying for a synthetic minor. Public Health Safety now depends on the accuracy of the testing and timeliness of enforcement. The proposed testing will not be accurate nor timely.

HPV's must have no longer than 7-day block testing: Health and Safety Matters
Post Point is categorized as a High Priority Violator ("HPV") and is seeking a synthetic minor to operate as a compliant "new source" without needing to meet all of the other New Source expectations. HPV facilities must adhere to New Source testing protocols. The CO testing protocol and proposed 365 block of time does not comply with the CAA's 7-day maximum block of time to demonstrate compliance for any new source that is a HPV.

Here is an EPA policy document describing the obligations of Synthetic Minor recipients to adhere to and comply with the New Source for compliance: https://drive.google.com/file/d/1xh-sIYgBYAPA87IZTr86Fe-dxtvRfF8j/view?usp=drivesdk

Here is an EPA policy discussion on of 365-day rolling averages are appropriate only for determining applicability, not compliance (see last paragraph): https://drive.google.com/file/d/1HSrO9Frs-uvaRo91P5z7o0y8RvCIrRWk/view?usp=drivesdk

"New Sources" Must Use Best Testing Location: City's Dilution is not a Solution I just received a document prepared by the city designed to help people understand more detail regarding this permit.

On page 3 of this presentation is a note to route "conduit from the roof".

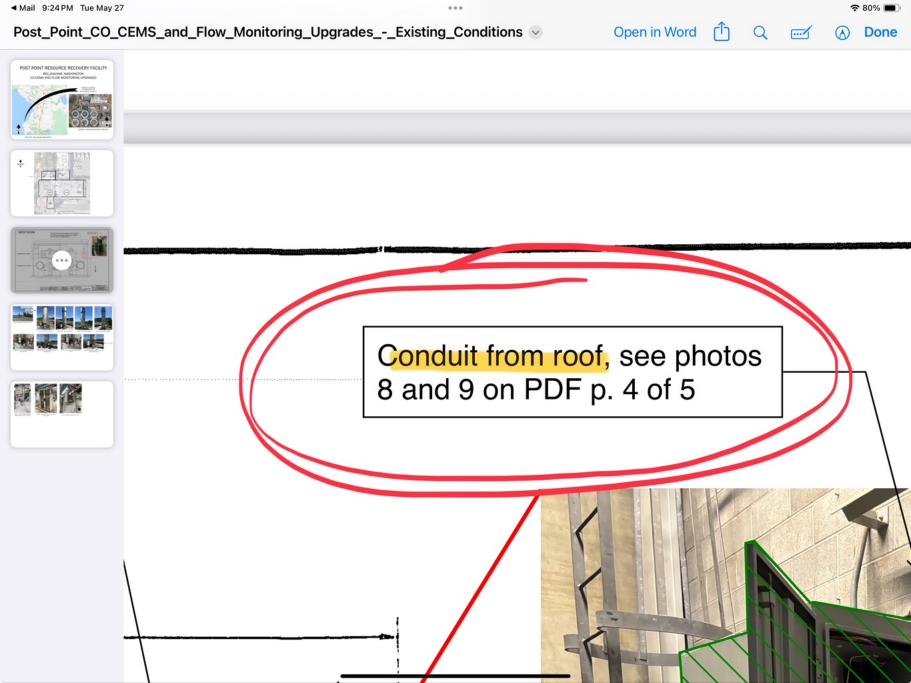
The incinerator is inside, so why not take the sample next to the incinerator?

I do not understand the placement of sensors on the roof, after the introduction of outside cooling air. The testing equipment is situated close to the CO source. Common sense dictates one should take the samples as near the source after turbulence subsides and before dilution with any outside air.

Improperly locating the sensors after dilution or not timely reacting to the continuously generated results for one year defeats the purpose of installing them and is unprotective of our public's health and welfare.



Sent From Larry's IPad.



■ Mail 9:24 PM Tue May 27

AREA MAP - BELLINGHAM WASHINGTON

Post_Point_CO_CEMS_and_Flow_Monitoring_Upgrades_-_Existing_Conditions













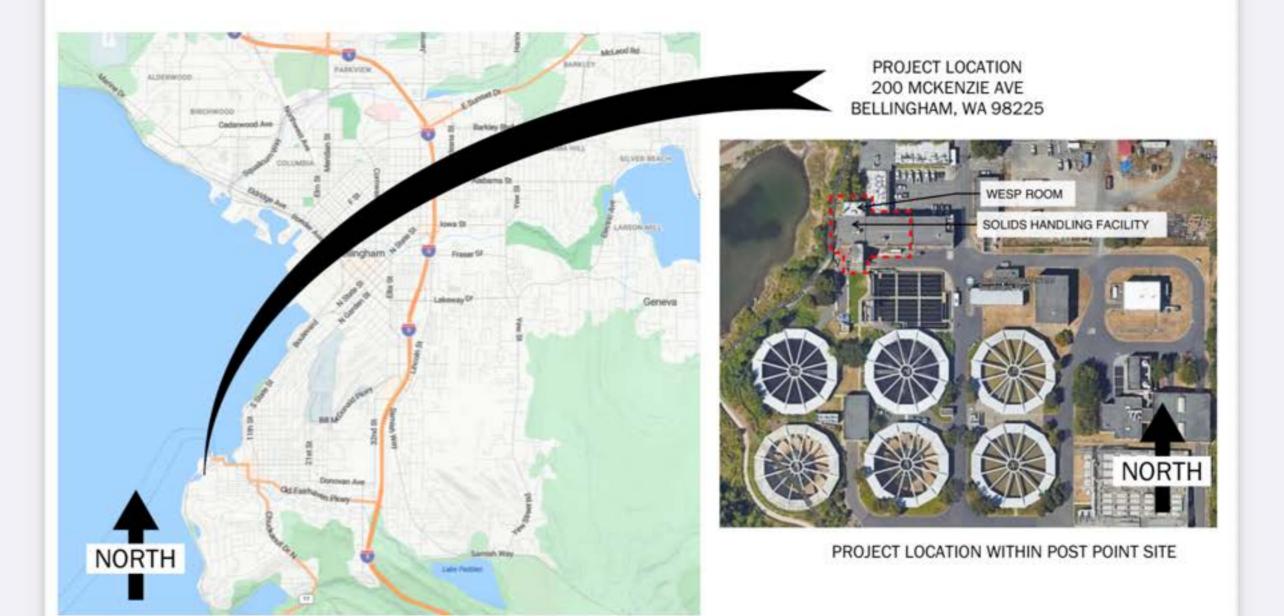


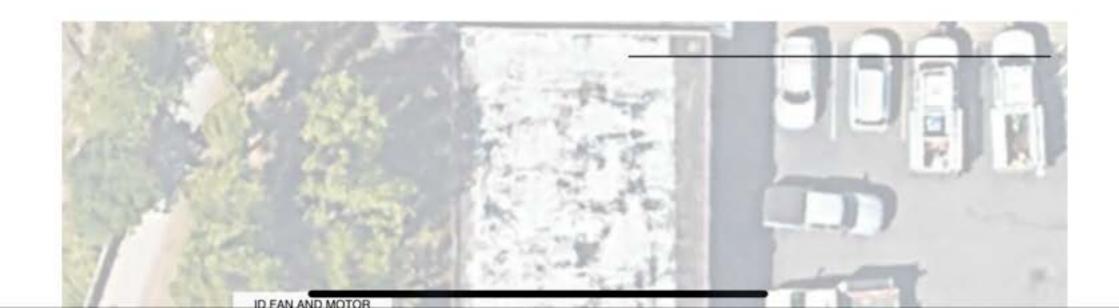


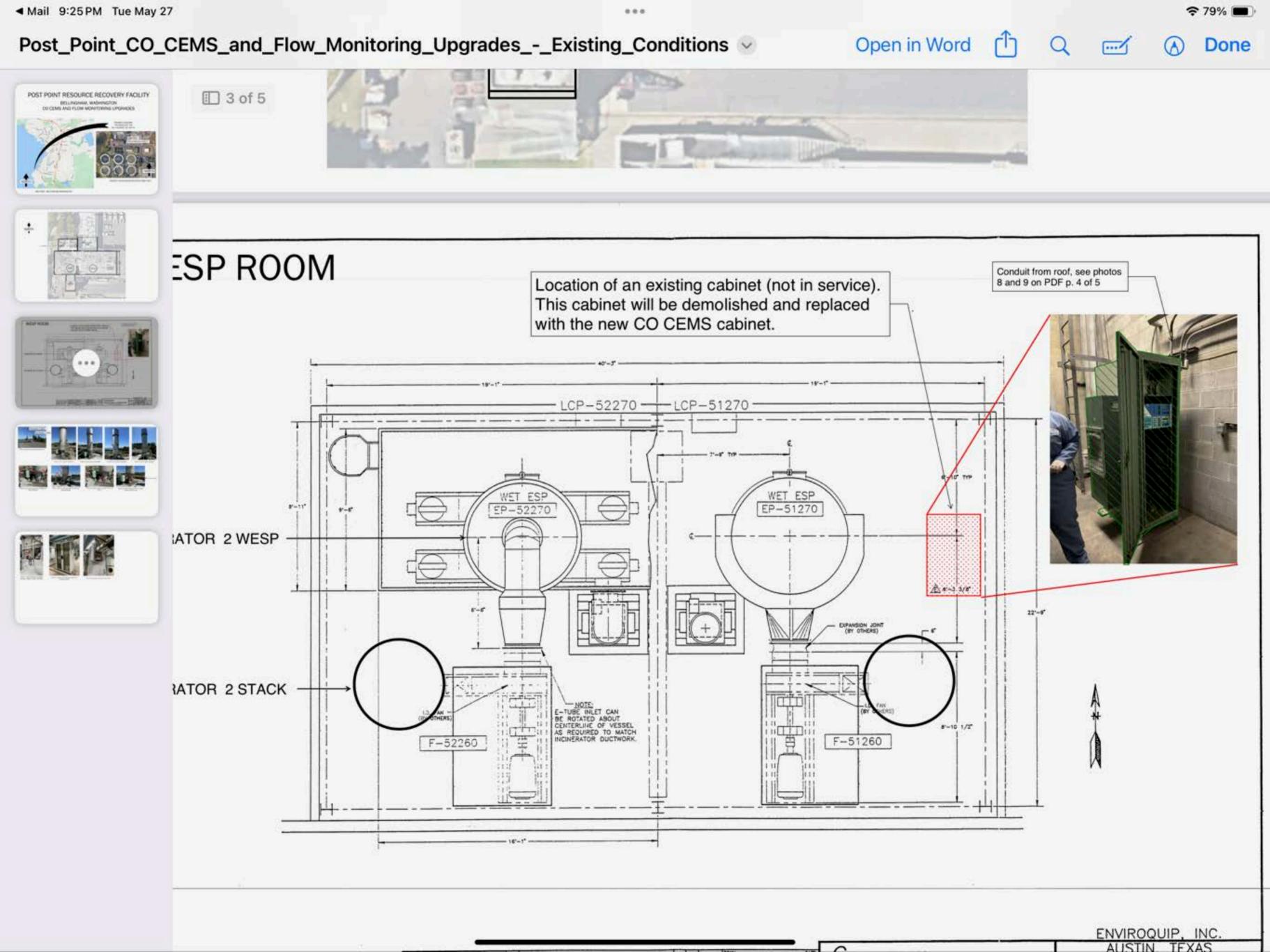


POST POINT RESOURCE RECOVERY FACILITY

BELLINGHAM, WASHINGTON
CO CEMS AND FLOW MONITORING UPGRADES







■ Mail 9:25 PM Tue May 27

Post_Point_CO_CEMS_and_Flow_Monitoring_Upgrades_-_Existing_Conditions

Open in Word















Photo 3: Crossover valving for THC CEMS

Agata McIntyre

From: Larry McCarter <rdslarry@mac.com>
Sent: Saturday, May 17, 2025 6:46 AM

To: Agata McIntyre

Subject: RO-52 Comment: Require Hourly Reporting on a Public Internet "Dashboard" coupled with Audible

Alarms for neighborhood's safety.

Purpose of Comment:

Everybody that breathes air in Whatcom, Skagit and San Juan County needs to know in real time when any, including CO deviations or "incidents" are occurring so they may choose to avoid being in the area during interruptions, deviations or exceedances.

Requested Permit Condition:

Bellingham must install and maintain on their webpage continuous access to a "Dashboard View" of continuous monitor's readings and results; This "Dashboard" should instantaneously show hourly readings and compute the rolling averages, revealing and predicting PSD avoidance based on emitting less than the 90TPY re-computing in real-time each and every 24 hour block of time. Audible Sirens Alarms Should be installed for any air quality incident including CO predicted exceedance.

Foundation for Comment: Incident #'s 14196 & 14197 (nobody knows about these).

Mid April, 2025 Post Point experienced several days of air pollution control failures. Apparently the Wet scrubber experienced a computer glitch and shutdown for days. I happened to be there on some of those days and took photos for a portion of the events. It is unclear to me if the incident reports match completely with the dates on my photos. I presume the photos I took were of what is called the "e-stack" in the open, or bypass position, but I am not sure.

I now believe what I was "seeing" was likely an "incident" where a malfunction caused the Wet Scrubber to fail and so the exhaust was re-directed to what is called the "e-stack" or I presume the straight, unscrubbed, exhaust stack in all of my photos attached below.

Records show "Incident reports" of 2 stack events that somewhat match the dates of my photos, but I have photos of 3 days (not just two days as reported) of this stack being open and used. Not knowing when these events occurs is the problem. Not knowing timely is the real problem in that Marine Park is adjacent as are other public facilities such as the Alaska Ferry. They should all be instantaneously alerted to potential exposures during any incident.

Conclusion:

Any neighbor should be instantaneously informed when the air controls such as the mercury scrubber fails and is inoperable, or in this case, when the CO is going to likely exceed our yearly limits. Integrating reporting with continuous online monitoring tools with alarms and notifications minimally, but effectively protects our communities and neighborhoods from the unavoidable exposures caused by upsets and deviations typical of 50 year old equipment with old controls.

Attachments: Four (4) photos dated April 14-17, 2025 Post Point E-stack open:

















Bellingham - Fa April 17 7:48





Bellingham - Fa

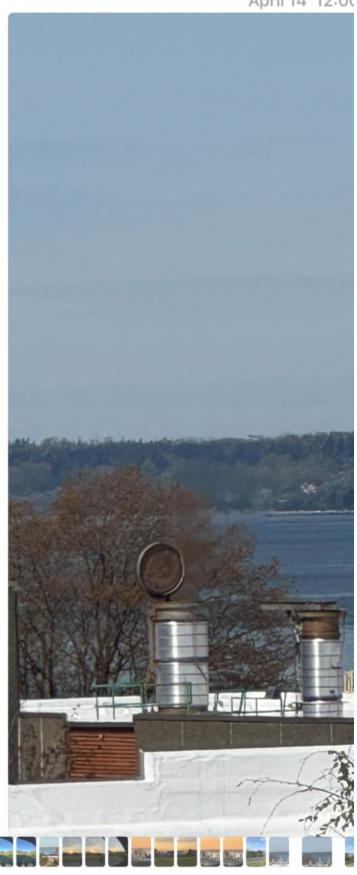
April 14 7:39



<

Bellingham - Fa

April 14 12:00



Sent From Larry's IPad. Begin forwarded message: From: Larry McCarter <rdslarry@mac.com> Date: April 14, 2025 at 10:56:17 PM PDT **To:** Toby Mahar <toby@nwcleanair.org> Cc: Agata McIntyre <agatam@nwcleanairwa.gov> Subject: Post Point Bypass Stack in Use all day today. Why? Hello, I happened to walk by the post point facility this morning and noticed that there was a lot of heat, maybe even trace smoke coming out of one of the bypass stacks. I thought to take a video of it this morning and then this evening I went back and I took a second video because it was open with high heat waves rising from the bypass stack. I don't know enough about the operation to complain or inform you of something going wrong, but it doesn't seem right that there's energy leaving the facility through some port other than the afterburners unless they are preheating the oven. Can you tell me why there appears to be more energy coming out of the bypass damper than the after burners, and why that would go on all day. Thank you.

Larry McCarter

360-739-4843

View my shared photos:
Today,
https://share.icloud.com/photos/0bbGdNfOOVZDqrx6N57cEO6lg
iCloud link available until May 15
Sent From Larry's IPad.

From: <u>Larry McCarter</u>
To: <u>Agata McIntyre</u>

Subject: RO-52 Comments Batch #3. L McCarter

Date: Friday, May 16, 2025 8:51:33 AM

Attachments: PO-52 Comments Batch #3.pdf

Hello,

Everyday I try to learn a little bit more about air-pollution, so now I have a few more comments, but buried in all of them is my belief a "NSR" is mandated for our facility and not because of the CO.

Larry McCarter

Sent From Larry's IPad.

To: Agata McIntyre NWCAA 1600 S 2nd Street Mount Vernon, WA

From: Larry McCarter 212 Hawthorn Road Bellingham, WA

RE: Post Point Incineration: Synthetic Minor Comment Batch #3

1.) The Continuous Monitoring Rolling Average Time Block should be based on no more than a 24-hour block average (using 1-hour averages of data) to determine compliance with this permit, adjusted for 7 percent moisture. A single-day rolling sum based on not exceeding 90 tons per year must never be more than 5,917 pounds per month or 197 pounds per day. This permit must include a daily, monthly, and yearly performance expectations and compliance schedule.

Due to the past four years of indications of unacceptable CO emissions, enforcement of the CO emissions must be timely and meaningful: The regulators should impose the most stringent testing protocols to ensure excessive pollution is not occurring. Waiting a year to tabulate is inappropriate for a suspected polluter facility (See Table 2 to subpart LLLL of part 60 CFR 40). The public wants maximum protection, not minimal monitoring.

- **2.) The Repercussions** of exceeding the daily and/or monthly limitations should be timely and explicitly agreed to, ideally in an approved compliance plan or consent decree. Post-infraction procedures should oblige the operator to comply with "LLLL" and/or PSD limits or cease operations.
- **3.) Sensor placement** must comply with the testing methods and techniques described throughout the Clean Air Act for this situation. Mixing air prior to testing or sensing is inappropriate unless all flow testing of introduced air is considered, measured, and included in the pre-test stabilization analysis and other required quality assurance methods for the quality of testing controls and ultimate accuracy.
- **4.) Site Specific Monitoring Plan required** to determine accurate CO measurements, temperature, oxygen, and moisture level of tested air (including testing of secondary, introduced diluted shaft cooling air) must also have approved testing protocols.
- **5.) In Addition to the "PSD" 90TPY Limit, this permit should address and ensure compliance with "LLLL"** for CO. Emissions must be below the "LLLL" (example: based on the 24-day rolling average of 27 parts per million by dry volume).
- **6.)** An operating, non-compliant, unpermitted "LLL" or "LLL" Stationary Sewage Incinerator Is still a "New Source" with or without a Synthetic Minor Permit. The appropriate permit for this public hearing should be for a "New Source Review Public Hearing,

" not just addressing this singular Carbon Monoxide issue. There are multiple other inappropriately unregulated emissions occurring at this facility, and the public wants you all to regulate us better now. The applicant and regulators should provide the community with the known health and legal exposure risks and impacts of operating a New Source Facility without all permits.

8.) The Issuance of this permit is not in the Public's interest. There are immediate, affordable EPA-recommended disposal solutions to stop this air and water pollution, yet this proposed permit encourages the offending facility to continue illegal incineration without any enforcement of any of the several other current permit violations.

It is not in the public's interest to issue the proposed permit to Any Sewage facility that operates in violation of any law, including Clean Water Act, Washington State Laws relating to Biosolids ("503s), Solids Waste Handling("173's), Bellingham City Code regarding burning without a permit or allowing the wet scrubber mercury-laden, "Process Waters" be reintroduced into the headworks add up to a facility that should not be permitted to continue to operate at all.

- **9.) Can the regulators assure and show the public** that the other required sensors and monitoring of the **other eight pollutants reveal near 100% compliance?** How many deviations were there during the last four years? How do we test for Mercury and Dioxin's and Furans? It is not appropriate to permit a non-compliant facility.
- **10.)** The incinerators have been reportedly operating "at capacity" since **2012.** Overfeeding Multiple Heath Furnaces result in CO. Adjustments (increases) to the feed rate extended the capacity to meet our needs. With the current rate of growth within the city, how soon will there be no redundancy in the system? Is that now? The city has proposed to continue using these two incinerators at capacity for ten years or more. The permitting agency must address this capacity of in a few years the facility will be over-capacity, if it isn't already.

From: <u>Larry McCarter</u> To:

Agata McIntyre
Bellingham Incinerators: RO-52 Comment Batch #2
Tuesday, May 13, 2025 8:45:54 AM Subject:

Date:

RO-52 commnets.pdf Attachments:

To: Agata McIntyre NWCAA 1600 S 2nd Street Mount Vernon, WA

From: Larry McCarter 212 Hawthorn Road Bellingham, WA

RE: Post Point Incineration: Synthetic Minor Comment Batch #2

1.) Synthetic Minor Permit is Inappropriate & Unavailable to "New Source" Generators
By operating the incinerators without an approved Air Operating Permit, the City of Bellingham has involuntarily become subject to the Prevention of Significant Deterioration program under the Clean Air Act. The application for a Synthetic Minor is inappropriate as the City has irreconcilably violated the "Federal Plan" by continuing to operate without a permit to operate and is now irrevocably a New Source incinerator. There is no legal bridge back to "LLLL" for a facility that has been in violation of this rule ever since it was enforceable in March of 2016. A synthetic Minor would have been appropriate for a facility such as Lynnwood, WA who had a SSMP and AOP's inplace. Bellingham is now ineligible for this kind of permit.

2.) Obtaining an Approved Air Operating Permit Comes First.

This permit application for installation and operation of the CO monitors must be included in an approved facility-wide Air Operating Permit that meets or exceeds best available air control technology as defined for New Source facilities.

- **3.)** CO Testing Parameters: Best Available with shortest rolling average period available This order should include the testing parameters no longer than a 30 day rolling average to comply with New Source Regulations. Maximum levels should be "LLLL" or New Source, but certainly not "LLL". This facility is in a non-compliant status that is suspected of serious pollution and delaying testing is inappropriate given its history.
- **4.) CO Exceedance Consequences and Timelines Need Definition in the Permit**This Order should include and annunciate consequences of any failure to continuously comply with all emission and reporting requirements after the first 30 day increment has passed and tests are in. Daily fines for violating the CAA can be as high as \$60,000 per day. Bellingham has had over 3,000 days of non-compliance but not one dollar of fines? What will be the consequences of failing the CO limit and how soon will the agency require any action to remedy any failings of this permit?

Overview and Background of Comments: (see Comments A-I below)

The City of Bellingham continues to operate regardless of having failed to produce in a timely manner the required Site Specific Monitoring or Compliance plans for either the "LLL" or the "LLL" class of incinerators. As a result of these omissions, the city now (reluctantly) finds itself a solid waste combustion unit subject to the penultimate New Source Regulations. There is no bridge back to the lesser levels. Nor is there some implied permission granted to continue operating without increasing liability for all parties.

A.) No AOP = No Operations

This order can not be approved as written as it fails to address the vacancy of any underlying Air Permit at all. No facility may legally incinerate without producing requested and required compliance plans (See the history of Notice of Violations all request/require the city submit specific monitoring plans). Producing approvable plans today will not undo the automatic regulatory adjustments made pursuant to the dictates enumerated in the Federal Plan that is a part of the Clean Air Act.

B.) Operating without a permit = "New Source Review"

I contend the suite of rules designed to manage solid waste incineration units such as our Stationary Sewage Incinerators demand the application of New Source performance guidelines.

C.) Federal Plan dictates "BACT" be in place before continued operations

The Federal Plan dictates any facility that has failed to obtain, or maintain an Air Operating permit must not operate without complete adherence to the New Source Requirements which includes immediate demonstration and implementation of Best Available Air Control Technology.

D.) City Intends to Continue Operating 4-6 years out of compliance: Fines are Inorder The city operates the facility in complete disregard (denying applicability of even lesser levels of regulatory oversight) of these compliance requirements and in fact proclaims its intent to continue operating without permits for the next 4-6 years while they try to comply with "LLLL" and in fact suggests the "LLLL" levels do not even apply to their SSI units.

E.) Regulators Duty to Stop the Polluting with Fines and Orders

It is the duty of the regulators to apply the law, use the fines and require an immediate shutdown due to failure to comply with New Source Rules for "LLL" or "LLL" testing and reporting protocols which demand best available air controls and monitoring be already on file prior to any incineration.

F.) Fines are Appropriate and Late

Law dictates there should be daily financial penalties for burning without a monitoring plan. The law suggests a criminal penalty for burning without these permits. I am not suggesting criminal charges are at all appropriate, but the fact that the fines are so big with criminal options tells me regulators somehow ignore the clearly implied mandate of the very specific enforcement schedules and hefty daily fines.

G. Shutdown Notices is Appropriate, and Overdue:

There should be legal action to require a shutdown as the City has disclosed compliance will take 4-6 years. The Clean Air Act declares it criminal to do nothing about known violations and everybody knows the City of Bellingham is operating in violation of "LLLL" and as such, according to the Federal Plan, this facility is now automatically, and irreversibly a New Source generator.

H. Chicken and the Egg: No Monitoring Plan = No Grounds for Violations?

Bellingham incinerates without approved testing protocols and so this agency can not, and does not know if the facility is polluting. No exceedances will occur until an AOP is in place Because there are no limits to exceed until the AOP is in place.

I.) This Order should include Mercury, Dioxin, Furan testing and compliance: The CO monitor issue raises concerns about all of the testing parameters within this facility. EPA letter of 2019 raised concerns of inadequacy of the testing for these parameters.

The matter of "dilution" of all other test samples taken at Post Point should be reviewed and reported on.

From: <u>Larry McCarter</u>
To: <u>Agata McIntyre</u>

Subject:RO-52 McCarter Comments (PDF Format)Date:Thursday, May 8, 2025 8:15:27 AM

Attachments: Blank 51.pdf

This might be easier. It is the same as the email.

Sent From Larry's IPad.

Agata McIntyre
Northwest Clean Air Agency
1600 South 2nd Street
Mount Vernon, WA, 98273

RE: Comments on Synthetic Minor Source Permit Order RO-52

Hello,

My name is Larry McCarter. I live at 212 Hawthorn Road, Bellingham WA.

I have assembled here my first ten comments on the recently published proposed order RO-52 to issue a "Synthetic Minor Source Permit," thereby creating and establishing limits on operations at the SSI Units in Bellingham, WA. I will want to have a hearing on my comments. Please sign me up for a hearing if possible. Thank you.

Preface: It is my understanding that the CO monitors are just now being calibrated and tested and I think that is great news, except that I do not believe the incinerators are legally operating in the first place. My comments are focused on how we gather the data and then how we plan to use the data to insure compliance with all laws, including the SEPA.

<u>First Comment:</u> A facility-wide, comprehensive SEPA review is required now. A SEPA review would undoubtedly protect and benefit the affected communities. The potential impacts of compliance or non-compliance must be addressed now before the "event" of non-attainment occurs and the polluting does. We do not have an AOP, and no SEPA was ever done. Operating without an Air Permit or a current SEPA is unacceptable.

The RO-52 permitting event is not just an "order"; it is also equally termed a "synthetic minor source permit" proposing to alter or change a permittee's limit to emit. It is, therefore, subject to a SEPA review. The consequence of the monitor's physical installation and the consequential environmental impacts of enforcing this permit must be examined under SEPA. The whole purpose of this order is to protect Bellingham residents from the deteriorating effects of CO, but the measure of environmental protection resulting from this order can only be known and then measured or reviewed if stated here and now in this permit. No comment or action resulting from failure to comply is enumerated in the permit, and therefore, no examination of the detrimental impacts is being conducted. These reviews should be included now as conditions of the permit.

This permit as written does not adequately identify any actual proposed enforcement actions (Self-reporting, Self-shutdown or Fines Owed for Deviations) that the permittee will take. These critical triggers or actions are missing from this permit or any SEPA review. Accurate "Self-Reporting" must be a permit condition included in the SEPA evaluation to ensure prompt permit enforcement by the permittee. SEPA should examine the need for rapid response to exceedances and include self-reporting and shutdown protocols and plans. The Plan's SEPA review should include a rapid response plan to cease incineration if these permit limits are exceeded.

No SEPA study has ever addressed deviations, violations, or these new excessive emissions. Any changes to the excessive generation of CO up to 90 tons or 100 tpy have environmental consequences that should be examined and reviewed and were never reviewed in any prior SEPA. Violations and deviations are common at this facility; Any future permitting should be subject to and conditioned upon first obtaining an Air Operating Permit ("AOP").

This permit fails to require compliance with the Clean Air Act's requirement to operate only with approved Air Operating Permits and to have and be using approved site-specific monitoring plans that might have undergone a comprehensive, up-to-date SEPA process. The permit must examine the environmental consequences and impacts to the community by issuing this Order and simultaneously allowing continued operation without an Air Operating Permit that complies with either "LLL" or "LLL" or "PSD" regulations. All of this would come to light in an intensive SEPA review.

What is missing is consideration if the City fails to comply with this order. SEPA should study the adequacy of enforcement remedies and include regulatory response provisions such as notification procedures, frequency of reporting, designed plans for alternative disposal off-site, and/or plans for rapid response when and if the tests prove the city is, in fact, polluting beyond the agreed-upon or 100TPY limit.

A new SEPA is needed for operating without a AOP. The reasoning provided by the guest attorney that suggests no SEPA is necessary because an AOP would undergo the required SEPA scrutiny does not hold water in this situation as the facility does not have an approved AOP and has, therefore, not undergone a comprehensive SEPA at all. Now that we are permitting a 10-year "fix" for a self-reported failure to comply with a non-existent monitoring plan, this order must be scrutinized in terms of a new SEPA to determine and be able to assess the new impacts of success or failures at Post Point. A SEPA permit is applicable just as any Conditional Use permit ("CUP") undergoes SEPA review; CUP's often only provide the actors "guidelines" or guardrails within which operations may occur without any equipment installations. A proper incinerator SEPA analysis will include identifying a proposed accurate testing plan and ensures best frequency and location of the tests. A proper SEPA would examine specific testing analytics and computations including ppm/time and the SEPA process would clarify

a "bright line" CO determination and sequence of response if any given test violates this order.

Additionally, a new sepa should be triggered anyway for any permit being issued to the facility that has and will possibly operate beyond the original "limits" as they were originally imposed.

This order's SEPA should include provisions and requirements for analysis of the impacts that result from not having an EPA-approved Air Operating Permit nor a Site Specific Monitoring Plan SEPA review in place and how the law dictates the facility that operates without an AOP is subject to the program and rules aimed at the prevention of significant deterioration of the environment and therefore, by law, we have become a "major source" that now requires the best available air control technology ("BACT") for the monitoring and testing of the entire range of 188 pollutants, not just nine as proposed. The inadequacy of this order is apparent when "BACT" is applied as it should be due to failure to produce approvable AOP or an SSMP due in 2016.

And finally, on SEPA, if and when the monitoring reports find the CO exceeds the 90-ton limit, it means we have a dormant but potentially non-compliant condition that needs study and resolution coupled with this permit: What must the city do if it finds itself polluting? What will the Regulators demand? How long will the polluting go on before an off-loading facility can be built? These conditions and plans should be a part of this permit and should be considered in regards to an SEPA review of the impacts the CO monitors will be having on Post Point operations. The non-compliant scenario is unexamined and must be at least planned for and reviewed.

Second Comment: I disagree with using the 90-ton limit instead of the 100-ton per year. After seeing the facility operate under test power outage conditions, I think the facility-wide CO emissions should be monitored and known. I have seen first-hand smoke coming from other stacks at the facility, as well as smells. I will include a video of the backup diesel equipment operating for the record, and I feel these Smokey sources should all be combined to obtain the most accurate data for the surrounding communities.

<u>Third Comment:</u> CO sensor placement should be before any outside air is allowed into the stack after combustion. The proposed monitor location is NOT in the <u>best</u> location (after outside air is introduced). Details such as airflow meter type, duct sizes, distance from flame, turbulence, and monitor/sensor specifications, and analytic metrics should be made available for third-party verification and comment and included in this order's information packet.

Fourth Comment: The order does not clarify the consequence of failing to comply with the 90 tpy limit. There is no actionable enforcement provision or practical way to stop the potential pollution. History has shown us the sewage will keep coming, and the burning will continue whether the facility complies or not. Knowing the city will continue operating with or without these permits or monitoring plans, provisions for self-reporting and feed rate reductions or commitment to shutdown or a daily enforcement fine rate must be included in the order. As a practical matter, the City can not simply shut down if they find they are violating this permit. As a condition of this permit, it should be a requirement to have an alternative off-site loading facility designed to handle all the interim disposal while 'LLLL" AOP permits are applied for and approved. We need to know if the City is obligated to self-report any deviation above the rolling daily average and how or when the City will shut down should they violate this permit. Will there be fines? Consequences for failure are not addressed, which will result in predictable, unnecessary polluting.

<u>Fifth Comment</u>: The order does not make clear that continuous CO compliance will be rolling averages of the previous 24-hour period and not a blocked interval.

<u>Sixth Comment:</u> The order does not make clear what happens if the city exceeds the daily limit of CO.

<u>Seventh Comment:</u> There is no approved AOP or site monitoring plan and so approval of this order is not timely.

<u>Eighth Comment:</u> Since 2016, this facility has been allowed to operate without an AOP, which means no permit should be issued, and fines should be imposed for every day we operate without compliance with the BACT as we are now a Major Source due to failure to submit approvable petitions for Air Operating Permits. The city and NWCAA are liable for failing to enforce the Clean Air Act's clear requirement to operate with all permits and associated monitoring plans.

Ninth Comment: The facility has been operating out of compliance without an AOP since 2016 and is, as such, subject to "best air control technology." The CO monitor placement is not in the best location, nor is it the best monitor. Neither is the proposed test protocol the most accurate available nor are the proposed reporting or response times clearly defined in the best possible way.

<u>Tenth Comment:</u> This permit/order should not be issued without a demand prescribing a secondary disposal method be immediately constructed and commissioned for interim use while the City completes all AOP paperwork and installs all necessary and Best Air Control Equipment to be in compliance with the "LLLL" or "PSD" regulations.

Sent From Larry's IPad.

From: <u>Larry McCarter</u>
To: <u>Agata McIntyre</u>

Subject: McCarter: RO-52 Comments **Date:** Thursday, May 8, 2025 7:38:42 AM

May 8, 2025

Agata McIntyre Northwest Clean Air Agency 1600 South 2nd Street Mount Vernon, WA, 98273

RE: Comments on Synthetic Minor Source Permit Order RO-52

Hello,

My name is Larry McCarter. I live at 212 Hawthorn Road, Bellingham WA.

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Preface: It is my understanding that the CO monitors are just now

being calibrated and tested and I think that is great news, except that I do not believe the incinerators are legally operating in the first place. My comments are focused on how we gather the data and then how we plan to use the data to insure compliance with all laws, including the SEPA.

First Comment: A facility-wide, comprehensive SEPA review is required now. A SEPA review would undoubtedly protect and benefit the affected communities. The potential impacts of compliance or non-compliance must be addressed now before the "event" of non-attainment occurs and the polluting does. We do not have an AOP, and no SEPA was ever done. Operating without an Air Permit or a current SEPA is unacceptable.

The RO-52 permitting event is not just an "order"; it is also equally termed a "synthetic minor source permit" proposing to alter or change a permittee's limit to emit. It is, therefore, subject to a SEPA review. The consequence of the monitor's physical installation and the consequential environmental impacts of enforcing this permit must be examined under SEPA. The whole purpose of this order is to protect Bellingham residents from the deteriorating effects of CO, but the measure of environmental protection resulting from this order can only be known and then measured or reviewed if stated here and now in this permit. No comment or action resulting from failure to comply is enumerated in the permit, and therefore, no examination of the detrimental impacts is being conducted. These reviews should be included now as conditions of the permit.

This permit as written does not adequately identify any actual proposed enforcement actions (Self-reporting, Self-shutdown or Fines Owed for Deviations) that the permittee will take. These critical triggers or actions are missing from this permit or any SEPA review. Accurate "Self-Reporting" must be a permit condition included in the SEPA evaluation to ensure prompt permit enforcement by the permittee. SEPA should examine the need for rapid response to exceedances and include self-reporting and shutdown protocols and plans. The Plan's SEPA review should include a rapid response plan to cease incineration if these permit limits are exceeded.

No SEPA study has ever addressed deviations, violations, or these new excessive emissions. Any changes to the excessive generation of CO up to 90 tons or 100 tpy have environmental consequences that should be examined and reviewed and were never reviewed in any prior SEPA. Violations and deviations are common at this facility; Any future permitting should be subject to and conditioned upon first obtaining an Air Operating Permit ("AOP").

This permit fails to require compliance with the Clean Air Act's requirement to operate only with approved Air Operating Permits and to have and be using approved site-specific monitoring plans that might have undergone a comprehensive, up-to-date SEPA process. The permit must examine the environmental consequences and impacts to the community by issuing this Order and simultaneously allowing continued operation without an Air Operating Permit that complies with either "LLL" or "PSD" regulations. All of this would come to light in

an intensive SEPA review.

What is missing is consideration if the City fails to comply with this order. SEPA should study the adequacy of enforcement remedies and include regulatory response provisions such as notification procedures, frequency of reporting, designed plans for alternative disposal off-site, and/or plans for rapid response when and if the tests prove the city is, in fact, polluting beyond the agreed-upon or 100TPY limit.

A new SEPA is needed for operating without a AOP. The reasoning provided by the guest attorney that suggests no SEPA is necessary because an AOP would undergo the required SEPA scrutiny does not hold water in this situation as the facility does not have an approved AOP and has, therefore, not undergone a comprehensive SEPA at all. Now that we are permitting a 10year "fix" for a self-reported failure to comply with a nonexistent monitoring plan, this order must be scrutinized in terms of a new SEPA to determine and be able to assess the new impacts of success or failures at Post Point. A SEPA permit is applicable just as any Conditional Use permit ("CUP") undergoes SEPA review; CUP's often only provide the actors "guidelines" or guardrails within which operations may occur without any equipment installations. A proper incinerator SEPA analysis will include identifying a proposed accurate testing plan and ensures best frequency and location of the tests. A proper SEPA would examine specific testing analytics and computations including ppm/time and the SEPA process would clarify a "bright line" CO determination and sequence of response if any given test violates this order.

Additionally, a new sepa should be triggered anyway for any permit being issued to the facility that has and will possibly operate beyond the original "limits" as they were originally imposed.

This order's SEPA should include provisions and requirements for analysis of the impacts that result from not having an EPA-approved Air Operating Permit nor a Site Specific Monitoring Plan SEPA review in place and how the law dictates the facility that operates without an AOP is subject to the program and rules aimed at the prevention of significant deterioration of the environment and therefore, by law, we have become a "major source" that now requires the best available air control technology ("BACT") for the monitoring and testing of the entire range of 188 pollutants, not just nine as proposed. The inadequacy of this order is apparent when "BACT" is applied as it should be due to failure to produce approvable AOP or an SSMP due in 2016.

And finally, on SEPA, if and when the monitoring reports find the CO exceeds the 90-ton limit, it means we have a dormant but potentially non-compliant condition that needs study and resolution coupled with this permit: What must the city do if it finds itself polluting? What will the Regulators demand? How long will the polluting go on before an off-loading facility can be built? These conditions and plans should be a part of this permit and should be considered in regards to an SEPA review of the impacts the CO monitors will be having on Post Point

operations. The non-compliant scenario is unexamined and must be at least planned for and reviewed.

Second Comment: I disagree with using the 90-ton limit instead of the 100-ton per year. After seeing the facility operate under test power outage conditions, I think the facility-wide CO emissions should be monitored and known. I have seen first-hand smoke coming from other stacks at the facility, as well as smells. I will include a video of the backup diesel equipment operating for the record, and I feel these Smokey sources should all be combined to obtain the most accurate data for the surrounding communities.

Third Comment: CO sensor placement should be before any outside air is allowed into the stack after combustion. The proposed monitor location is NOT in the <u>best</u> location (after outside air is introduced). Details such as airflow meter type, duct sizes, distance from flame, turbulence, and monitor/sensor specifications, and analytic metrics should be made available for third-party verification and comment and included in this order's information packet.

Fourth Comment: The order does not clarify the consequence of failing to comply with the 90 tpy limit. There is no actionable enforcement provision or practical way to stop the potential pollution. History has shown us the sewage will keep coming, and the burning will continue whether the facility complies or not. Knowing the city will continue operating with or without

these permits or monitoring plans, provisions for self-reporting and feed rate reductions or commitment to shutdown or a daily enforcement fine rate must be included in the order. As a practical matter, the City can not simply shut down if they find they are violating this permit. As a condition of this permit, it should be a requirement to have an alternative off-site loading facility designed to handle all the interim disposal while 'LLLL' AOP permits are applied for and approved. We need to know if the City is obligated to self-report any deviation above the rolling daily average and how or when the City will shut down should they violate this permit. Will there be fines? Consequences for failure are not addressed, which will result in predictable, unnecessary polluting.

Fifth Comment: The order does not make clear that continuous CO compliance will be rolling averages of the previous 24-hour period and not a blocked interval.

Sixth Comment: The order does not make clear what happens if the city exceeds the daily limit of CO.

Seventh Comment: There is no approved AOP or site monitoring plan and so approval of this order is not timely.

Eighth Comment: Since 2016, this facility has been allowed to operate without an AOP, which means no permit should be issued, and fines should be imposed for every day we operate

without compliance with the BACT as we are now a Major Source due to failure to submit approvable petitions for Air Operating Permits. The city and NWCAA are liable for failing to enforce the Clean Air Act's clear requirement to operate with all permits and associated monitoring plans.

Ninth Comment: The facility has been operating out of compliance without an AOP since 2016 and is, as such, subject to "best air control technology." The CO monitor placement is not in the best location, nor is it the best monitor. Neither is the proposed test protocol the most accurate available nor are the proposed reporting or response times clearly defined in the best possible way.

Tenth Comment: This permit/order should not be issued without a demand prescribing a secondary disposal method be immediately constructed and commissioned for interim use while the City completes all AOP paperwork and installs all necessary and Best Air Control Equipment to be in compliance with the "LLLL" or "PSD" regulations.

Sent From Larry's IPad.

 From:
 Larry McCarter

 To:
 Agata McIntyre

 Cc:
 Kim J Lund

Subject: RO-52 Comment: Improper CO Sensor Sampling Location per CAA Part 60 appendix B Methods 8 and 7e

combined.

Date: Friday, May 30, 2025 7:44:54 AM

Attachments: IMG 0301.jpeq

IMG 0155.png

Hello,

City of Bellingham has the duty to install sensors that will generate meaningful data. NWCAA has the duty to know and enforce the explicit regulations governing incineration. I presume every effort is being made by all parties to accurately calibrate and establish suitable testing procedures. I truly do suspect, because I do not know of all the efforts or testing protocols and "engineering" going on in the background that I am wrong suggesting our data will be flawed due to dilution prior to testing. But in the interest of being over protective of my family and our environment I must point out discrepancies in this Order/Permit.

CO Monitoring = "LLLL" to "MMMM" to Appendix B to Method 10 to Method 7E

I have traced the legal framework for CO sensor location standards to originate in the "LLLL" standards that then reference the "MMMM" standards that then specifically require adherence to sensor location and testing standards found in an Appendix B, and that section then references the Model 10 and 7 testing methods and discover there is quite a distinction between <u>diluted and non-diluted systems</u> which is essentially a ban of sorts of any and all "leaks". Introducing cooling shaft air prior to testing would certainly be considered a "leak" (if not a "gusher").

I by no means pretend to have a comprehensive understanding of these rules or how the testing is actually going on but, glaringly the proposed testing protocols do not comply with the "LLLL" testing standards due to *the allowance of leaks resulting in dilution*.

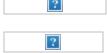
Carbon Monoxide and Oxygen Tests in Unison?

Additionally, I see that CO, Oxygen and Moisture are to be tested from the same general area and I would like NWCAA to verify the testing of CO, O and H20 adheres to the "LLLL" regulations. (Which raises the question about mixing before the Total Hydrocarbon tests).

Please amend the order to insure the diluted exhaust gases do not interfere and are not introduced prior to any emission pollutant CO sampling so as to comply with "LLLL".

I would like to include for the record two documents. One documents the cooling air introduced after the exhaust gases exit the incinerator is there for dilution which is expressly forbidden in any test. The other is the drawing provided which does not show the oxygen sensor location but does show the sensor is located after the introduction of fresh air.

Larry	McCarter



...

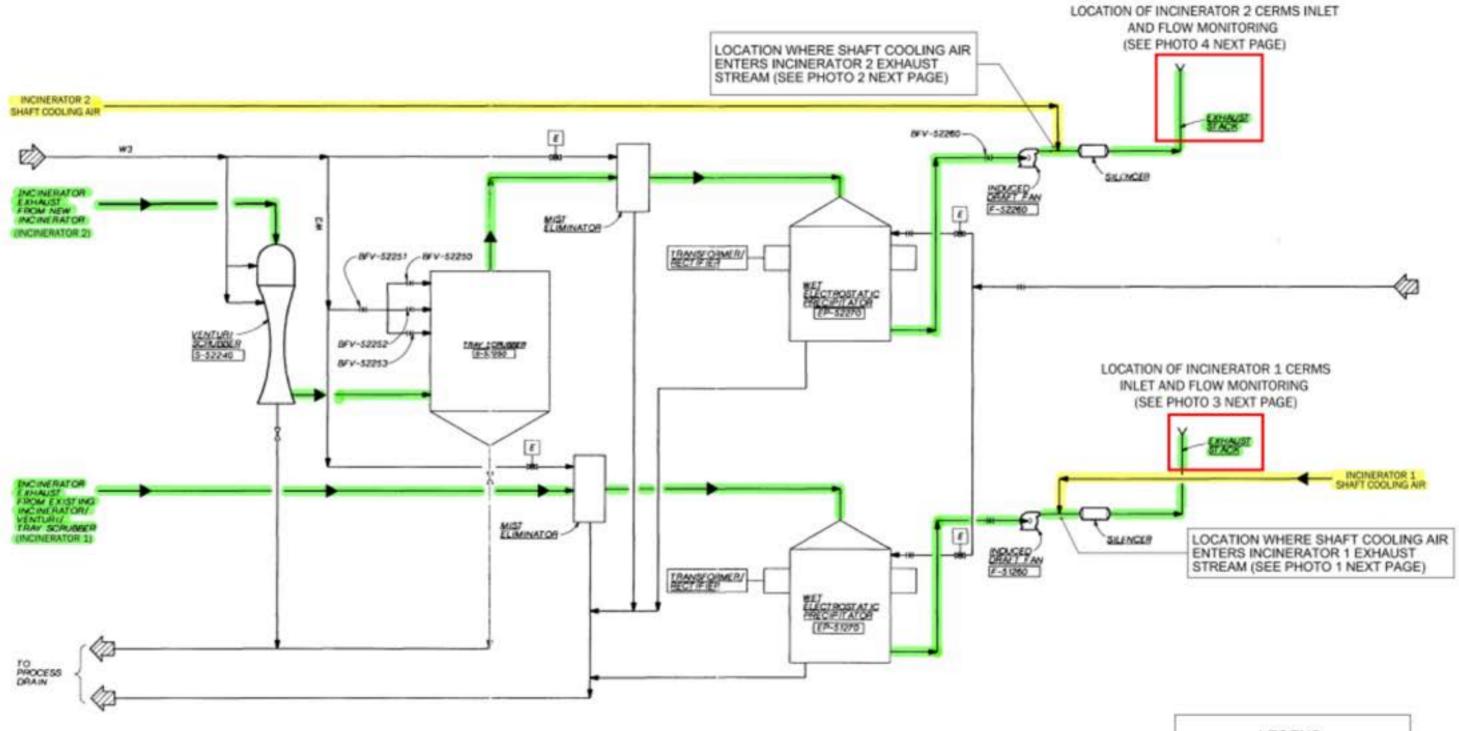


1600 South Second Street Mount Vernon, WA 98273-5202 ph 360.428.1617 fax 360.428.1620

www.nwcleanair.org

Regulatory Order Worksheet

Diagram of proposed CERMS installation location from Steve Bradshaw's 11/12/24 email (email saved as part of permit file)



Summary of CERMS Inlet Location

The Post Point carbon monoxide (CO) Continuous Emissions Reporting and Monitoring Systems (CERMS) inlet will be installed on the incinerator emissions stack approximately 40-feet downstream of the location where the shaft cooling air blends with the incinerator emission stream.

The shaft cooling air is introduced to the incinerator emission stream immediately downstream of the induced draft fan (see Photos 1 and 2 on PDF page 2 of 2). The blended emission stream and shaft cooling air is then conveyed from the lower portion of the stack (within the WESP room) to the upper stack, located on the roof of the WESP building. The upper stack is constructed with flanged ports where the CERMS inlet will be installed. These ports are shown in Photos 3 and 4 on PDF page 2 of 2.

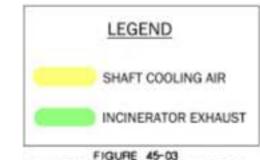


FIGURE 45-03 SLUDGE INCINERATION EMISSION CONTROL SYSTEM POST POINT PCP

OPERATIONS MANUAL

From: Toby Mahar <TobyM@nwcleanairwa.gov>
Sent on: Friday, September 20, 2024 10:39:56 PM

To: Conley, Sara <conley.sara@epa.gov>

CC: Agata McIntyre < Agata M@nwcleanairwa.gov>

Subject: from the 1972 Post Point contract...

And here's a little snippet from the past: The PP unit was spec'd out for the shaft cooling air to be used as a diluent from the get-go:

with minimum wall thickness of 1/8-inch."

- SPECIAL SPECIFICATIONS SCHEDULE F.
 - a. Page 249, paragraph 6, in line 1 change "275 gpm" to read "325 gpm."
 - b. Page 251, paragraph 4, in item 4 change "120 degrees F" to read "90 degrees F." Also, at the end of the page add the following item:

"All shaft cooling air shall be available for mixing ith the scrubber exhaust gas to aid in plume suppression.

"Minimum plume suppression capability shall consist of mixing 2,000 scfm of 300 degree F shaft cooling air with the scrubber exhaust gas. Alternate systems with no shaft cooling air shall reheat the scrubber exhaust gas, without adding water

-1-

vapor, to a minimum of 300 degrees F before discharging it to the atmosphere. Scrubber outlet gas temperature may be 110 degrees F if reheat is to 550 degrees F. Psychometrically equivalent plume suppression techniques will be considered, subject to approval."

From: Larry McCarter <rdslarry@mac.com>
Sent: Saturday, May 31, 2025 11:21 AM
To: MengChiu Lim; Agata McIntyre

Cc: John Ryan; ccmail@cob.org; Kim J Lund; markb@nwcleanair.gov

Subject: RO-52 Comment: Two Sewage Incinerators Need Imposition of State Law

Dear State of Washington Ecology Air Quality Division:

Thank you again for helping me explore the air quality issues my community is facing. This letter is going to "double" as a request for action by Ecology and as a comment to the upcoming permit request for a High Priority Violator in Bellingham to continue operating under the Potential to Significantly Deteriorate program.

EPA's Sewage Incineration Enforcement has Fallen Through the Cracks:

As I learn more, I now have more specific comments and questions regarding the state's obligation to monitor the EPA's agent's actions or in this case proposed lack of action overseeing the High Priority Violations occurring within Northwest Clean Air Agency's ("NWCAA") jurisdiction.

According to our EPA approved "State plan" Ecology has an obligation to oversee the enforcement of the CAA. The two sewage incinerators NWCAA manage are both operating without monitoring plans or their associated air permits and all discretionary 180 day compliance periods have long passed, negotiations stalled with no indication of change for at least another year.

The State must take an active, timely role addressing the high priority failure to monitor and control Combined Sewage Sludge Incinerators generating pollutants potentially deteriorating this four county region. (Over 100 tons of a single pollutant is enough to worry about and motivates me, knowing CO is a marker for poor combustion emitting equal amounts of other, non regulated chemicals of concern such as PFAS).

I bring this all to your attention due to the upcoming issuance of a synthetic minor permit to the Bellingham facility that I believe is ineligible for said permit due to the fact that there are no underlying air operating permits or usable monitoring data to assure any compliance. The proposed order adopts an improper sensor location and the rolling average is inappropriate for compliance of synthetic Minor permitting of a HPV that is likely to violate again.

Are there not Washington Laws prohibiting HPV major sources with a likelihood of violating again from operating without good data any longer than seven days after the new CO monitors have been installed. Testing data has to be accurate and the state should weigh in on the sensor location. Use of test data must be first and foremost to protect the public, and waiting another year (making it five years) of poorly combusting our combined sewage sludge waste must be contrary to several Washington State laws.

NWCAA needs to be reminded of the Washington laws by commenting on their proposed Order.

This is what what is wrong with the order: seven days maximum, not 365.

Current permit compliance conditions are to roll an average over a 12 month period, but this is unprotective of public's health and runs counter to the PSD program from HPV facilities; There are specific 7-day 24 hour blocks that are to be used to determine the fate of this facility, not 365 days as proposed. Any failure to stay under 100TPY computed on an 7-day rolling average triggers a new Source review, which equates to a shutdown, which the State should be prepared to enforce.

Here is a good review of enforcement for HPV in the PSD program & Synthetic Minor Permits:



The New CO data will statistically show by the end of the first week if the facility is likely to exceed the annual limit. The dictates of the PSD and Synthetic minor permitting sections of the CAA limit any discretion on the timing or extent of enforcement action. Compliance would be seven days to meet compliance with BACT which, as a practical matter means a shutdown plus fines.

Why NWCAA Needs Washington State Enforcement Support:

The NWCAA has found itself tangled up in a semi-plausible Clean Air Act interpretive conundrum that I believe results in dangerous mis-handling of the Sewage Incinerator's air permits for both Anacortes and Bellingham. I do not know the details or history of Anacortes other than they too, like Bellingham do not have a permit. (As a side note, but clue to failure to enforce: The "board" of the agency is composed of the mayors/owners of the generators and so any enforcement is a conflict of interest for that whole agency's leadership).

NWCAA has told me they rely on guidance from the EPA for enforcement and they are not getting any "feedback" from EPA. But I also know the CAA is remarkably specific on testing protocols and numerical determinations and so whatever "feedback" NWCAA says it needs to issue operating permits, eludes me.

The enforcement hang up, or "condundrum" is this: NWCAA does not enforce best available technology because EPA never "approved" the AOP or monitoring plans and therefore NWCAA does not have any "approved" criteria on which to point to for enforcement; Specifics like Mercury testing, for instance, or not having had CO monitors already in place, years ago have been ignored for years. Without an approved SSMP, the many regulated and unregulated pollutants go unreported and un-enforced. But NWCAA doesn't need feedback, the laws could not be more specific about testing or numerical limits, or calculating penalties.

There is no Ambiguity: No Air Permit, No Burning

This is why and where the State has to step in and require the enforcement of the seven day notice for HPV Synthetic Minor facilities to comply. Shutting down Bellingham will be positive for everyone. Bellingham is currently a New Source due to "LLL" and the City announced on their website they will not be ready to comply with "LLLL" for 5-6 years. Again, the State needs to step in and protect us for the next 5-6 years and exercise the state law to protect Bellingham.

Post Point has applied for a Synthetic Minor (and maybe Anacortes should too!?) Post Point is now a High Priority Violator subject to the PSD program which implicates the State's plan and requires your agency to engage and oversee compliance with the best available technology.

Specifically I want you to look at the location of the CO Sensor in relation to the dilution of fresh air as proposed. I will follow this with the "comment" I sent to NWCAA for the upcoming Public Hearing that discusses in detail the Leakage and data processing.

Landfilling is Available Now

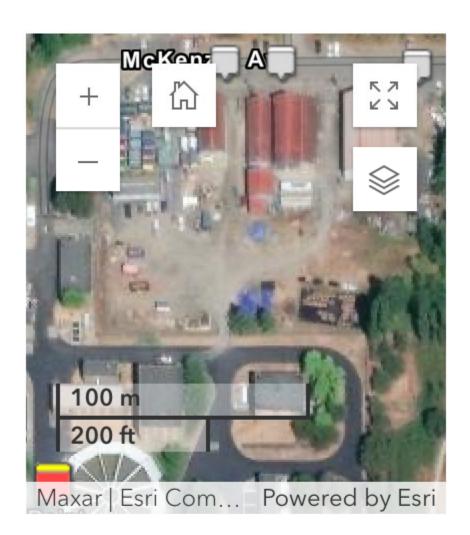
I can not believe the our State regulations for old Sewage Incinerators allows Major Source, High Priority Violators needing a synthetic minor permit that have self-reported violating the "LLL" condition years ago (and done nothing) can be granted anything more than the 7-day maximum period to test and then comply with the plain language of the law. The Incinerators are no longer needed to be in service as Landfilling is now available and is the EPA recommended disposal option for sewage sludges. There is no need for this pollution.

I am going to start looking in the WAC, but if the air rules are anything like the solid waste rules, the State needs to comment, or come to the Public Hearing on June 11, 2025 and weigh in on this persistent deterioration of our air quality.

Larry McCarter 212 Hawthorn Road Bellingham, WA 98225

Detailed Facility F

Facility Summary



POST POINT

200 MCKEN BELLINGHA

FRS ID: 110061.

EPA Region: 10

Latitude: 48.71

Longitude: -12

Locational Data

Industries: Adr

Environmental (

From: Larry McCarter <rdslarry@mac.com>
Sent: Saturday, May 31, 2025 11:34 AM
To: MengChiu Lim; Agata McIntyre

Subject: Post Point HPV information (wrong link last email).

I attached the wrong document on my last email.

Here is an EPA note that helped me:



https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fdrive.google.com%2ffile%2fd%2f1xh-slYgBYAPA87lZTr86Fe-dxtvRfF8j%2fview%3fusp%3ddrivesdk&c=E,1,Y8xxBfycc8sxb-

 $ZLdVihKJeiLWGHgqmMU74N5dqSCK7JO4qNXIJ4E8senJXrPrQmx3wGdUTp0UaSFl8ACrVq3GL4a4esas_8BOHTewcXA1-WdCGezmM17UcSh0qb&typo=1\\$

From: Larry McCarter <rdslarry@mac.com>
Sent: Sunday, June 1, 2025 5:21 AM

To: Agata McIntyre Cc: Kim J Lund

Subject: RO-52 Conflicts with Previous Order #442b

Attachments: RO-52 Conflicts with OAC442b.pdf

I just started to review previous orders and find some Oxygen parameters relevant to RO-52 and possibly facility wide monitoring errors due to dilution:

June 1, 2025

Agata McIntyre
Northwest Clean Air Agency

RO-52 Comment: Proposed Monitoring is inconsistent with Previous Orders of Approval to Construct: See Conditions 7 & 8 of OAC 442b.

I would like to comment and therefore draw attention to conflicts between the new order and Order #442b. I wish to reference NWCAA's "worksheet" that was prepared for the preexisting order, OAC 442b.

In this previous Order, Condition 7 describes the location of all current testing ports currently being used for compliance are to be located such that dilution occurs (after shaft cooling air), Condition 8 (page 5) prohibits the location of monitors after any dilution. It appears condition 8 was never met, and the current proposed order will also permit dilution prior to testing.

"Under sub-part "O" the oxygen is required to be monitored at the exhaust to the incinerator and prior to any potential diluting air that could get into the exhaust stream. In the case of Post Point, this means that the oxygen concentration <u>must be monitored prior to any air pollution control devices</u> given the system included an inducted draft fan that is located downstream of all control devices."

-NWCAA Worksheet OAC 442b pg.7

RO-52 conflicts with preexisting Order 442b condition 8. R0-52's proposed location of the new CO monitors after the introduction of outside air will not satisfy the 442b requirements nor the CAA's CO and Oxygen testing protocols as described for HPV violators.

As proposed, RO-52 would separate Oxygen and CO sensors which are by code to be colocated in similar, undiluted locations near the combustion chamber. CO sensors must be colocated with Oxygen sensing per OAC442b.

The proposed CO location also conflicts with standard engineering principles and will yield inaccurate or less accurate results. Best available criteria applies to the location of any new sensor.

Additionally, regarding rolling averages and block times, OAC 442b Condition 7 and 8 succinctly describes utilizing a four hour average to obtain a daily compliance schedule (temp) which should also be the time any CO deviation could be acknowledged, triggering the "zero day" of the Seven Day Rule established as the compliance window afforded High Priority Violators to cease the polluting.

It is curious and somewhat alarming to see a note in this worksheet that in 2017 the City said they were going to install CO monitors to replace total Hydrocarbon monitoring but to now know since then we have logged at least four years of exceeding the 100tpy limit of CO and only this month managed to install the monitors, on the roof in existing ports.

Larry McCarter

From: Lim, MengChiu (ECY) <mlim461@ECY.WA.GOV>

Sent: Tuesday, June 3, 2025 10:27 AM

To: Larry McCarter Cc: Agata McIntyre

Subject: RE: RO-52 Comment: Two Sewage Incinerators Need Imposition of State Law

Larry,

Thank you for providing your concerns about the sewage sludge incinerators at Post Point Treatment Plant to us. Northwest Clean Air Agency (NWCAA) is the agency with authority over the treatment plant's emissions. We have been in communication with NWCAA (copied on this email) but recommend that you work with directly with them to address them.

MengChiu Lim, PE Washington State Department of Ecology Air Quality Program 360-995-3448

From: Larry McCarter <rdslarry@mac.com> Sent: Saturday, May 31, 2025 11:21 AM

To: Lim, MengChiu (ECY) <mlim461@ECY.WA.GOV>; Agata McIntyre <agatam@nwcleanairwa.gov>

Cc: John Ryan <jryan@kuow.org>; ccmail@cob.org; Kim J Lund <kjlund@cob.org>; markb@nwcleanair.gov

Subject: RO-52 Comment: Two Sewage Incinerators Need Imposition of State Law

External Email

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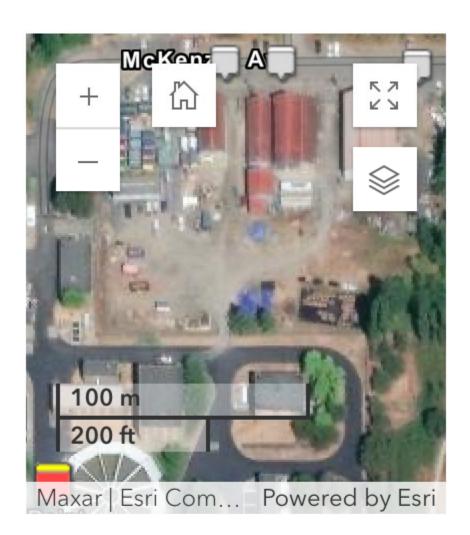
I can not believe the our State regulations for old Sewage Incinerators allows Major Source, High Priority Violators needing a synthetic minor permit that have self-reported violating the "LLL" condition years ago (and done nothing) can be granted anything more than the 7-day maximum period to test and then comply with the plain language of the law. The Incinerators are no longer needed to be in service as Landfilling is now available and is the EPA recommended disposal option for sewage sludges. There is no need for this pollution.

I am going to start looking in the WAC, but if the air rules are anything like the solid waste rules, the State needs to comment, or come to the Public Hearing on June 11, 2025 and weigh in on this persistent deterioration of our air quality.

Larry McCarter 212 Hawthorn Road Bellingham, WA 98225

Detailed Facility F

Facility Summary



POST POINT

200 MCKEN BELLINGHA

FRS ID: 110061.

EPA Region: 10

Latitude: 48.71

Longitude: -12

Locational Data

Industries: Adr

Environmental (

From: Larry McCarter < rdslarry@mac.com>

Sent: Friday, June 6, 2025 12:03 PM

To: Agata McIntyre

Subject: RO-52. Appeal process to "PCHB" & other Concerns

Attachments: PSD Changed Regulatory Action Plan.pdf

Hello,

Here ya go, another set from the peanut gallery.

-L. McCarter

June 6, 2025

Agata McIntyre NWCAA

MengChiu Lim, P.E. Washington State Department of Ecology Air Quality Division

Comment RO-52: This Proposed Order Implicitly/illegally allows continued unmonitored, non-compliant operation of a Major Source incinerator that has Violated the Washington State and Federal PSD rules: Ecology and NWCAA are both obliged to intervene in this polluting event and stop within seven days, all ongoing, known pollution. RO-52 should be denied.

Hello and thank you in advance for reviewing my comments.

Some of my concerns originate in the EPA papers and Ecology's publications on this matter:

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"EPA Should Conduct More Oversight of Synthetic-Minor-Source
Permitting to Assure Permits Adhere to EPA Guidance"
-Report No. 21-P-0175 July 8, 2021"
```

https://drive.google.com/file/d/1bw6tKc61WTpN7Ww2VeUcV_y_SrRj5pNR/view?usp=drivesdk

"Guidance on Washington State's Prevent of Significant Deterioration Permitting Program" -2017

State of Washington PSD Guidelines: https://drive.google.com/file/d/1TsVyVEORJk_jQo6agnXqbUXv1SUkrXmi/ view?usp=drivesdk

IN SUMMARY: PSD STATUS AT POST POINT CHANGES ENFORCEMENT DUTY AND ROLES FOR ECOLOGY

Ecology is obliged to engage and participate in this PSD avoidance permitting process. There are no exclusions or exemptions from ultimate in-state oversight of Title V and PSD high priority violators. Currently Post Point is a major source without a permit. Issuance of a Monitoring permit of just one pollutant does not somehow change this totally illegal operation nor does it reduce the risk in a timely manner. Washington State's Pollution Control Board may well be the first venue I address if this permit is granted in its current form. I want to be clarify the State elects to <u>not</u> comment on at least the former and proposed use of diluted air samples to prove compliance or operate without either a "LLL" or "LLLL" AOP or associated SSMP.

NWCAA & ECOLOGY'S DUTY IS SIMPLY TO PROTECT PUBLIC FROM PSD EVENTS

Ecology needs to be cognizant of this threat, and proactive protecting Bellingham's air quality. Due to the PSD status, both agencies now have overlapping obligations to insure CAA compliance. I disagree with Ecology desire to only defer to NWCAA enforcement strategy; the state of affairs warrants at a maximum, the seven day remediation actions and strict, protective

conditions that include 1 hour rolling averages with, certain ppm containment protocol, versus 365 day period. The state needs to insure Title V compliance as well as PSD and after 8 years of non-compliance the case will be made the state had adequate time to do something to protect our air. I still believe both agencies are the only two responsible parties for this failure to protect under at least the HPV and PSD rules.

NO AIR PERMIT, NO BURNING:

As a practical, common sense matter, there is no way state law permits the issuance of a Synthetic Minor Permit to a facility without an Air Permit. Not all enforcement authority has been delegated to enforce CAA. The state has never extinguished its duty to interpret the laws or protect the citizens of the state. NWCAA's presenting an Order that makes no mention of Title V compliance (Violation #1 March 2024) or the City's stated intent to take up to 6 years to reach title V Compliance must at least be addressed in a transparent manner so the public knows we are being monitored and protected by both the state and the EPA. The state is still very much one of the three responsible parties for the protection of a community's air quality and is liable to insure prompt, typical and BACT regulatory and testing measures are properly included in the conditions of this RO-52.

CURRENT "HPV" AND "PSD" DETERMINATIONS CHANGED REGULATORY MILIEU: WA STATE IS INVOLVED NOW

Ecology can not simply defer to another agency for the management of these permits after Bellingham self reported two flagrant violations (CO and missing AOP deadlines for"LLL" and/or "LLLL")the SIP does not include issuing a synthetic permit to an unpermitted source. This order as written does not comply with the PSD rules. The City's bold and flagrant compliance failings and assertion of inapplicability are less than weak arguments; There is a long list of title V violations including a lack of soils and air modeling that show environmental impacts caused by the uniquely short 35' stacks, suitable monitor locations, SEPA reviews that included studying the proposed timeline (4-6 years) to comply with a New Major source status contemplated in the order, No Operating Permit inclusion of BACT or meeting "LLLL" minimums and the fact that ongoing conditions are being monitored and regulated with certifiably diluted samples .

The managing jurisdiction of our community's air is within the scope of both agencies and I hope both agencies will work openly and transparently to check the boxes of PSD rules. We are a high priority violator that is operating a very old, top loading incinerator that has been operating over capacity since 2008 and as such, every opportunity to install proper equipment has been afforded the city. The city has opted to spend the least amount of money on upgrading or switching disposal methods. The people of our area are paying for these imagined "savings" of incineration by being polluted. There is no excuse for no enforcement. the rules are bright line rules with much detail on penalties. The CAA enforcement schedules, rules and policy all dictate the immediate shutdown of this unpermitted facility and issuing a stop-gap one year Synthetic Minor Permit that only addresses CO failings of this facility.

SYNTHETIC MINOR PERMIT IS INAPPROPRIATE AND SHOULD NOT BE GRANTED WITHOUT 100% TITLE V COMPLIANCE.

No facility that has other EPA approved and accessibly disposal options should be allowed to continue to operate without an Air Operating Permit. Bellingham's AOP application on file is for "LLL" compliance and that is no-longer applicable. NOV march 2024 is a date certain. The city has admitted applicability (veiled threats to challenge "applicability" are especially weak: the records show the legal shelter of claiming routine maintenance is absurd when we are talking about complete rebuilding and replacement of al components of the Units).

ENFORCEMENT FAILURES BY EPA AND STATE:

I perceive a willingness by the regulators to permit ongoing, non-compliant polluting. Both Agencies are allowing the record keeping and testing failings, including operating without an approved SSMP or AOP since 2011. This permit is the tool for all compliance matters and instead it permits poor sampling and ignores all other ongoing compliance failures.

NO TITLE V COMPLIANCE: CITY HAS NO REAL "APPLICABILITY ARGUMENT" = NO BURNING The City's specialist attorney is trying to sidestep Violation #1 by suggesting the "LLLL" doesn't apply because the city's expenses are largely "routine". The City doesn't meet "LLL" record keeping or testing requirements either, but "LLLL" is the standard today. RO-52 is inappropriate for a non-complying title V facility:

Beginning on page 11 of Ecology's PSD guidance document on the matter of Modification and expenditure of Routine Maintenance and Repair, there are numerous qualifying statements that all point to a bright line distinction that Bellingham is subject to "LLLL" and therefore incomplete violation. Everyone of the four-factors used by ecology to determine "RMRR" as they impact "LLL" or "LLLL" designation accurately describe Bellingham's situation:

"the RMRR exemption has been a source of frequent litigation since it first appeared in federal PSD regulation.... In determining whether a proposed activity constitutes "routine maintenance repair and replacement." Ecology relies on what is now widely known as the "four factor test...

- 1.) The project involved the replacement of numerous major components.
- 2.) the purpose of the project was to extend the life of the facility beyond its originally planned retirement date as an alternative to building new capacity.
- 3.) The work was "highly unusual."
- 4. The project was costly..."

-page 11-13 Ecology's PSD Guidance

Doc.

SYNTHETIC MINOR IS INAPPROPRIATE FOR ANY NON-COMPLIANT APPLICANT

The synthetic Minor program is not a requirement but rather an opportunity for facilities that otherwise show a likelihood of then being in 100% compliance find relief in the Synthetic Minor provisions, but Bellingham is not a suitable candidate for this permit because it is violating "LLLL" and "LLL" regulations that include failure to utilize sound and reasonable testing procedures to verify emissions.

Permitting a facility that has become a HPV based on 4-5 years of exceeding not only Title V, but PSD thresholds would be one thing, but in addition there are incredible lapses in Record Keeping that include testing that has not been approved or subjected to the BACT criteria. This permit should not be offered without valid SSMP inplace to ascertain actual emissions without the aid of diluting the samples.

PSD PROGRAM: WHAT SHOULD BE IN THE PERMIT

In the executive summary of the PSD program here in Washington State it reads.

"Ecology has been approved the responsibility for all PSD permitting in the state of Washington with the exception of sources on tribal land, and sources under the jurisdiction of the Energy Facility Site Evaluation council (EFSECO."

-Ecology 2017

I interpret this to mean Ecology is vested in this outcome. In the same Executing Summary the expectation of BACT and in-depth broad evaluations are more than implied:

"The PSD program preserve local air quality and protecting areas of special value by reviewing PSD application to ensure the requirement to apply Best Available Control Technology and that they comply with NAAQS, the applicable PSD increment concentrations, as well as evaluating visibility impacts, energy and environmental impact, soils and vegetation impacts and growth impacts.

HAS THERE BEEN A NOTICE OF CONSTRUCTION? HOW ABOUT A AIR QUALITY ANALYSIS?

Prior to Permit issuance, we are to see an Air Quality Analysis. It says here on page 3 of the state PSD guide:

- 3. Conduct an ambient air quality analysis> Each PSD new source or modification of an existing source must perform an air quality analysis to demonstrate that its new pollutant emissions would not violate either applicable NAAQS of the applicable PSD increment."
- 2.2.1.2 Quantify the new source's portents to emit (PTE).

SEPA: THIS IS REQUIRED, WHERE IS IT?

Synthetic Minor Permit is being written because we are now a Major Source subject to the PSD rules. There has never been a SEPA completed for the facility as such.

"3.1.2. State Environmental Policy ACt
All applicant are required to comply with the State Environmental
Policy Act (SEPA). Typically, the SEPA "led agency" is the local
government with land-use jurisdiction where the source is located."

CONTENTS OF PSD APPLICATION: THESE THINGS ARE NOT POSTED FOR REVIEW PRIOR TO THE HEARING: THESE SHOULD BE IN THE PACKET

Beginning on page 29 of Ecology's guideline is a section on what should be in the application. I believe the public hearing should be postponed until all of the materials are included in the application including item #3:

"5.) For each emission control system, provide the make and model of the device, the contol efficiency of the system and required operating parameters. 10.) Description of all emission sampling ports, continuous monitoring systems, and prosed source testing plan.

(Next page)

- 3.1.6 Emission from proposed project:
- 3.) Include all calculations and the basis for all assumptions used in the emission estimates...
- 4.) The applicant should us the most valid data available for the emissions calculations...

3.2.1.6 BACT

BACT only applies to equipment that is new or has been modified...

A. The applicant must provide a "top-down" BACT analysis for each emission unit...

3.2.1.8 Air Quality Impact Analysis (AQIA) "Ecology must determine compliance with NAAQS..."

The applicant must include a discussion of all the assumptions, procedures, and techniques used to estimate the projects's net air quality impacts, and the emissions and meteorological parameters associated tied each.

Where an air quality mode specified in the Guideline on air quality Models is not used or a recommended model is applied outside the recommended limits, the model acceptability for the regulatory application will require written approval from Ecology land/or EPA."

3.2.1.10 Additional Analysis

As required... each applicant must provide an analysis of the process impact on soils, eve Tati on, and visibility, and impact of an general commerical, residential industrial and other frosty associted with the new or modified source..."

There is no Technical Support Document: Hearing Should Be Delayed until this can be reviewed

3.2.2 Draft Permit preparation:

After the application is deemed complete, Ecology prepares a draft and a technical support document (TSD).

APPEALS OF SYNTHETIC PERMIT / RO-52 GO TO THE PCHB AFTER ISSUANCE OF SEPA: SEPA is supposed to be done before the permit is issued. All appeals are to be made in Washington to the Pollution Controls Hearing Board:

3.2.5 Permit appeals

The final PSD permit, or and conditions containe in it, may be appeal to:

The Pollutin Cntrol Hearings Board (PCHB) as provide in chapter 43..."

From: Larry McCarter <rdslarry@mac.com>
Sent: Monday, June 9, 2025 5:18 PM

To: Agata McIntyre

Cc: Kim J Lund; Robert Mittendorf; RSHOWALTER@bellinghamherald.com; Julia;

torilehman.thefront@gmail.com

Subject: RO-52: Bellingham 2012 Consultant Documents Over-Capacity Issues: Deny this permit!

June 9, 2025

Agata McIntyre NWCAA

Larry McCarter 212 Hawthorn Road Bellingham, WA

RE: RO-52. CO is the result of over-feeding MHF's: City knew of over capacity in 2012. Deny this permit.

Larry M.

Biosolids-Business-Case-Evaluation-Report-CDM-Final-Dec-12.pdf drive.google.com





Section 3 • Existing Biosolids Facility

Year		Incinerator 1	Incinerator 2
	Dry lb/yr	8,016,000	503,000
	Dry tons/yr	4,010	250
	Avg Feed Rate, Dry lb/hr	1,480	1,410
	Total Gas Usage, Cuft/yr	7,071,000	1,253,000
	Standby Gas Usage ² , Cuft/yr	2,300,000	667,000
	Standby Gas as % of Total Gas ³	33%	53%
	Solids Processing Gas per Dry Ton, Cuft/ton	1,190	2,340
2011	Operating Hrs ¹	4,948	1,118
	Sludge Burned		
	Dry lb/yr	7,341,000	1,314,000
	Dry tons/yr	3,670	660
	Avg Feed Rate, Dry lb/hr	1,480	1,170
	Total Gas Usage, Cuft/yr	6,522,000	2,959,000
	Standby Gas Usage ² , Cuft/yr	2,136,000	1,150,000
	Standby Gas as % of Total Gas ³	33%	39%
	Solids Processing Gas per Dry Ton, Cuft/ton	1,200	2,740

Notes:

- 1. Operating hours are hours of sludge burning; standby hours are not included.
- 2. Standby gas usage is required to maintain incinerator in hot standby mode.
- 3. Solids processing gas per dry ton is the total gas minus the standby gas divided by the dry tons

Incineration is the primary means of biosolids disposal at the Post Point Plant a capable of reliably handling the 2035 sludge loads. As indicated by the 2006 to illustrated in **Figure 3-5**, current average annual loads already exceed the capable exceed the capacity of the maximum design capacity of both MHFs. The P

From: Larry McCarter < rdslarry@mac.com>
Sent: Monday, June 9, 2025 5:07 PM

To: Agata McIntyre

Cc: Kim J Lund; Robert Mittendorf; RSHOWALTER@bellinghamherald.com; Julia; Michael A Olinger

Subject: RO-52: City has known since 2010 of CO monitoring; It is too late! Deny the Permit.

June 9, 2025

Agata McIntyre NWCAA

Larry McCarter 212 Hawthorn Road Bellingham, WA

RE: RO-52 Comment: City has known since 2010 of non-compliance, Enforcement Fines should be commiserate with avoided costs.

Hello,

Below, attached is a copy of a 2010 consultants report evaluating the pending air rules changes that will cost the city money to upgrade. The city never complied and never spent the money and is only now talking about a 4-5 year plan to come into compliance. This order is complicit in a scheme to endlessly delay, fake litigate, and otherwise stall the attainment of best air controls available.

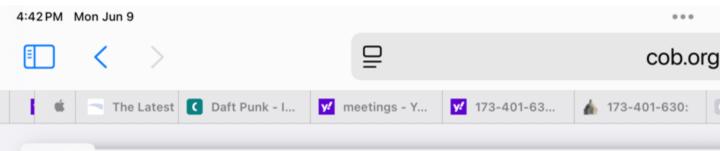
It is improper and unprotective and will cause harm and deterioration of our environment if NWCAA continues to aid and abet the ongoing planned and intentional non-compliance the city demonstrates. This report show the city knows the equipment is deficient, will not meet the almost ratified 2011 amendments and yet nothing has been done, including not getting a permit that complied with the 2011 rules.

CAA law spell out fines are to correlate directly with the avoided costs. Granting this order is the opposite of enforcement. There should be fine ordered for everyday operating with or without a new CO monitor because of the failure to produce an approvable monitoring plan in 2016.

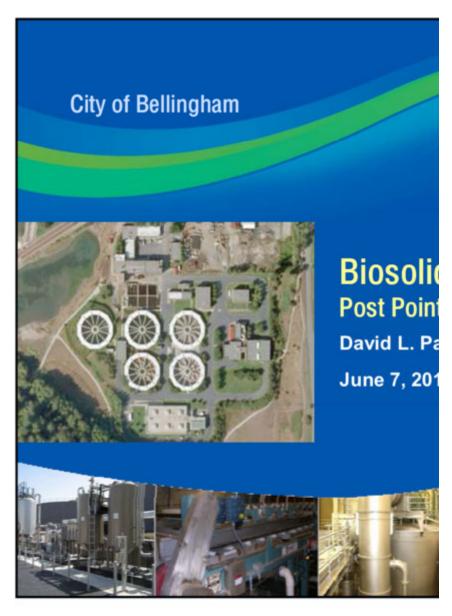
Please deny the permit and demand compliance.

Larry McCarter 212 Hawthorn Rd Bellingham, WA





1 of 14



4:42 PM Mon Jun 9 cob.org

Operator Friendry provide proven reliable, flexible system that are operator and maintenance friendly, support wastewater treatmen operations

Solids Handling at the Po

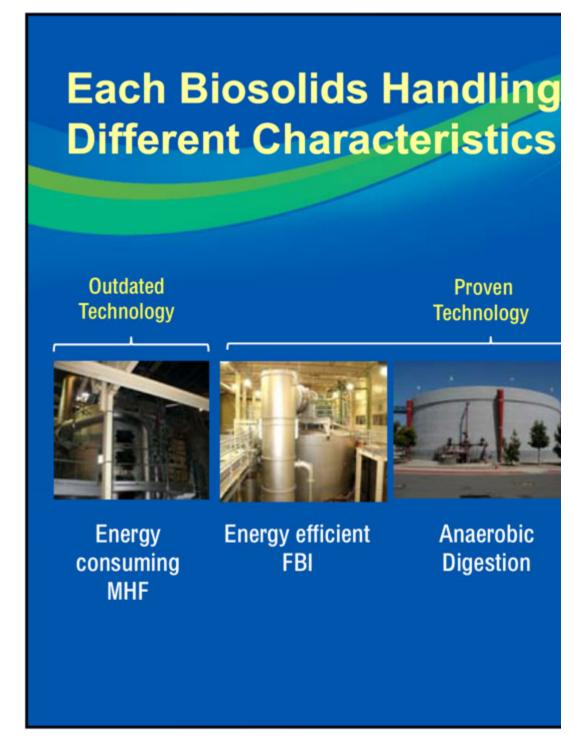
- Thickening equipment is cu
- Reliable solids handling has wastewater treatment in the
- Currently wastewater treatm impacted from 5 day multip
- Aging multiple hearth furna than producing energy, requ maintenance, have limited r require upgrades to meet pe regulations

Gravity Belk
Thickener
(Installed
Thickening
Thickening
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Thickening

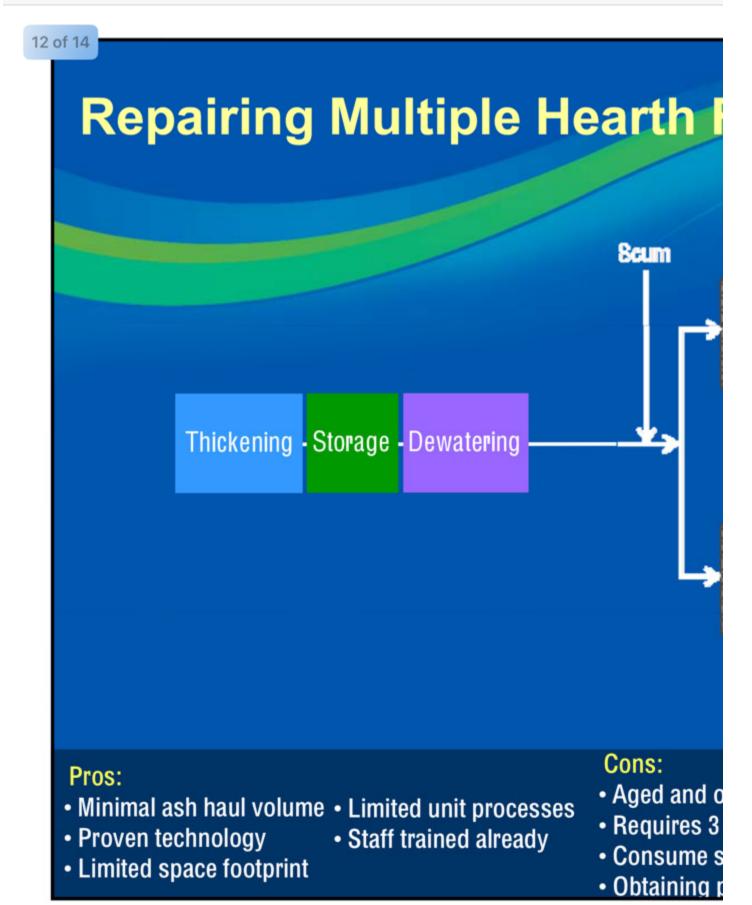
Limitations of Existing Multiple Hearth Furnaces (MHFs)

- Both MHFs are required to meet solids loading requirement
- Require regular repair and maintenance
- Consume significant energy (465 therms natural gas/day)
- No energy recovery on either MF
- Obtaining MHF replacement part is difficult and costly
- Pending air regulations will require costly upgrades

6 of 14



...



From: Larry McCarter <rdslarry@mac.com>
Sent: Monday, June 9, 2025 5:13 AM
To: Agata McIntyre; MengChiu Lim

Subject: R0-52 Comment: WAC 173-401-630 Does Apply and Needs Enforcement Action

Hello and thank you both for working on protecting our planet!

The Post Point WWTP facility is and has been in gross violation of CAA and Washington law including the one I have highlighted here.

I would like to reinforce my notion that WA state does need to act by pointing to WAC 173-401-630 calls out both the permitting agency and the state for enforcement of all permits and laws.

PDF WAC 173-401-630

Compliance requirements.

- (1) General. Consistent with WAC 173-401-615, all chapter 401 permits shall contain comp sufficient to assure compliance with the terms and conditions of the permit. Any document (inc responsible official that meets the requirements of WAC 173-401-520.
- (2) Inspection and entry. Each permit shall contain inspection and entry requirements the required by law, the permittee shall allow the permitting authority or an authorized represental
- (a) Enter upon the permittee's premises where a chapter 401 source is located or emissic conditions of the permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under th
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pol permit; and
- (d) As authorized by WAC 173-400-105 and the FCAA, sample or monitor at reasonable tir permit or applicable requirements.
 - (3) Schedule of compliance. Each permit shall contain a schedule of compliance consister
- (4) Progress reports. For those sources required to have a schedule of compliance, the pe compliance and WAC 173-401-510 (2)(h) to be submitted at least semiannually, or at a more free authority. Such progress reports shall contain the following:
- (a) Dates for achieving the activities, milestones, or compliance required in the schedule achieved; and
 - (b) An explanation of why any dates in the schedule of compliance were not or will not be
- (5) Compliance certification. Each permit shall contain requirements for compliance certification. limitations, standards, or work practices. Permits shall include each of the following:
- (a) A requirement that compliance certifications be submitted once per year. Permitting a for those emission units not in compliance with permit terms and conditions or where more fre
 - (b) In accordance with WAC 173-401-615(1), a means for monitoring the compliance of th
 - (c) A requirement that the compliance certification include the following:
 - (i) The identification of each term or condition of the permit that is the basis of the certifi
 - (ii) The compliance status;
 - (iii) Whether compliance was continuous or intermittent;
 - (iv) The method(s) used for determining the compliance status of the source, currently ar
- (v) If necessary, the owner or operator also shall identify any other material information t FCAA, which prohibits knowingly making a false certification or omitting material information; a
 - (vi) Such other facts as the authority may require to determine the compliance status of t
 - (d) A requirement that all compliance certifications be submitted to the administrator as
 - (e) Such additional requirements as may be specified pursuant to sections 114 (a)(3) and

[Statutory Authority: RCW 70.94.011, 70.94.161, 70.94.162, 70.94.331, and 70.94.510. WSR 16-0. Chapter 70.94 RCW. WSR 93-20-075 (Order 91-68), § 173-401-630, filed 10/4/93, effective 11/4/9

From: Larry McCarter <rdslarry@mac.com>
Sent: Monday, June 9, 2025 5:25 AM

To: Agata McIntyre Cc: Kim J Lund

Subject: R0-52 Should Be Denied due to lack of timely Regulatory Oversight or Enforcement of HPV: 2021

letter describing status of "no permits".

June 9, 2025

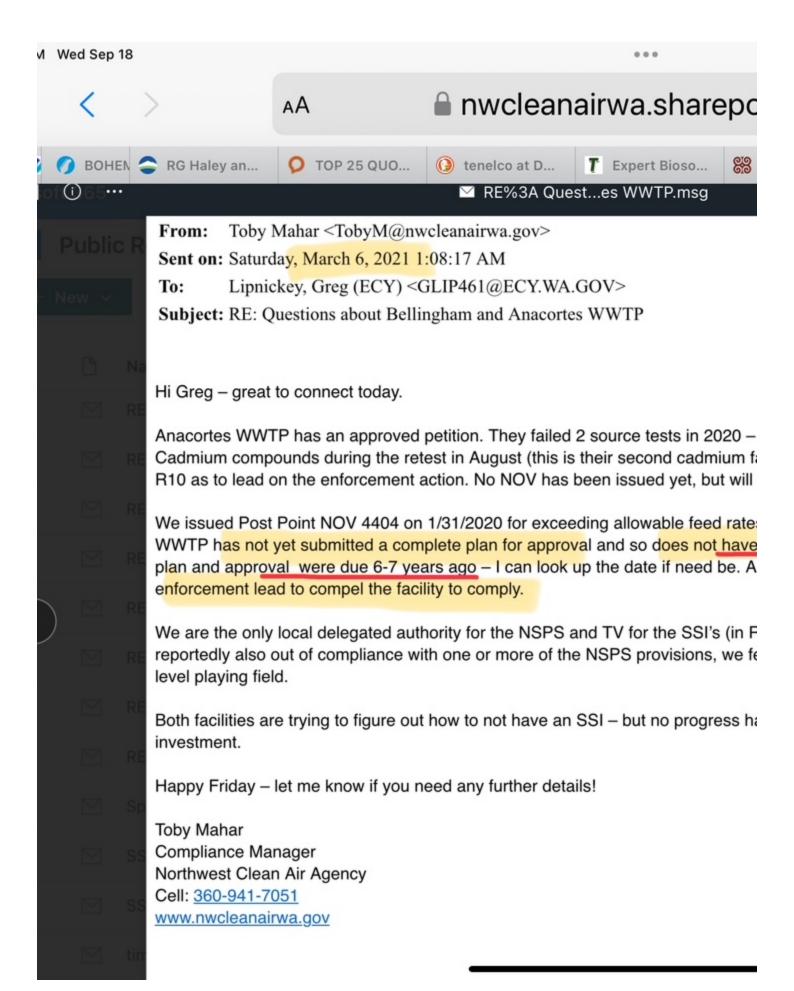
Agata McIntyre NWCAA

Larry McCarter 212 Hawthorn Road

Here is a letter from 2021 between the EPA and NWCAA annunciating that despite an "NOV" issued 1/31/2020 there still was no compliance, including no AOP and they note it was due "6-7 years ago".

Failure to enforce the clean air act is malfeasance of the regulators and issuing this order is a continuance of this failure to meaningfully protect air quality.

This synthetic minor permit should be denied or an condition included, providing for the immediate shutdown if the continuous monitors revealed continued exceedances as they have in the past.



Agata McIntyre

From: Larry McCarter <rdslarry@mac.com>
Sent: Monday, June 9, 2025 2:01 PM

To: Agata McIntyre

Subject: RO-52 Comment: Post Point is Over its Thermal Capacity to Combust.

Attachments: 2207016.pdf

June 9, 2025

Agata McIntyre NWCAA

Larry McCarter 212 Hawthorn Road Bellingham, WA

RE: Order should not be granted due to dilution of hourly infeed monitoring.

Hello,

I am aware and want to clarify that the city follows the Part 503 industry standard of calculating dry tons by sampling and then calculating the residuals after establish "bone-dry" conditions and then figuring the percentage of solids.

This specific "Dry Ton" equation was developed by the Biosolids industry so that the farmer or buyer would know exactly how much soil amendment was being applied. Water content distorts the necessary measurements needed to measure agricultural loading rates.

Incinerators essentially do not care about the percentage of solids -vs- water; Incinerator capacity is a function of the available BTU's that can be transferred to what ever mass is introduced into the burners. The Dry-ton calculations as they have always been done is why we are having a CO problem: over loading putting max rate, plus unmonitored water.

Our Incinerator's have a weight based limit designed to measure only the sludge component of the feedstock. But, the incinerator must expend energy to evaporate which contributes to poor combustion. There are only so many therms in the fuel available to convert or destroy pollutants or water and The large amounts of water certainly consumes the therms which is why the infeed rates must include the weight of water to maintain consistent emissions..

The failure to regulate the quantity of water present in the in-feed rates is not protective of the environment. Technicians need to know the total mass to be destroyed to size the furnace. The Order should include immediately monitoring the actual total weight of the feedstock needing to be combusted and count it towards daily production limits.

L. McCarter

https://apps.ecology.wa.gov/publications/documents/2207016.pdf?utm_source=perplexity

Sent From Larry's IPad.



Biosolids Material Conversion Calculations

Converting between dry and wet tons

Use the following formulas to convert materials from dry tons to gallons or wet tons and vice versa depending on your operations and the units in the questions below.

To convert from wet tons or gallons to dry tons use the following formulas:

Dry tons = Wet tons
$$\times \left(\frac{\text{percent solids}}{100}\right)$$

Dry tons =
$$\left(\frac{\text{gal} \times 8.34}{2000}\right) \times \left(\frac{\text{percent solids}}{100}\right)$$

Note: For septage assume 2% solids

Conversion example: biosolids cake

If you have 32 tons of wet biosolids cake at 16.5% solids, use the first formula above to determine dry tons:

Wet tons
$$\times$$
 %Solids/100 = Dry tons

32 Wet tons
$$\times \left(\frac{16.5}{100}\right)$$
 = Dry tons

5.28 Dry tons

Conversion example: septage

If you have 25,000 gallons of septage, use the second formula above to determine dry tons.

$$\left(\frac{\text{gallons} \times 8.34}{2000}\right) \times \left(\frac{\text{percent solids}}{100}\right) = \text{Dry tons}$$

$$\left(\frac{25,000 \times 8.34}{2000}\right) \times \left(\frac{2}{100}\right) = \text{Dry tons}$$

104.25 Wet tons $\times 0.02$ = Dry tons

2.1 Dry Tons

ADA Accessibility

To request an ADA accommodation, contact Ecology by phone at 360-407-6900 or email at SWMpublications@ecy.wa.gov.or visit https://ecology.wa.gov/accessibility.For Relay Service or TTY call 711 or 877-833-6341

Agata McIntyre

From: Larry McCarter <rdslarry@mac.com>
Sent: Sunday, June 8, 2025 6:21 AM

To: Agata McIntyre

Cc: Kim J Lund; Michael A Olinger; ccmail@cob.org; Hannah E. Stone

Subject: RO-52 Comment: Post Point Is Grossly Over Capacity with Flawed or non-existent Pollutant

Monitoring

June 8, 2025

Agata McIntyre NWCAA

Larry McCarter 212 Hawthorn Road Bellingham, WA 98225

RE:RO-52 Order/Permit is inappropriate: City Reports Indicate Excessive Loading Rates

Hello,

A team of consultants hired by the City of Bellingham determined that at 20% solids the city is incinerating 64,908 pounds of material, which equates to 2,705 pound per hour, which is 1,300 pounds, or almost double the incinerator's capacity. Without undiluted monitoring, NWCAA has no useful data to warrant issuing a permit that allows continued over capacity operation.

The total pounds per hour that are converted from a liquid or solid to a gas is currently twice the rated capacity of either incinerator. These numbers as reported show the facility is well past capacity and has no redundancy of back up plan.

A significant Incinerator "upset" is more likely everyday (service life of incinerators doubled) which will result in overflows of untreated waste into my community's air and the water.

R0-52 is inadequate, inappropriate and should be denied. No facility should be granted a voluntary limit to pollute that violates loading rates continuously and has no redundancy which would lead to a disposal/pollution crisis.

Granting this order permits the city to avoid the cost of compliance which is the opposite of the CAA's mandate to protect, regardless of costs.

The Science and the Law Agree:

An incinerators capacity is thermodynamically determined by balancing a desired rate of combustion of the volatile organics with the rate of water's evaporation with the quantity of water being the real constraint to avoid under-combustion situations. Pounds per hour limits do not change on account of more or less water in any particular column destined for combustion. Our PSD was triggered by poor

combustion which is another clue for us all to know the incineration system in Belligham is over capacity now, and has been falling behind for years now.

"Dry Tons" -vs- "Wet Ton" does not change total weight of infeed rate.

I am aware the City attempts to show compliance of the hourly feed rate based on extracting the water from a sample and then determining concentrations but that control process is not protective of the environment. NWCAA can not rely on any test that was based on diluted sampling of the new or current CEMs. The only valid measurement NWCAA has to judge compliance right now is pounds per hour loaded into the combustion chambers.

This "dry-ton" analysis process may yield a consistent result that indicates normal conditions but for purposes of air quality regulation, it is mis-leading and deficient. Current limits describe an hourly rate for each incinerator. Those must be met. The city has grown and is growing and the problem is only getting worse every day.

Why "historical norms" are useless:

If the emission reports were useful, and conclusive I would not be concerned, but now I know the monitors are and will be incorrectly installed and consequently the facility is not only unmonitored but certainly being over-fed.

Here is the daily in-feed

report: https://drive.google.com/file/d/1HSwZOcPgfxK QuuPqtQu2WaN85DUBjVo/view?usp=drivesdk

-L.M.

5:03 AM Sun Jun 8

Done <

6 of 18

City of Bellingham Biosolids Facility Planning Report: TM 18

Section 2: Class A Dewatere

This section details information on the Class A d

2.1 Class A Dewatered Cake Flo

The average annual production of Class A biosol subsequently dewatered to 20 percent total soli 2025 and 55 WTPD in 2045. A detailed summa found in *TM* 16 – Solids Mass Balance and Gree dewatered cake generated from Post Point.

Table 2-1. Solids Lo

Flows and Loads 2025

Sent From Larry's IPad.

Agata McIntyre

From: Larry McCarter <rdslarry@mac.com>
Sent: Monday, June 9, 2025 9:51 AM

To: Agata McIntyre

Cc: Robert Mittendorf; RSHOWALTER@bellinghamherald.com; Julia; Kim J Lund

Subject: RO-52 Comment: Deny the Permit! City's own consultant recommended against this Project in 2018

Agata McIntyre NWCAA

Larry McCarter 212 Hawthorn Road Bellingham, WA

RE:

RO-52 should be denied: City Allocation of \$40M to meet "LLLL" is Critically Wrong

For years now, The city of Bellingham has used the same consultant to steer the sewage solids away from the 50 year old MHF's. Several reports were generated by these consultants designed to demonstrate the reasonableness of Digesting solids instead of incinerating (landfilling option was inexplicably excluded from the analysis).

The report concluded a compliant incinerator with heat recovery would cost \$270M. The minimum was closer to \$200M. The report clarified how an extensive rebuild of the MHF was not feasible due to capacity of the 50 year incinerator. The original furnace was designed for a population of 40,000 people, we now have 91,000 users. The CO is a result of over-loading the facility and so spending money on overloaded incinerators is bad advice.

Capacity, Regulations, Costs all Point Away from MHF Incineration: -2018 B&C

The City has been advised and intends to spend \$40M to add on a variety air controls to attempt compliance but the same advisor told the city seven years ago that compliance can only be achieved by spending upwards of \$200M. Plz include for the record the regulatory and expense breakdowns and executive summary in the Consultant's report attached below.

There is no reasonable expectation Bellingham will be able to timely meet the required BACT rules as stated and described as requirements moving forward with Incineration in the Brown and Caldwell 2018 report attached. Furthermore, the consultant's 2025 compliance cost estimate of \$40M does not correlate with the cost estimates proffered in 2018 of nearly five times the current recommendation.

The City is only budgeting \$40M which is not a reasonable budget number to meet BACT. Consultant states they are not sure the combination of proposed air controls will successfully meet "LLLL".

The other Compliance projects associated with RO-52 are completely underfunded. Timely regulatory compliance is impossible. Given the years of failing to obtain an AOP, and the other High Priority

Violations onsite, these all shape my opinion that the permit should be denied and a shutdown ordered instead.

Larry McCarter

2018 report Brown and Caldwell Incinerator = \$270M.pdf drive.google.com



Bellingham Fluidized Bed Incinerator Concept Plan Tech Memo - Oct 2018



AutoFill can assist with filling out this form.









Executive Summary

The City of Bellingham (City) currently uses mu residual solids recovered from the Post Point V the age of the existing MHFs and the desire to City has initiated investigations into alternative identified anaerobic digestion as the solids sta and commitments. In addition, it was establish an offsite facility to produce a Class A biosolids

Before moving ahead with this anaerobic diges continuing with an incineration-based process approaches. This technical memorandum (TM) of a new fluidized-bed incinerator (FBI) system

The design capacity of the conceptual FBI syst in the first TM (TM 1) prepared for this plannin volume (110,000 gallons [gal]) was available ϵ maximum day dewatered cake sludge feed rat

The City requested similar redundancy to the c capacity were assumed for this conceptual pla future, this capacity rating and redundancy rec

Predicted emissions from the FBI system, base facilities, require treatment to meet the Clean limits are typically the most stringent and comtechnology (MACT) limits. Air pollution control (requirements, and the existing Clean Water Ac following:

- Nitrogen oxide (NO_x) ammonia or urea-bas
- Multiple-venturi wet scrubber for particula
- Wet electrostatic precipitator (WESP) for P
- Granular activated carbon (GAC) for mercu (PCDDs) and polychlorinated dibenzofuran

Based on the projected dewatered sludge chargenerates about 500 pounds per hour (lb/hr) and WESP. The conceptual plan assumes that dewatered to 50 percent solids on a belt filter facilities are looking at beneficial reuse applications phosphorus fertilizer applications. The City ind

Regulation	Parameter	Unit	Limit Value	
	Particulate matter	lb/dry ton sludge burned	1.3	В
	Beryllium	lb/d emitted	0.022	В
	Mercury	lb/d emitted	7.1	В
Clean Water Act	Arsenic	mg/kg dry cake	1,425	
	Cadmium	mg/kg dry cake	4,439	,
	Chromium	mg/kg dry cake	4,552	Ba
	Lead	mg/kg dry cake	45,461	
	Nickel	mg/kg dry cake	144,470	
	Particulate matter	mg/dscm at 7% O ₂	9.6	
	Carbon monoxide	ppm _{vd} at 7% O ₂	27	
	Nitrogen oxides	ppm _{vd} at 7% O ₂	30	
	Sulfur dioxide	ppm _{vd} at 7% O ₂	5.3	
Clean Air Act	Cadmium	mg/dscm at 7% O ₂	0.0011	
Cicali Ali Act	Hydrochloric acid	ppm _{vd} at 7% O ₂	0.24	
	Mercury	mg/dscm at 7% O ₂	0.001	
	Lead	mg/dscm at 7% O ₂	0.00062	
	Dioxins/furans (toxic equivalency)	ng/dscm at 7% O ₂	0.013	
	Dioxins/furans (total mass)	ng/dscm at 7% O ₂	0.0044	
	Particulate matter	Grains/dscf at 7% O ₂	0.02	E
NWCAA	Visible emissions	Percent opacity (6- minute average)	5	E

Since the inception of the MACT emissions regulations only one domestic FBI has been of under the emissions limits. That FBI meets all MACT requirements. A second FBI installaunder construction with possible testing in summer 2018. These two facilities carried pe guarantees from the supplier and construction of an FBI at Post Point would include the

In addition to air permitting, biosolids management permitting with the Washington State Ecology (Ecology) would be needed for a new incineration facility. Informal communication Ecology has indicated that it would be resistant to permitting a new incineration facility. biosolids rule in Washington Administrative Code (WAC) 173-380 encouraging "the maxi of historide " which is defined as "the application of historide to the land for the purpose

Lead	• •	35	
Nickel		34	

a. Maximum value reported from January 2012 to March 2018.

2.2 Regulatory Limitations

The NWCAA would have regulatory jurisdiction over the FBI at Post Point. Two key processing limits and emissions requirements discussed here. Emissions limits storegulations, including the Clean Water Act and Clean Air Act. The most recent fede sewage sludge incinerators revised the Clean Air Act to apply maximum achievable (MACT) emissions limits. The expected permit limits are summarized in Table 2-5. requires a new air permit, which may result in changes to some of the parameters the cake concentration limits listed in the Clean Water Act section and both NWCA and B include the existing MHF permits for reference.



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Bellingham Fluidized Bed Incinerator Concept Plan TM

Fluidized-Bed Incinerator Conceptual Plan

Regulation	Parameter	Unit	Limit Valu
	Particulate matter	lb/dry ton sludge burned	1.3
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	Chromium	mg/kg dry cake	4,552
	Lead	mg/kg dry cake	45,461
	Nickel	mg/kg dry cake	144,470
	Particulate matter	mg/dscm at 7% O ₂	9.6
	Carbon monoxide	ppm _{vd} at 7% O ₂	27

X

2.1.3 Volatile Solids

Related work on this project identified a range of VS contesimplicity, this conceptual design applied a median value

2.1.4 Heating Value

For planning-level efforts typical heating values of the sludetailed design purposes the City should compile any hist (minimum one sample per month) over several years to e years of data would provide a good data set covering seas

In the absence of a robust data set this analysis used type Federation (WEF) (1992), 10,800 British thermal units per primary sludge and 9,700 Btu/lb VS for raw secondary slub based on the projected loads. The heating values listed per heat of water vaporization produced during combustion is conservative value of 10,350 Btu/lb VS.

Table 2-2. Estimated Slu		
	2	2025
Parameter	Average	Maxim
Raw primary sludge volatile solids (lb/d)	24,400	49,
Raw secondary sludge volatile solids (lb/d)	16,200	29,
Combined heating value ^a	10,360	10,

Applies 10,800 Btu/lb VS for raw primary sludge and 9,7 based on the weighted average of combined raw primary

2.1.5 Ultimate Sludge Composition

Like the heating value estimate, this analysis applied typi



Figure 3-1. FBI capacity and thickened sludge

The design 36 dtpd feed rate and cake characteristics establis materials balance around the incinerator and primary heat exc provide heated combustion air to avoid auxiliary fuel consumpt assumptions applied in development of the heat and materials

- Ambient air temperature of 60 degrees Fahrenheit (°F) wit
- 40 percent excess air above that required for stoichiometr



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Bellingham Fluidized Bed Incinerator Co

Fluidized-Bed Incinerator Conceptual Plan

- FBI outlet temperature of 1,550°F
- Combustion air preheat temperature of 1,100°F
- Bed temperatures ranging from 1,350°F to 1,450°F
- 20 percent of VS combustion above the sand bed (freeboa
- Purge air blower supplies 400 standard cubic feet per min

Figure 3-B shows the results of the heat and materials balance

compartments of the WESP and requires a 15 kW air heater to prevent condensation build Intermittent wash water requires approximately 60 gpm while operating.

3.3.3 Mercury Removal

The wet scrubber and WESP will remove some Hg, but the stringent MACT requires addition Currently, two technologies dominate the sewage sludge industry. The historically applied g carbon (GAC) vessel provides a high removal efficiency for reliable performance. An alterna uses a proprietary adsorbing polymer composite material that adsorbs Hg and SO₂ (to a les far, this technology has been successfully applied at facilities operating under the less strir MACT limits, but the supplier will now provide a performance guarantee to meet the "new" While the media does require periodic replacement, like the GAC, the technology is simpler affordable.

This analysis will include a Hg removal device and assumes the GAC system for reliable and performance. If the City desires to avoid the higher capital and operating costs, the simpler composite technology can be reconsidered.

The GAC requires an approximately 1,000-square-foot (ft²) footprint including a 12-foot-dia 20-foot-tall carbon vessel plus a gas conditioning system, which increases the flue gas tem the saturation point.

3.3.4 Nitrogen Oxide Control

Combustion processes generate oxides of nitrogen (NO_x). NO_x includes nitrogen oxide (NO) dioxide (NO₂). Most of the NO_x measured in the stack consists of NO as the wet scrubber re readily removes NO₂. NO_x emissions are not easily predicted and depend on the N present temperature, and O levels in the FBI. This analysis reviewed stack testing data on existing F William County Service Authority's H.L. Mooney Advanced Water Reclamation Facility (Wood the Northeast Ohio Regional Sanitary District Southerly Wastewater Treatment Center (Cleve the Metropolitan Environmental Services Metro WWTP (St. Paul, Minnesota). Typical values to 40 parts per million by volume dry (ppm_{vd}) corrected to 7 percent oxygen.

To reliably achieve the MACT NO_x of 30 ppm_{vd} corrected to 7 percent oxygen, a select non-ctechnology will be required. This typically involves injection of an ammonia or urea solution at the outlet of the FBI that reacts with NO_x to form benign N gas.

This analysis used a raw NO_x concentration of 40 ppm_{vd} corrected to 7 percent oxygen for c estimate the control demands. A 19 percent strength ammonia solution applied at a 3:1 ar molar ratio with a 40 percent removal efficiency resulted in a 30 gpd demand at flue gas concentration a 23 ppm_{vd} corrected to 7 percent oxygen, or 77 percent of the MACT limit.

A 4 ft³ tote would provide 15 days of storage at the 36 dtpd cake feed rate. Small metering carrier water system encompass the other equipment required.



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Bellingham Fluidized Bed Incinerator Concept Plan TM

Fluidized-Bed Incinerator Conceptual Plan

3.3.5 Carbon Monoxide Control

Like NO_x, carbon monoxide (CO) emissions cannot easily be predicted. The same three faci for the expected NO_x emission also collected CO data. The results of several stack tests rar 19 ppm_{vd} corrected to 7 percent oxygen, well below the MACT limit. One of the advantages technology over an MHF is the more efficient and complete combustion, resulting in low CC



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Bellingham Fluidized Bed Incinerator Concept Plan TM

Fluidized-Bed Incinerator Conceptual Plan

Section 5: Supporting Systems

Many other systems at Post Point will support the FBI system. The sludge thickening, cake pumping system are critical to the FBI operations. The following sections discuss the existing improvements included as part of this analysis.

5.1 Thickening and Storage

Post Point currently operates two GBTs to co-thicken primary and secondary sludge prior to this conceptual design these units would be replaced with two new GBTs with the same dethose used for the anaerobic digestion alternative.

The existing thickened sludge storage provides 110,000 gallons of storage. As discussed b incineration facility would be constructed in the currently open area to the east of the admi building. This conceptual design assumes that the thickening facilities are also located in t includes construction of new thickened sludge storage. This conceptual design also assum thickened sludge storage volume remains at 110,000 gallons. If the City ultimately decides incineration, reusing the existing GBTs, GBT building space, and thickened sludge storage t considered.

5.2 Dewatering

Post Point installed two new Alfa Laval G2-95 centrifuges around 2010. Each of those unit: 30 dtpd. An older Sharples DS-705 is also available with a capacity of 28 dtpd. The newer expected to have remaining service life when the FBI system would be installed (~2025). T assumptions used in the digestion evaluation, this evaluation assumes that two new 36 dt installed and housed in a new facility to the east of the administration building in the currel

5.3 Cake Pumping

The age of the existing Schwing cake pumps is not known, but this analysis assumes that t replacement when the FBI installation takes place (~2025). Two new units rated for 36 dtp. Also, two 800 ft3 bins provide limited storage, assumed 4 hours at 36 dptd processing rate the pumps. The new cake/bins pumps would be located underneath the centrifuges in the facility.

Section 6: Conceptual Layout and Costs

Based on the findings and recommendations of the previous sections, this analysis develop layouts and costs for the FBI system. The analysis included two alternatives, with and with: steam turbine generator system.

× 2018 report Brown and Caldwell Incinerator = \$270M.pdf



Figure ES- 2. WHB alternative

This conceptual plan developed an opinion of probable cost summarizes the cost for each. These costs do not include a use. Ash treatment technologies are just becoming commer



2

Bellingham Fluidized Bed Incinerat

Fluidized-Bed Incinerator Conceptual Plan

represent the first United States installation. As a result the costs, ranging from minimal costs if the ash is landfilled or a for fertilizer application to several million dollars if complex

Table ES- 1. Cons	truction Cost Estimates for Incin
Alternative	
Base	
Waste heat boiler	

The conceptual planning effort also produced a life-cycle co of a 20-year analysis.

Table ES- 2. Life Cycle Cost Estimates for Incir		
Item	Bas	
Capital costs	\$1	
Labor and materials	\$3	
Utilities and chemicals	\$	
Ash disposal	\$	

× 2018 report Brown and Caldwell Incinerator = \$270M.pdf



Suite 1200 Seattle, WA 98101

T: 206.624.0100 F: 206.749.2200

Prepared for: City of Bellingham Public Works Department

Project title: Post Point Biosolids Planning

Project no.: 150048.220.223

Technical Memorandum 2

Subject: Fluidized-Bed Incinerator Conceptual Plan

Date: October 29, 2018

To: Robert W. Johnson, Superintendent of Plants

From: Tadd Giesbrecht, P.E., Brown and Caldwell Pr

Copy to: Brian Matson, P.E., Carollo Senior Vice Presic

Prepared by:

Lloyd Winchell, Process Engineer, License 55

Reviewed by:

Joey Cheng, Principal Engineer

A. IVanil

Sent From Larry's IPad.

Agata McIntyre

From: Larry McCarter <rdslarry@mac.com>
Sent: Saturday, June 7, 2025 9:06 PM

To: Agata McIntyre

Subject: RO-52 Comment: Installed Monitor is not sensitive enough.

Agata McIntyre NWCAA

Larry McCarter 212 Hawthorn Rd. Bellingham, WA

RE: Monitor Sensitivity must be adequate.

I have no way of verifying the actual sensitivity of what monitor has been installed; I want to comment that the proposed CEM would not meet the sensitivity requirements to determine compliance with Violation #3 or even #1 of the NOV.

I have attached the proposed sensor system's specification as well as highlighted what appears to be the limit of 80 PPM. I believe the "LLLL" requires detection down to 17 ppm. I also believe PSD co compliance is more stringent than the 17ppm.

Additionally, adjacent to the CO monitors, simultaneous Oxygen readings are supposed to occur and again, I do not see those sensors designed into this system. Oxygen percentages vary with Major Source generators so I am not sure what it is, but 11% seems high.

This is a link to the sensor system's specification:

New CO Monitor Specification.pdf drive.google.com

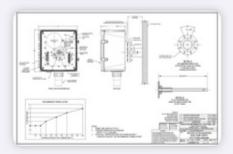


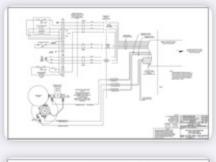
CEMS_Assembled_Drawings_2025-01-30











	- Anna Salata Sa	THE REAL PROPERTY.
-	TEXASON MARKET M	-

DAILY CALIBRATION GAS			
CYLINDER (SEE NOTE 1)	GAS		
DAILY: ZERO	N2		
DAILY : SPAN 1	CO - LOW		
	O2		
DAILY : SPAN 2	CO - HIGH		

LINEARITY/CGA TEST GAS			
POINT			
MID (50 - 60%)	SPAN 1		
LOW (20 - 30%)			
MID (50 - 60%)	ODANIO		
LOW (20 - 30%)	SPAN 2		

Expand Table





For the air pollutant	You must meet this emission limitation ²	Us
	per dry	OŤ
	standard	cu
	cubic	
	meter	
Carbon monoxide	17 parts per million dry volume	3-r mi tin

Sent From Larry's IPad.

June 7, 2025 Agata McIntyre NWCAA

Larry McCarter 212 Hawthorn road Bellingham, WA

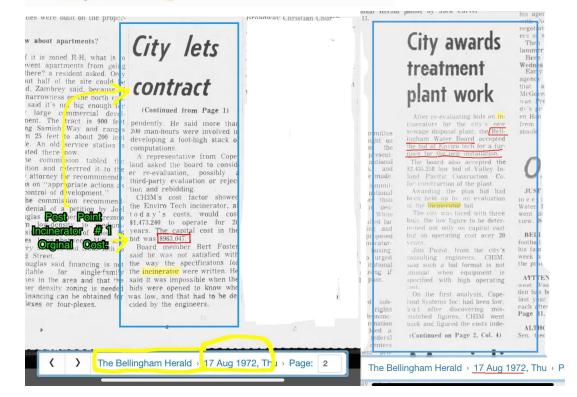
RE: RO-52 City has

In September of 2024 city of Bellingham self-reported exceeding the speakeds defined for existing units constructed before 2011. The regulations are not ambiguous regarding how to do the math. The city introduces the proposition that Routine Repair Maint calculation of total capeanses. The City's position that the Enrichy will eventually spead of 50% while installing the upgrades to comply with "LLLI" in demonstrably woman and should not be the basis for finding to enforce "LLLI" immediates!" and the spead of the speaked in the speaked in the speaked of the speaked in t

Modification means a change to an existing SSI unit later than September 21, 2011 and that meets one of two criteria:

- (1) The cumulative cost of the changes over the life of the unit exceeds 50-percent of the original cost of building and installing the SSI unit (not including the cost of land) updated to current costs (current dollars). To determine what systems are within the boundary of the SSI unit used to calculate these costs, see the definition of SSI unit.
- (2) Any physical change in the Sal unit or change in the method of operating it that increase the amount of any air pollutant emitted for which section 12 or section 111 of the Clean Air Act has established standards.

Modified sewage sludge incineration unit means an existing SSI unit that undergoes a modification, as defined in this section.





CERTIFICATE OF COMPLETION

Project Name:

IDIQ Multiple Hearth Incinerator Repair - MHF2

Project No.:

13B-2020

Prime Contractor:

Industrial Furnace

Subcontractors:

See Attached List if applicable

Date Work Began:

03/13/2022

Date Work Completed:

04/10/2022

Final Amount:

110,223.23 plus WSST:

9,589.43

CONTRACTOR'S CERTIFICATION

I, the undersigned, certify that I am authorized to sign for the claimant; that the attached Final Estimate is a true and correct statement showing all the monies due me from the City of Bellingham under this contract; that I have carefully examined said Final Estimate and understand the same; and that I hereby release the City of Bellingham from any and all claims of any nature which I may have arising out of the performance of



Purchasing Office 2221 Pacific Street Bellingham, WA 98229 (360) 778-7750 Fax: (360) 778-7706 purchasing@cob.org

PURCHASE ORI C210073 Page 1

THIS PURCHASE ORDER NUMBER MUST APPEAR ON ALL PACKAGES AND PAPERS RELATING TO THIS PURCHASE.

TO: Industrial Furnace Co Inc 40 Humboldt St Rochester, NY 14609

BUYER:

Purchasing Dept purchasing@cob.org 360-778-7750

INVOICE TO:	City of Bellingham
	Finance Department
	210 Lottie Street
	BELLINGHAM, WA 98225
SHIP TO:	City of Bellingham
	Finance Department
	210 Lottie Street
	BELLINGHAM, WA 98225

EQUISITIO	N DATE	ACCOU	NT TERMS	REQUIRED DATE	CONTRACT REF	F.O.B. PC	INT
08/03/2	021			08/01/2021		FOB Desti	ination
LINE	QTY	UNIT	DESCRIPTION	OF GOODS / SERVICES	1	UNIT PRICE	EXTE
00001	1.00	EA	MHF2 Burner I	nstallation		\$137,068.27	
			-		Tax		
					Purchase Order Total		

Internal document for tracking purpose only. This is not a contract.

For terms and conditions, please reference contract C2100736



Purchasing Office 2221 Pacific Street Bellingham, WA 98229 (360) 778-7750 Fax: (360) 778-7706 purchasing@cob.org

PURCHASE ORDER N						
C2200073						
Page 1						

THIS PURCHASE ORDER NUMBER MUST APPEAR ON ALL PACKAGES AND PAPERS RELATING TO THIS PURCHASE.

TO: JT Thorpe & Son Inc 1132 South 500 West SALT LAKE CITY, UT 84101

BUYER:

Purchasing Dept purchasing@cob.org 360-778-7750

INVOICE TO:	City of Bellingham
	Finance Department
	210 Lottie Street
	BELLINGHAM, WA 98225
SHIP TO:	City of Bellingham
	Finance Department
	210 Lottie Street
	BELLINGHAM, WA 98225

01/18/2022 LINE QTY 0001 1.00		01/19/2022 N OF GOODS / SERVICES		FOB Dest	ination
		OF COODE / SERVICES		FOB Destination	
0001 1.00		OF GOODS / SERVICES		UNIT PRICE	EXTENDED PRIC
	EA IDIQ Incinera	tor Repairs - January 2022		\$20,996.96	\$20,996.5
			Tax Purchase Order Total		\$1,847.7 \$22,844.6

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For terms and conditions, please reference contract C2200073



Purchasing Office 2221 Pacific Street Bellingham, WA 98229 (360) 778-7750 Fax: (360) 778-7706 purchasing@cob.org

PURCHASE (ORDER NO.					
C2200597						
Page	1					

THIS PURCHASE ORDER NUMBER MUST APPEAR ON ALL PACKAGES AND PAPERS RELATING TO THIS PURCHASE.

TO: JT Thorpe & Son Inc 1132 South 500 West SALT LAKE CITY, UT 84101

BUYER:

Purchasing Dept purchasing@cob.org 360-778-7750

INVOICE TO:	Cmbill Default Id - TBD
SHIP TO:	City of Bellingham Finance Department 210 Lottie Street BELLINGHAM, WA 98225

REQUISITION	ON DATE	ACCOU	NT TERMS	REQUIRED DATE	CONTRACT REF	F.O.B. P0	OINT
06/14/	/2022			07/01/2022		FOB Dest	tination
LINE	QTY	UNIT	DESCRIPTION	OF GOODS / SERVICES		UNIT PRICE	EXTENDED PRIC
0001	1.00	EA	Incin #2 Heart	th repairs - JT THORPE IDIQ		\$635,800.01	\$635,800.0
0002	1.00	EA	Supplemental	Hearth cleaning		\$6,968.56	\$6,968.5
					_		
					Tax Purchase Order Total		\$642,768.5
					Purchase Order Total		\$642,768

Internal document for tracking purpose only. This is not a contract.

For terms and conditions, please reference contract C2200597

City of Bellingham
Purchase Order - Terms and Conditions

The following terms and conditions are agreed to by the Supplier ("Seller") whose name appears on the face of this Purchase Order and the City of Bellingham ("City"). Seller hereby acknowledges and agrees that these terms and conditions shall apply and are hereby

at Oct 8			***					all 🗢 919
	Asset	97968_Incine	erator1_S	tack_Cap	_Damper		Q	(A)
1	,	FIX	CITY OF BELL		,	F	OLICY: FIN 09.	00.0 7
1	97968 Component # GT #	Yes Yes	No S	STLIFE ST	DATE DATA		F/A ACCT INITIA	
E .	Condition: Constructed Donated New Status: Cop Non-Dep Cap Non-Dep No	La Maria Com	Please attach	copy of inv	oice to ass	et form_		ALPHA
100	DATE IN SERVICE AP	CREDIT CARD	USER ACCOUNT	CODE (Not Job C	Cost Code)	GRANT PURCHASE	WAREHOUSE PL	
2	12/1/06 XYes No	Yes X No	420 5 6			Yes No ENTER GRANT INFO BELOW	Yes [
	ASSET DESCRIPTION	e #1 STACK	CAP D	AMPER	AND INS	TALLATION	TOTAL ASS	ET COST
1		L#		SERIAL#			96,38	7.46
	VENDOR NAME: IMAC, INC.							
			LOCATION INFO		-	20	111	
4	PHYSICAL LOCATION		16	FUND NAME	4 .	24		36
	BUILDING		1616	DEPARTMEN	n o	uf	6	46
	EXPANDED LOCATION DESCRIPTION			_				
	TYPE OF ASSET				PURCHASE INFO		_	
1		*Theft Sensitive					State or	Federal
		Machine & Equipment		Grant Agen	ncy		Agency 9	
	173 - Other Improvements			Function _	09	Туре	Equipm	ent
	176 - Donations 182 -	/ehicles ***provide VINI			E - 182 VIN #			



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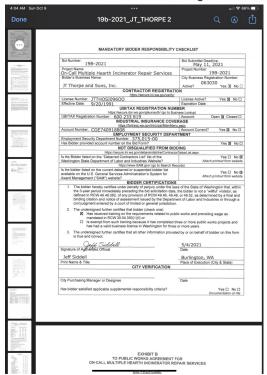
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Purchasing Office 2221 Pacific Street Bellingham, WA 98229 (360) 778-7750 Fax: (360) 778-7706

purchasing@cob.org

PURCHASE ORDE C2001317

Page 1

THIS PURCHASE ORDER NUMBER MUST APPEAR ON ALL PACKAGES AND PAPERS RELATING TO THIS PURCHASE.

TO: Industrial Furnace Co Inc 40 Humboldt St Rochester, NY 14609

BUYER:

Purchasing Dept purchasing@cob.org 360-778-7750

INVOICE TO: City of Bellingham Finance Department 210 Lottie Street BELLINGHAM, WA 98225

SHIP TO:

City of Bellingham Finance Department 210 Lottie Street BELLINGHAM, WA 98225

REQUISIT	TION DATE	ACCOU	NT TERMS	REQUIRED DATE	CONTRACT	REF	F.O.B. F	POINT
12/15,	/2020			12/18/2020			DESTIN	IATION
LINE	QTY	UNIT	DESCRIP	TION OF GOODS / SERVICES			UNIT PRICE	EXTENDE
0001	1.00	EA	Proposal	#1 - I <mark>ncinerator Repairs</mark>	at Post		\$406,397.60	\$406,
1			Point					

are	Contra	ctor: <u>Industrial</u>	erator <mark>Hearth Repair</mark>	anges f	rom the	PO Number: Date: Project#: Contract: contract pla	05/08/2013 65B-2012 2012-0654 ans and
nmary	y Chan						
	Bid tem#		Description	Qty	Unit	Unit Cost	Total Amount
Ť		De-Slag Burners and Point/patch	and Drop Holes from Hearth Hearth 1 & 6 Burner	1	0	\$1,000.00	\$1,000.00
T		Patch Center Sha	ıft Castable	1		\$500.00	\$500.00
		Replace Missing	Castable on Breech Roof	1		\$500.00	\$500.00
		Repair Damaged [rop Hole Leg	1		\$1,000.00	\$1,000.00
		Replace Burner		2		\$2,250.00	\$4,500.00
		Replace Cracked	Rabble Arm on Hearth	1		\$500.00	\$500.00
		•				f Request	\$8,000.00
			8.7% Sale	es Tax Total	- applic	able? ☑	\$696.00 \$8,696.00



Purchasing Office 2221 Pacific Street Bellingham, WA 98229 (360) 778-7750 Fax: (360) 778-7706 purchasing@cob.org

PURCHASE ORDER NO.						
C2200597						
Page	1					

THIS PURCHASE ORDER NUMBER MUST APPEAR ON ALL PACKAGES AND PAPERS RELATING TO THIS PURCHASE.

TO: JT Thorpe & Son Inc 1132 South 500 West SALT LAKE CITY, UT 84101

BUYER:

Purchasing Dept purchasing@cob.org 360-778-7750

INVOICE TO:	City of Bellingham Finance Department 210 Lottie Street BELLINGHAM, WA 98225
SHIP TO:	City of Bellingham
	Finance Department
	210 Lottie Street
	BELLINGHAM, WA 98225

REQUISIT	TION DATE	ACCOUNT TERMS REQUIRE		REQUIRED DATE	CONTRACT REF	F.O.B. Po	DINT
06/1	4/2022			07/01/2022		FOB Dest	ination
LINE	QTY	UNIT	DESCRIPTION	OF GOODS / SERVICES		UNIT PRICE	EXTENDED PRICE
0001	1.00	EA		t <mark>h repairs - JT</mark> THORPE IDIQ t follow contract terms per contract	#C2100808	\$635,800.01	\$635,800.01



Purchasing Office 2221 Pacific Street Bellingham, WA 98229 (360) 778-7750 Fax: (360) 778-7706 purchasing@cob.org

PURCHASE	ORDER NO.
C2200	597
Page	1

THIS PURCHASE ORDER NUMBER MUST APPEAR ON ALL PACKAGES AND PAPERS RELATING TO THIS PURCHASE.

TO: JT Thorpe & Son Inc 1132 South 500 West SALT LAKE CITY, UT 84101

BUYER:

Purchasing Dept purchasing@cob.org 360-778-7750

INVOICE TO:	City of Bellingham
	Finance Department
	210 Lottie Street
	BELLINGHAM, WA 98225
SHIP TO:	City of Bellingham
	Finance Department
	210 Lottie Street
	BELLINGHAM, WA 98225

EQUISITION DATE	ACCOU	NT TERMS	REQUIRED DATE	CONTRACT REF	F.O.B. PO	TAIC	
06/14/2022			07/01/2022		FOB Dest	tination	
INE QT	Y UNIT	DESCRIPTION	OF GOODS / SERVICES		UNIT PRICE	EXT	ENDED PRIC
1.0	O EA	Inclin #2 Hear Invoicing mus	th repairs - IT THORPE IDIQ It follow contract terms per contract	t #C2100808	\$635,800.01		\$635,800.0
				Tax			\$0.0
			_	Purchase Order Total		_	\$635,800.0

Internal document for tracking purpose only. This is not a contract.

For terms and conditions, please reference contract C2100808

City of Bellingham
Purchase Order – Terms and Conditions

Sent From Larry's IPad.

RO-52 Comment: EPA Sensor Location Response based on inaccurate information, EPA acknowledges 30% Dilution Rate, does not acknowledge capacity issues, City's 5-6 year plan to comply would mean super over-capacity situation: Permit should be denied. Friday, June 6, 2025 9:12:34 PM

June 6, 2025

Agata McIntyre NWCAA

Larry McCarter 212 Hawthorn road Bellingham, WA

RE: EPA Sensor Location consideration was based on inaccurate information. EPA estimates Diluted Shaft Air Equals 30% of all sampled air planned or otherwise. Location consideration failed to consider over-

In the records that I have, I see very little communication between NWCAA and the EPA other than consistent referrals to the text of CAA itself. There is this one email that discusses sensor location and in this email is a clue to the amount of dilution is occurring prior to sampling at Post Point.

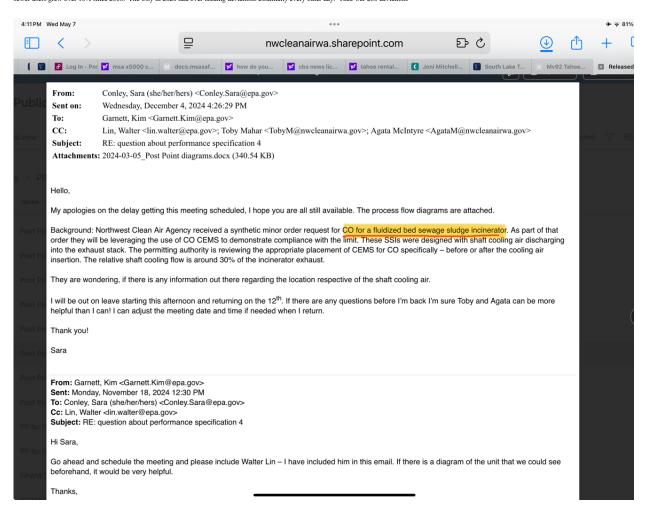
In this one email I note that the description of the type of Incinerator is wrong and that matters as the type of incinerator apparently discussed is not what Bellingham is using nor is the issue of over-capacity raised by

Bellingham's incinerators are not Fluidized Bed Incinerators (FBI) as supposed in the attached email. FBI, due to their superior design are about twice as clean as MHF's running at or above capacity. Knowing the equipment is running at capacity equates to known polluting.

Introducing 30% shaft cooling air invalidates the test results and this letter acknowledges that the dilution is very significant. Standard testing procedure is to locate the sensor near to the equivalent of two times the width of the exhaust gas ducting adjacent to the unit. Oxygen sensors should be co-located as well, with no dilution from outside air. Dilution would require a "dilution testing" plan.

Permitting a sensor for a facility that is already over capacity is improper unillogical.

Excessive CO generation is the result of poor combustion which is typically caused by "over-feeding" the furnace. Bellingham has been running the incinerators over capacity since 2008 all while the population of sewer users grew over 10% since 2008. The City in 2020 had over feeding deviations essentially every other day. Thee wer 200 deviations





Office of Mayor Seth Fleetwood City of Bellingham

RECEIVED

JUL 2 2 2022

NORTHWEST CLEAN AIR AGENCY

July 20, 2022

Mr. Bob Uhrich Northwest Clean Air Agency 1600 South Second Street Mt. Vernon, WA 98273

__Agata___Toby___Matt__

Dear Mr. Uhrich,

During third-party performance testing in September/October 2021 we updated our pollution control device operating limitations while obtaining acceptable stack gas emissions per Table 2 to Subpart LLL in 40 Code of Federal Regulations (CFR) 62 LLL. The enclosed Deviation Report details those times the City of Bellingham was unable to meet these air pollution control device limitations derived during our September/October 2021 stack testing. The deviations reported here are from January 1 to June 30, 2022.

Reasons for not meeting the control device limitations are annotated and described. Hourly data is also provided for those dates where deviations occur to meet the requirements detailed in 40 CFR 62.16030(d)(4)(iii)-(vi).

We are submitting this biannual Deviations Report to comply with all reporting requirements of 40 CFR 62.16030(c). Our next biannual Deviations Report will be included in the City of Bellingham's annual report submitted to your attention in early 2023.

The City of Bellingham is under contract to eliminate sewage sludge incineration and continues to move towards a technologic approach that emphasizes resource recovery in biosolids processing. We are working closely with the Washington Department of Ecology during this process change and will keep your agency informed about the date of permanent incinerator shutdown as this occasion nears.

I certify the accuracy of the submitted data as a responsible official of the City of Bellingham.

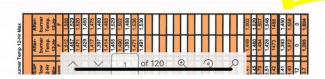
Mayor

Enclosure [1] Deviation Report

2 0 0

"Capacity Deviations"?

Office: (360) 778-8100 | Fax: (360) 778-8101 | Email: mayorsoffice@cob.org | www.cob.org/mayor 210 Lottle Street, Bellingham WA 98225



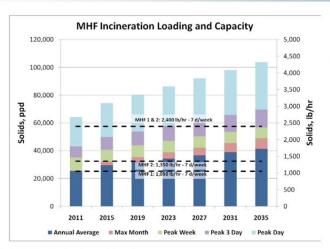


Figure 3-5. Existing Incineration Loading and Capacity

Other observations from ${\bf Figure~3-5}$ include the following:

- The larger of the two incinerators (MHF 2) has enough capacity to handle annual average solids loading until between 2019 and 2021, as opposed to 2015 with the earlier projection.
- With both incinerators operating (MHFs 1 & 2) the plant can handle the peak week solids loading for the entire planning period until 2035.
- With both incinerators operating (MHF1 & 2) the plant can handle the peak three day solids loading until 2024 as opposed to 2016 with earlier projection. However, this provides no redundancy in the operations.





2012: INCINERATORS Section 3 • Existing Biosolids Facility "...ALREADY EXCEEDS CAPACITY..."

Year		Incinerator 1	Incinerator 2	Total
	Dry lb/yr	8,016,000	503,000	8,519,000
	Dry tons/yr	4,010	250	4,260
	Avg Feed Rate, Dry lb/hr	1,480	1,410	
	Total Gas Usage, Cuft/yr	7,071,000	1,253,000	8,324,000
	Standby Gas Usage ² , Cuft/yr	2,300,000	667,000	2,967,000
	Standby Gas as % of Total Gas ³	33%	53%	36%
	Solids Processing Gas per Dry Ton, Cuft/ton	1,190	2,340	1,260
2011	Operating Hrs ¹	4,948	1,118	6,066
	Sludge Burned			
	Dry lb/yr	7,341,000	1,314,000	8,655,000
	Dry tons/yr	3,670	660	4,330
	Avg Feed Rate, Dry lb/hr	1,480	1,170	
	Total Gas Usage, Cuft/yr	6,522,000	2,959,000	9,481,000
	Standby Gas Usage ² , Cuft/yr	2,136,000	1,150,000	3,286,000
	Standby Gas as % of Total Gas ³	33%	39%	35%
	Solids Processing Gas per Dry Ton, Cuft/ton	1,200	2,740	1,430

Notes:

- 1. Operating hours are hours of sludge burning; standby hours are not included.
- 2. Standby gas usage is required to maintain incinerator in hot standby mode.
- 3. Solids processing gas per dry ton is the total gas minus the standby gas divided by the dry tons of sludge burned.

<u>Incineration</u> is the primary means of biosolids disposal at the Post Point Plant and thus it must be capable of reliably handling the 2035 sludge loads. As indicated by the 2006 to 2011 data and illustrated in Figure 3-5, current average annual loads already exceed the capacity of MHF 1 and peak loads exceed the capacity of the maximum design capacity of both MHFs. The Post Point Plant is only able to continue operating in this manner by operating the MHFs above their design rated capacity and/or utilizing the thickened sludge storage to attenuate peaks in sludge production. As sludge production increases in future years, the Post Point Plant will increasingly need to operate both MHFs in excess of design capacity or rely more heavily on thickened sludge storage to attenuate sludge loading peaks. However, the current thickened sludge storage provides sufficient attenuation capacity to handle all solids loading conditions through 2035, so additional storage should not be necessary. Note that by year 2035, the peak day sludge production will require approximately 81,700 gallons of thickened sludge storage (74 percent of max storage capacity); the peak 3-day sludge production will require approximately 63,700 gallons of thickened sludge storage (58 percent of max storage capacity), assuming both incinerators are operating.

Sent From Larry's IPad.

Agata McIntyre

From: Larry McCarter <rdslarry@mac.com>
Sent: Wednesday, June 11, 2025 10:34 PM

To: Agata McIntyre

Subject: RO-52 Comment: Post Point Operates Over Capacity Synthetic Minor Permit inappropriate solution

to PSD violations caused by over-capacity issues.

Consultant Reports in 2008 and then in 2012 both state the facility is now over capacity. Population during the interim has increased by 10% and yet the capacity has not. Plans to meet "LLL" or "LLLL" are impractical and will lead to probable pollution. In 2022, capacity issues were experiences nearly every other day. See attached reports:



Section 3 • Existing Biosolids Facility

Year		Incinerator 1	Inciner
	Dry lb/yr	8,016,000	503,
	Dry tons/yr	4,010	25
	Avg Feed Rate, Dry lb/hr	1,480	1,4
	Total Gas Usage, Cuft/yr	7,071,000	1,253
	Standby Gas Usage ² , Cuft/yr	2,300,000	667,
	Standby Gas as % of Total Gas ³	33%	53
	Solids Processing Gas per Dry Ton, Cuft/ton	1,190	2,3
2011	Operating Hrs ¹	4,948	1,1
	Sludge Burned		
	Dry lb/yr	7,341,000	1,314
	Dry tons/yr	3,670	66
	Avg Feed Rate, Dry lb/hr	1,480	1,1
	Total Gas Usage, Cuft/yr	6,522,000	2,959
	Standby Gas Usage ² , Cuft/yr	2,136,000	1,150
	Standby Gas as % of Total Gas ³	33%	39
	Solids Processing Gas per Dry Ton, Cuft/ton	1,200	2,7

Notes:

- 1. Operating hours are hours of sludge burning; standby hours are not included.
- 2. Standby gas usage is required to maintain incinerator in hot standby mode.
- 3. Solids processing gas per dry ton is the total gas minus the standby gas divided by the

Incineration is the primary means of biosolids disposal at the Post Poil capable of reliably handling the 2035 sludge loads. As indicated by the illustrated in Figure 3-5, current average annual loads already exceed

Sent From Larry's IPad.

Agata McIntyre

From: Larry McCarter <rdslarry@mac.com>
Sent: Wednesday, June 11, 2025 7:47 PM

To: Agata McIntyre

Cc: Toby Mahar; Kim J Lund

Subject: NWCAA will be violating the CAA if if approves R0-52 as proposed:

June 11, 2025

Agata McIntrye NWCAA

Larry McCarter 212 Hawthorn Road Bellingham, WA

RE: R0-52 is inconsistent with Sewage CO Monitoring Regulations; Testing after Dilution ALWAYS yields unreliable test results.

Hello,

I have researched CO monitoring further to bolster my argument regarding NWCAA allowing the City to dilute the exhaust samples before sampling as proposed in R0-52.

RO-52's proposed CO sensor location must not be downstream of any outside air leakage; NWCAA's Approval of this location appears to be a serious violation of the CAA.

I have referenced the attached documents and believe the agency is wrong in incorporating any compensatory oxygen adjustment or "correction calculation" to establish actual Hydrocarbon (CO) density.

If I am correct, the entire history of emissions monitoring at PP will have been "unrepresentative"; thus, all conclusions will be illusory.

Larry McCarter

United States Environmental Protection Agency Office Of Water (4203)



THC Continuous I Monitoring Guida Sewage Sludge In

https://drive.google.com/file/d/16qsKwGvtTnRR5bzvgp76Bu1UmmOJMJ1o/view?usp=driv

esdk

D. Installation Specifications

To comply with Part 503, a CEM system must be inst such that representative measurements of THC, oxygen, stack gas moisture concentrations in exhaust gases fr sludge incinerators are obtained. EPA strongly recom that sample points for THC, oxygen, and stack gas moi located as close together as possible².

The optimum location of a CEM sample interface is determined by a number of factors, including ease of for calibration and maintenance, the degree to which conditioning will be required, and the degree to which sample location represents total emissions. The local should be as free from in- or out-leakage as possible from severe flow disturbances. The sample location is at least two duct diameters from the nearest control point of pollutant generation, or other point at which change in measured concentration occurs, and at least diameter upstream from the discharge point or a control device. For rectangular cross sections, the equivale diameter (D_c) is calculated as:

$$D_{\bullet} = \frac{2 \times L \times W}{L + W}$$

where:

L = length W = width

(Ref: 40 CFR Part 60, Appendix A, Method 1, Section .

If these installation criteria are not achievable or location is otherwise less than optimum, then the sam possibly be unrepresentative.

E. Span Settings

The oxygen CEM span should be 0-25 percent by voluthe instrumental part of the stack gas moisture CEM at

https://drive.google.com/file/d/1PkGx9ungl-dld_-OUHtFX4t7YEHAi4Sy/view?usp=drivesdk

Sent From Larry's IPad.

Agata McIntyre

From: Larry McCarter <rdslarry@mac.com>
Sent: Wednesday, June 11, 2025 10:33 PM

To: Agata McIntyre

Subject: RO-52 Comment: NWCAA will be violating the CAA if it fails to timely enforce CAA: PSD Criterion has

been met: BACT applies, facility wide; Penalties are Overdue.

https://drive.google.com/file/d/1HSrO9Frs-uvaRo91P5z7o0y8RvCIrRWk/view?usp=drivesdk

Due to City's own CO testing that showed 250+ tons of a regulated pollutant was calculated to have been emitted for several years, NWCAA is obligated by the CAA to regulate and enforce the facility as one with the potential to significantly deteriorate Bellingham. Failure to follow, implement and timely enforce the prescribed NSR requirements will likely violate the CAA.



Please apply the prescribed penalty's to our local incinerator for violating both "LLL" and "LLLL" emission rules to avoid spending the money to comply for 8 eight years.

Failure to apply the CAA when designing the RO-52's CEMS testing protocol will be a violation of the CAA. Attached below are the CO rolling average and other testing parameters that should be in the order with benchmarks and a testing plan that includes equations and a description of the equipment used to determine volumes for the necessary Oxygen corrections required because of the dilution. There is no credible reason to suggest "LLLL" is not the proper designation. It is more likely a court would find a NSR applicable before they would assign "LLL"standards for RO-52.

35 of 40 Pt. 60, Subpt. LLLL, Table 2

TABLE 2 TO SUBPART LLLL OF PART 60—E MULTIPLE HEARTH SEWAGE S

For the air pollutant	You must meet this emission limit a
Particulate matter	60 milligrams per dry stand- ard cubic meter.
Hydrogen chloride	1.2 parts per million by dry volume.
Carbon monoxide	52 parts per million by dry volume.
Dioxins/furans (total mass basis); or	0.045 nanograms per dry standard cubic meter (total
Dioxins/furans (toxic equiva- lency basis) b	mass basis); or 0.0022 nanograms per dry standard cubic meter (toxic
Mercury	equivalency basis). 0.15 milligrams per dry stand- ard cubic meter.

Sent From Larry's IPad.

Agata McIntyre

From: Larry McCarter <rdslarry@mac.com>
Sent: Wednesday, June 11, 2025 8:01 PM

To: Agata McIntyre

Cc: Toby Mahar; Julia; Robert Mittendorf

Subject: RO-52 Comment: Issuing this permit without applying the PSD rules would be a violation of the CAA

June 11, 2025

Agata McIntyre NWCAA

RE: Post Point test results show PSD "applicability"

I do not have any supporting documentation other than knowing the test results, though limited, concluded that PP WWWTP is subject to the uncompromising PSD guidelines in the CAA and Washington State law.

Issuing this permit without PSD compliance will be a violation of the CAA and a suite State of Washington's environmental laws.

Larry McCarter 212 Hawthorn Belligham, WA

PSD Rules in Washington State.pdf drive.google.com





× PSD Rules in Washington State.pdf

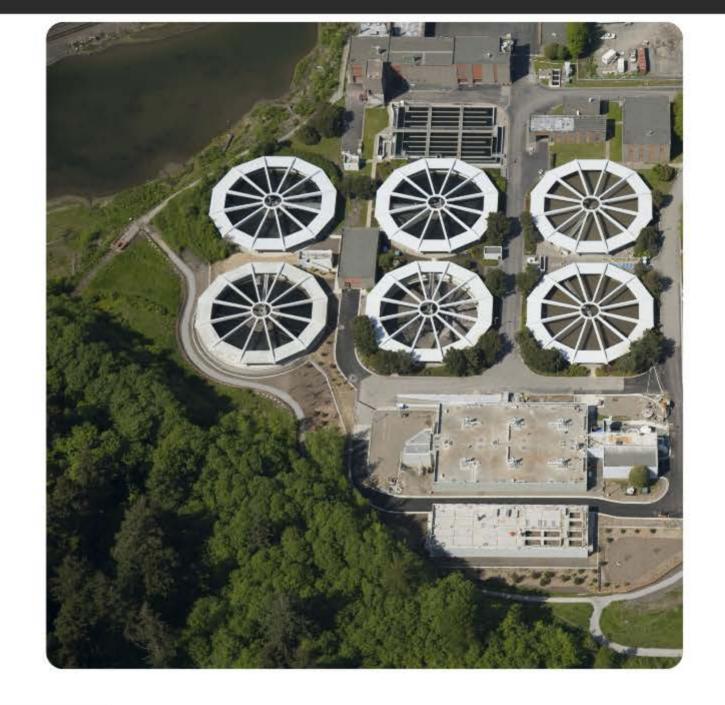


Guidance on Washington State's Prevention of Significant Deterioration Permitting Program

November 1, 2017 Publication no. 17-02-014 Sent From Larry's IPad.

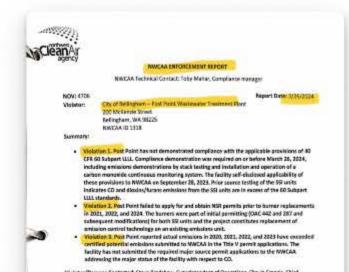
Burning Money, Risking Health

Stop Polluting Bellingham: Deny Permit

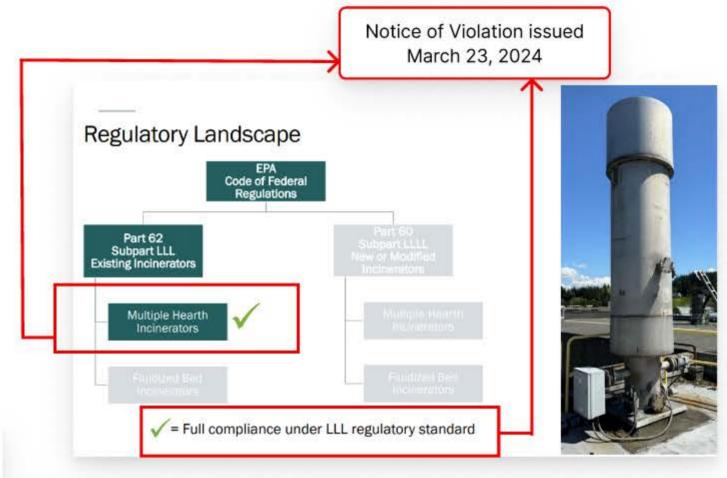


How did we get here?

- The Mayor and City Council relies on Public Works Staff to recommend paths forward.
- City Staff relies on Consultant expertise to predict best path forward.
- Consultants did not tell anyone about dangers or cost of **not using** High-Temp Incinerators or the capacity issue.
- Failed to mention PFAS and MHF's are DIRTY!
- · Which leaves us with no plan approved or even



Read the full NWCAA
Enforcement Report
Here



Consultant's Presentation March 2025.

Review the CoB meeting HERE.

What is Going Wrong at Post Point?

- The current incinerators are an old style of top loading incinerators With "HPV" status.
 - Imagine a burn barrel with a giant torch on top to keep the smoke down.
 - . That is what we have
- Installed in 1972 to serve the 41,000 b'hamsters.
- Now that same burner is trying to handle
 91,000 people
 - It is at or over capacity already.
- MHF's (Mulit-Hearth Furnace) burn dirty when overloaded and create CO directly into our city. Which is the focus of RO-52.
- No Air Operating Permit, or SSMP W/ mulitple violations and we are designated to be in the "PSD".
- · CO suggests overfeeding the furnace

POST POINT PLANT 200 MCKENZIE AVE

POST POINT PLANT

200 MCKENZIE AVE BELLINGHAM, WA, 98225





⊕ Zoom to



Days Since Last Compliance Monitoring Activity: 2614 Recent Enforcement? Yes

Maxar, Microsoft | Esri Community ... Powered by Esri

CAA

Violation Unaddressed; Local Has Lead
Enforcement

CWA
Failure to Report DMR - Not Received

RCRA
No Violation Identified

SDWA

Days Since Last Compliance Monitoring Activity: 2,614

Date of Last Formal Enforcement Action: 01/19/2023

Last Penalty Amount: \$13,120

View Post Point Plant recent violations HERE.

←2,614 Days since Compliance!

Why is CO a Bad Thing?

Carbon Monoxide is one of the nine pollutants any SSI must test for.

- · We have always had to test for it.
- Carbon Monoxide is a "marker" compound revealing the presence of Volatile Organic Compounds being emitted alongside CO.
- 100 tons of CO is a huge amount of any pollutant. Every year, last 4 years.
- CO is one reason we are HPV & PSD
- "PSD" program: Prevention of Significant Deterioration...

Oxygen Displacement	CO binds to hemoglobin in the red blood cells much more strongly than oxygen about 200 times more tightly. This means it displaces oxygen, reducing the bloods ability to carry oxygen vital organs like the brain and heart.
Toxic Effects on Organs	The resulting lots of oxygen can cause symptoms from headache, dizziness, fatigue, confusion to more severe outcomes, like loss of consciousness, heart damage, brain damage, or death, especially in enclosed spaces or high concentrations.
Undetectable by Human Senses	CO is a colorless, odorless, and tasteless, making impossible to detect without special equipment, disallows dangerous levels to build up unnoticed until symptoms. Which are mistaken for the flu or simple fatigue.
Risk to Vulnerable Populations	Vulnerable people with heart or lung disease, infants, children, and pregnant individuals in the elderly at great risk of severe harm from CO exposure
Chronic and Long-Term Effects	At even a low level, chronic exposure can lead to persistent headaches, confusion, and memory loss and other neurological problems. Severe poisoning can result in long-term complications, such as chronic fatigue, movement disorders, and permanent brain damage.

What Can CO Monitoring Tell Us? Monitor Results -vs- Enforcement Strategy

High CO means we're poorly combusting the waste due to exceeding the in-feed limits. High CO is a symptom of the unaddressed overfeeding due to Among other things, not having an Approved Air Operating Permit that employs BACT.

The rules say, Within an hour of certification, we will begin to be able to predict CO compliance. RO-52 is **required** by PSD rules to use 24-hour time block to determine Violations of the "seven day" rules for violators exceeding their daily "rolling averages".

PO-52 ridiculously permits a 365 days "block", not the required One Day. This is why they are called "continuous". If we exceed the daily limits for seven days, we fail the PSD and HPV grace periods and must immediately shutdown.

That tells us \rightarrow

We are overfeeding our incinerators.

Too much CO equates to capacity issues.

These furnaces are "spent" and too small to f



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C., 20460

OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

August 25, 2014

MEMORANDUM

5/42

SUBJECT: Revision of U.S. Environmental Protection Agency's Enforcement Response

Policy for High Priority Violations of the Clean Air Act: Timely and Appropriate

Enforcement Response to High Priority Violations- 2014.

FROM: Phillip A. Brooks

Director, Air Enforcement Division

Office of Civil Enforcement

TO: Regional Air Enforcement Division Directors, Regions 1-10

Regional Air Enforcement Branch Chiefs, Regions 1-10

Regional Counsels, Regions 1-10

CC: Environmental Council of States

National Association of Clean Air Agencies Association of Air Pollution Control Agencies

Attached is the revision to the U.S. Environmental Protection Agency's (EPA) enforcement response policy for High Priority Violations of the Clean Air Act (CAA) - Timely and Appropriate Enforcement Response to High Priority Violations-Revised 2014. This revision supersedes The Timely and Appropriate (T&A) Enforcement Response to High Priority Violations (HPVs) issued in 1998. This revision reflects what the EPA has learned and how enforcement decisions have changed over the past 15 years.

Read about the EPA revision for the response policy for HPVs of the Clean Air Act in full HERE.

Bellingham is an HPV and PSD Violator Monitor Results -vs- Enforcement Strategy Of RO-52 (or lack of)

"HPV" Designates a High Priority Violator which has the effect of tightening monitoring and testing timelines, and limits for compliance.

PSD is not the same regulatory scheme as before: Bellingham has been reassigned to participate in the "prevention of significant deterioration" program; "PSD" is the upper most tier of CAA's enforcement with tight, unbendable compliance schedules and up to\$500k per day fines for our city.

That tells us \rightarrow

When Any south wind is Blowing, and you go to Marine Park, Alaska Ferry Terminal, Fairhaven, you're in danger.



Guidance on Washington State's Prevention of Significant Deterioration Permitting Program

←Read the Department of Ecology's Guide for the Prevention of Significant Deterioration Permitting Program HERE.



Review current and up to date HPV at Post Point on the EPA's site HERE



The toxic truth hiding in plain sight

The Dangers at Post Point

What Really Burns at Post Point?

Initial List of Hazardous Air Pollutants with Modifications

Under the Clean Air Act, EPA is required to regulate emissions of hazardous air pollutants. This original list included 189 pollutants. Since 1990, EPA has modified the list through rulemaking to include 188 hazardous air pollutants.

CAS Number	Chemical Name	
75070	Acetaldehyde	
60355	Acetamide	
75058	Acetonitrile	
98862	Acetophenone	
53963	2-Acetylaminofluorene	
107028	Acrolein	
79061	Acrylamide	
79107	Acrylic acid	
107131	Acrylonitrile	
107051	Allyl chloride	
92671	4-Aminobiphenyl	
62533	Aniline	
90040	o-Anisidine	

188 regulated hazardous pollutants

Under the Clean Air Act, EPA is required to regulate emissions of hazardous air pollutants. Many Are found at Post Point including PFAS. See the EPA list here.

6,570 Tons per Year

That is only 2 truck loads a day. (Based on hourly infeed rate)
The unknown right now is how much water is being heated. Bellingham generates 20 containers a day of dry, solid waste or about 65,000 tpy.
Sewage sludge dipsosal is insignificant compared to regular wastes disposal.

Forever Chemicals & 100+ Tons of CO. Why?

Stormwater sludge carries rubber tire dust, brake pad particles, PFAs, oils, heavy metals, pharmaceuticals, pesticides, endocrine-disrupting chemicals and more.

RO-52: Why is RO-52 Dangerous & Why Does it Matter?

This permit is "Synthetic" or an "imagined" regulatory bridge that avoids a shutdown due to excessive overfeeding.

The permit must be re-written to tighten down the testing and enforcement protocols to be protective of the community In the event CO is still being emitted. As written, the city can pollute 100 more tons, for one more year. That is unacceptable and not what the rules and policy dictate.

RO-52

- Shields Post Point from mandatory shutdown for Ongoing polluting
- Does Not Resolve The missing Air Permit or SSMP
- Omits "BACT" Location, testing or enforcement
- Should include air-modeling due to extraordinary short stacks only 32 feet high, not a normal 60'
- Should include soil testing and SEPA, air modeling.

R0-52 Permit Conditions

As authorized by Northwest Clean Air Agency Regulation Section 121.7, this Order is issued subject to the following restrictions and conditions:

- 1. Limit total emissions of Carbon Monoxide (CO) from Sewage Sludge Incinerator (SSI) 1 and SSI 2 to less than 9.0×101 tons, combined, during any 12 consecutive rolling months.
- 2. On or before July 1, 2025 install, calibrate, and certify (as per Condition 3) continuous emission rate monitoring systems (CERMS) to measure CO and gas flow from the exhaust stacks of SSI 1 and SSI 2.
- 3. Calibrate, maintain, and operate the CERMS identified in Condition 2 in accordance with the requirements specified in 40 CFR 60.4900(b), 40 CFR 60.13 (other than opacity), 40 CFR 60 Appendix B Performance Specification 4B and 6, and 40 CFR 60 Appendix F Procedure 1.
- 4. Within 30 days after the end of each calendar month, calculate monthly total SSI 1 and SSI 2 CO mass emissions as measured by the CERMS (Condition 3) for each hour that one or more burners operated. Any alternate method must be approved in writing by NWCAA. Keep records detailing all calculations.
- 5. Within 30 days after the end of each calendar month, sum the monthly CO emissions from SSI 1 and SSI 2 (Condition 4) measured by the CERMS during the previous 12 consecutive rolling month period and compare the total to the limit in Condition 1. Submit reports to NWCAA as follows:
 - (A) If the CO emissions exceed 90% of the limit in Condition 1, submit a report within 30 days of discovery.
 - (B) If the CO emissions exceed the limit in Condition 1, submit a report within 7 days of discovery.

RO-52 Drags Out Enforcement

Lawyers Hired by the City Avoid Compliance

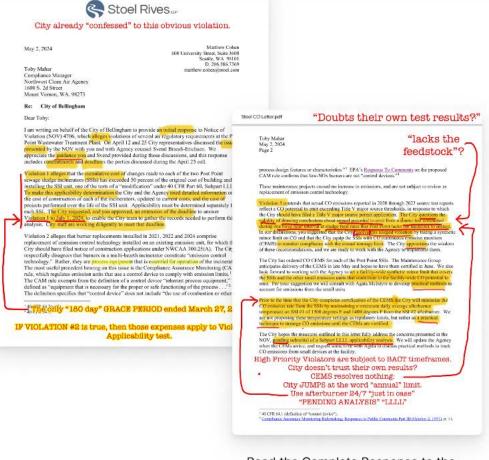
Pollution is occurring right now. Meanwhile, the lawyers "slow-walk" enforcement. It has already been over one year since we received the NOV. The lawyers are using disingenuous delaying tactics that do not protect the citizens of whom they are paid to represent. City residents are paying for their legal services and deserve to be protected for their money.

RO-52 Delays Enforcement

The laws are designed to be protective of our health. The lawyers have already made weak arguments that have successfully delayed enforcement since 2016 (when we didn't get an Air Operating Permit).

RO-52 Distracts from Enforcement of "LLL"

The protocols suggested are not even in the law books.



Read the Complete Response to the Notice of Violation HERE

PFAs Have Made Sewage Sludge Handling a Major Problem

And landfilling Is now the answer



EPA Unable to Assess the Impact

Read the full report HERE.



Brown & Caldwell receives funding grant for PFAS incineration study

Read the complete announcement HERE

11 / 42

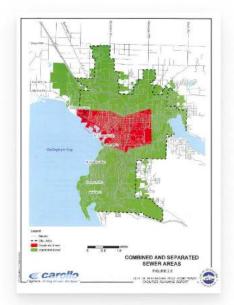
Interim Guidance on the **Destruction and Disposal of** Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances— Version 2 (2024)

> INTERIM GUIDANCE FOR PUBLIC COMMENT APRIL 8, 2024

Interim Guidance on PFAS Destruction and Disposal

Read the complete guide HERE

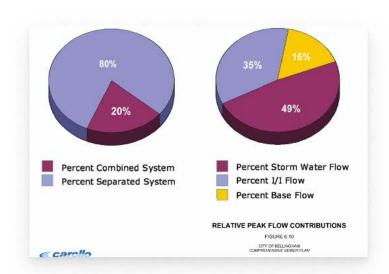
Roadwash & Stormwater Introduce Other Pollutants



Combined Sewers Are Here Forever

There's only 11 cities in the state that do this. No city with combined sewage shoule be incinerating their waste.

See the Comprehensive Sewer Plan HERE.



Stormwater is Industrial Strength Wastewater

Stormwater sludge carries rubber tire dust, brake pad particles, PFAs, oils, heavy metals, pharmaceuticals, pesticides, endocrine-disrupting chemicals and more.

Just How Old Are the Incinerators?

Installed in 1972, it operates on 20 year service cycles. We're on year 50.

City lets contract

(Continued from Page 1)

pendently. He said more that 200 man-hours were involved i developing a foot-high stack of computations

A representative from Cone and asked the board to consid er re-evaluation, possibly third-party evaluation or rejection and rebidding

CH3M's cost factor shower \$963,047 the Enviro Tech incinerator, 2 today's costs, would cos \$1,473,240 to operate for 2 The capital cost in the

> Board member Bert Foste said he was not satisfied with the way the specifications for the incinerator were written. He said it was impossible when the hids were opened to know who was low, and that had to be decided by the engineers.

Post Point Incinerator #1 Original Cost; 17 Aug 1972

City awards treatment plant work

consensions for the city's new sawage duposal plant, the Bellinghing Water Board accepted the last of Kavaro tech for a fur The board also accepted the land Partie Consequition Co.

Awarding the plan bid had

have the low figure to be deterbut on operating rost over 20

Jim Point, from the city's counding engineers. CH3M. and such a find format is not specified with high operating

On the first annivair. Copeland Systems Inc. had been low. aut after discovering mismatched figures. CH3M went mes, and ligured the costs inde-(Continued on Page 2, Col. 4)

"We buy parts off eBay," Olinger saud, referring to the incinerator programmable logic controller. "We find parts wherever we can to keep the system running."

Cascadia Daily News

Two Alfa Laval G2-95 model centrifuges were installed in 2011 and are used to process up to 35 of 154 2.500 dry pounds per hour (lb/hr) of solids each. The centrifuges operate with a single-duty unit.

4.3.1.4 Solids Incineration

Major Component Repairs:

Post Point uses two MHFs to incinerate its biosolids with an approximate total capacity of 2,400 lb/hr. MHF 1 was installed in 1973 and MHF 2 was installed in 1993. The MHFs require regular repair and maintenance to the refractories, hearths, insulation, shell reinforcements, and to the programmable logic controllers (PLCs), all of which is becoming increasingly difficult and costly due to their age. The PLCs are over 30 years old and are no longer available from the original equipment manufacturer. With a typical life expectancy of 25 years, major maintenance on the MHFs in the future would likely require replacing the furnace firebrick and hearths, the wet scrubbing system (due to erosion and corrosion), and the center shaft drive mechanisms. The City is currently in the process implementing some of these maintenance repairs, which are anticipated to be completed for both incinerators in 2022.

The formation of slags and clinkers are reoccurring operation and maintenance problems that limit MHF performance. Slag is the accumulation of molten or fused ash that can stick to the MHF walls, rabble arms, or center shaft. Clinkers are hard or soft clumps of fused ash that can jam rabble arms or the ash-conveying system. Although some modifications to the MHF have reduced the occurrence frequency of slag and clinkers, they remain a maintenance challenge.

MHF operation is costly due to energy demands—they require approximately 25,000 to 60,000 cubic feet of natural gas per day, 2,500 megawatt hours per year of electrical power, and 3,300 gallons of diesel fuel. No energy or heat recovery system is currently used with either furnace to offset energy consumption.

Brown Mt Caldwell

4-6

Clean Air Act: Air Quality Rules



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 155 Seattle WA 98101-3188

AIR & RADIATION

Mr. Robert Johnson City of Bellingham Public Works Department Public Works Superintendent of Plants 104 West Magnolia, Suite 109 Bellingham, Washington 98225

Dear Mr. Johnson:

This letter is in response to the site-specific monitoring plan (SSMP) dated December 11, 2015, and the petition dated January 8, 2016, submitted from the City of Bellingham Wastewater Treatment Plant (Bellingham) to the U.S. Environmental Protection Agency (EPA). These submittals concern the Bellingham sewage sludge incinerator (SSI) located in Bellingham, Washington, that is subject to the Federal Plan Requirements for Sewage Sludge Incineration Units Constructed on or Before October 14. 2010, 40 C.F.R. Part 62, Subpart LLL (SSI Federal Plan). These submittals request the EPA approval of the Bellingham SSI petition and SSMP as required by the SSI Federal Plan at 40 CFR 88 62.15965 and 62.15995, respectively.

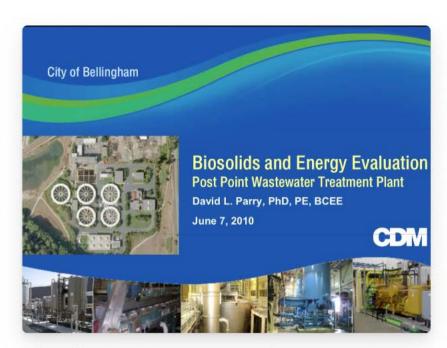
The EPA approves in part and disapproves in part the Bellingham SSI petition and SSMP submittals to establish and monitor site-specific operating parameters, operating limits, and averaging times as specified below.

Petition for Site-Specific Operating Parameters and Limits for Mercury and Dioxins/Furans

According to 40 CFR § 62.15965, owners/operators of SSIs who use an air pollution control device other than a wet scriftiber. fabric filter, electrostatic precinitator, activated carbon injection, or

Partial approval in 2019 - Requests updates

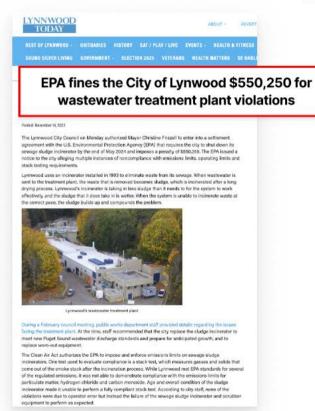
You can read the full report HERE.



Biosolids and Energy Evaluation 2010

Stormwater sludge carries rubber tire dust, brake pad particles, PFAs, oils, heavy metals, pharmaceuticals, pesticides, endocrine-disrupting chemicals and more.

What Are Other Washington Cities Doing? The Nation?



Lynwood had CO issues & \$500k+ fines

They chose to switch to landfill. Lynwood had an approved AoP and were still fined.



Wastewater Treatment Plant

May 2016

Edmonds Opted for Pyrolysis

After being exempt from CAA. However, now landfills some.

Vancouver, WA

Uses one incinerator and landfilling for maintenance and downtime.

Anacortes, WA is also in trouble:

They own a MHF too.

〈 15 / 42 >

Why do we need CO monitors?

Without sensors, a shutdown will be mandatory.

We're seeing a legal leap frog over no Valid Air Permit Issue.

Records revealed Bellingham has been very bad for the last 4-5 years. Over feeding the burner triggered enforcement over 100 tons per year of random, dangerous pollutants. Alarm bells in the regulators offices went off and now we face a showdown.

This RO-52 is a legal "Hail-Mary" designed to skirt full compliance and minimize enforcement intervention.

That means→

Bellingham is locked in as a High Priority Violator subject to the terms of the "PSD" program which is the worst category of offenders with the maximum fines available.

This permit is not the Air Operating Permit the facility needs first.

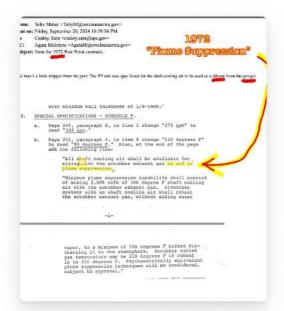
There is another missing permit for an entirely new division of Clean Air that involves enforcement. Bellingham operates without an AOP; this new permit is not designed to be a stand alone permit & must be denied.

RO-52 needlessly & dangerously enables our unpermitted incinerators to continue to deteriorate all of Bellingham's health and well-being. Without this permit, the incinerator would have to immediately shutdown, and it should.

This permit, as written, does not require timely compliance or all required operating permits, nor the required best available air control technology, including incorrectly locating the sensor.

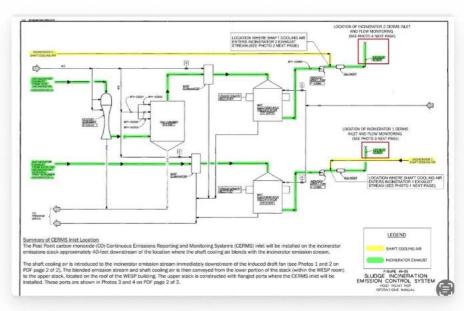
This permit as written is unprotective of our community and must be denied.

Sensor Location Matters: Dilution Invalidates all test results



Dilution is Bad

In 1972 Pollution contol was to dilute the plume. We can not be taking our measurements from diluted air. Commissioning these monitors prohibits dilution prior to testing.



A CO Sensor Mapping Drawing

View the sensor plan HERE.



Sensor Location: RO-52 Needs to include an Enforcement Plan

Method 10 8/2/2017

While we have taken steps to ensure the accuracy of this Internet version of the document, it is not the official version. The most recent edits to this method were published here: https://www.gpo.gov/fdsvs/pkg/FR-2016-08-30/pdf/2016-19642.pdf. To see a complete version including any recent edits, visit: https://www.ecfr.gov/cgi-bin/ECFR?page=browse and search under Title 40, Protection of Environment.

METHOD 10—DETERMINATION OF CARBON MONOXIDE EMISSIONS FROM STATIONARY SOURCES (INSTRUMENTAL ANALYZER PROCEDURE)

1.0 Scope and Application

What is Method 10?

Method 10 is a procedure for measuring carbon monoxide (CO) in stationary source emissions using a continuous instrumental analyzer. Quality assurance and quality control requirements are included to assure that you, the tester, collect data of known quality. You must document your adherence to these specific requirements for equipment, supplies, sample collection and analysis, calculations, and data analysis. This method does not completely describe all equipment, supplies, and sampling and analytical procedures you will need but refers to other methods for some of the details. Therefore, to obtain reliable results, you should also have a thorough knowledge of these additional test methods which are found in appendix A to this part:

- (a) Method 1-Sample and Velocity Traverses for Stationary Sources.
- (b) Method 4—Determination of Moisture Content in Stack Gases.
- (c) Method 7E-Determination of Nitrogen Oxides Emissions from Stationary Sources (Instrumental Analyzer Procedure).
- 1.1 Analytes. What does this method determine? This method measures the concentration of

Continuous Monitoring: Rolling Average of 7days not 365

The Rolling Average is 7 days, not 365.

Emission Exceedance Calculation and Reporting

3-Hour Rolling Average Based on 1-Hour Blocks Final - August 2021

Permit Language: NOx: Monitored by continuous emission monitor continuously, based on a 3hour rolling average based on a 1-hour block average. [N.J.A.C. 7:27-22.16(e)]

Examples: Permit limit 50 ppm (NOx) and assume all hours are valid hours unless otherwise noted.

Example #1 - No violation

	Hours 3-5 in compliance (35 ppm		ım)		
	Hours 2-4 in compliance (42 ppm)				
Hours 1-3 in	compliance (43 pp	om)			1
30 ppm	45 ppm	55 ppm	25 ppm	25 ppm	20 ppm
Hour 1	Hour 2	Hour 3	Hour 4	Hour 5	Hour 6

Calibration is highly regulated, including commissioning and NO dilution.

Active Clean Air Act Violations

Title V and the "PSD" Program





A New Source Regulation violation for excessive CO emissions. A HPV by the EPA with continuous violations from 2016-2025 and no compliant monitoring plan. Link to EPA Denial Letter HERE.



No Air Operating Permit (AOP) since 2016

AOP Violation Letter HERE

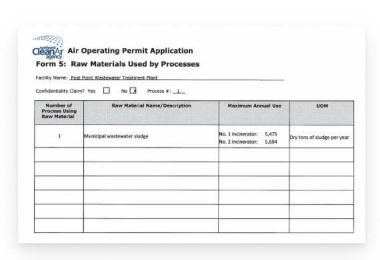


Permit attempt (RO-52) sidesteps enfocement

Enforcement timetables for HPV and PSD now apply.

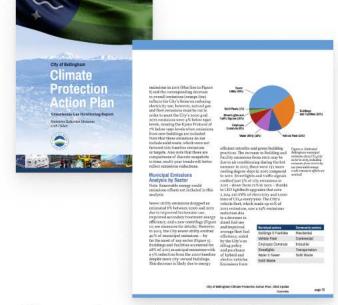


Climate Action Goals Versus Incineration



Carbon Footprint of 24M cubic feet of Nat. GAS

All the effort on climate change is undone at Post Point. 35% of the footprint is used to "mask" or hide the smoke in AFterburners.



Climate Protection Action Plan = A Shutdown

WhY do we do this when we say we don't?

Read the Climate Protection Action Plan HERE.

You can read the full report HERE.

Ignoring Critical Issues - Testing, Impacts, Consistency of Service



Sham-Testing Issues & Technical Failures

- CO is used as a "marker" for volatile organic compounds (VOCs), but data is invalid.
- Sensors were placed after Air dilution Is inntroduced. AKA → Sham results
- Scrubber failures recently led to direct public exposure & no public notification
- Low-temperature incineration = widespread PFAS distribution in Fairhaven & beyond

Nullifying Our Climate Commitments

- City burns 24 million cubic feet of natural gas as afterburner fuel
- Incineration undermines Bellingham's climate action goals
- MHF incinerators operate at lower temps = ineffective PFAS destruction
- EPA recommends landfilling or high-temp incineration (not MHF)

System Overload

- · Facility is already at capacity and cannot scale for growth
- Increased population = increased waste
- We don't have the infrastructure to Justify fixing it. Too small, no redundancy
- EPA guidance warns against expanding incineration in aging systems

The Core Risks To Our Community - Silent, Invisible Pollution

Poor Public Health

Lax enforcement has resulted 100's of tons of pollutants.

Best available Air Control Technology is Not in this permit.

Without redundancy, water and air are both at risk for the likely failure of 50 year old incinerators.

Financial Waste

Any money, time Spent on consultants or lawyers Wastes money. This is 2nd grade math Problrem: The wrong answers are causing financial waste:

Incinerating Vs. Landfilling \$3,000/ton -Versus - \$250/ton

Higher Sewage Rates

Sewage Rates could go down.

The expense of all the lawyers engineers, tech and certified incinerator operators adds up fast. Add in the recurring utilities Costs and it grows beyond what the people of Bellingham are prepared to pay monthly in rate increases.

Climate Action Plan: Shutdown!

We could make the Climate Action Plan Succeed. Post Point represents 30% of the city's impacts. A shutdown will **instantly** save enough natural gas to heat hundreds of homes.

Why a Rewrite of this Permit Matters

Post Point Is polluting and it can economically stop immediately

Dangers

- Illegal, invisible, poisonous gases are in Our public areas
- High Priority Violations (HPV) with EPA
- 50 year old facility →
- Over-capacity
 - There are 2x as many people Since 1972
- Title V Violator
- Clean Water Act violations
- Short smoke stacks
- Emits PFAS; Mercury, Lead, Dioxin, etc, all are detected.
- Emitted 100t/yr of pollutants
- No Air Permit or SSMP
- No Compliance Plan
- No Valid Instrumentation
- · Climate action Plan Stalled

Financial Waste

- Incineration Costs: \$3,000/ton
- · Landfilling Costs \$250/ton
- · Incinerator installation: \$270M
- Incinerator man hours \$1M/yr
- Energy Costs \$250K/yr
- Interest/year 5% = \$13M

We Can Save \$ with a shutdown:

- · No Consultants or Lawyers
- No specialized engineers
- No testing services or specialized service contracts
- No natural gas bills & reduced electrical costs
- · 840 homes natural gas savings
- \$40M interest only is \$1m more than Landfilling per year.

Missdirection Corrected:

- \$40M does not increase the facility capacity
 - · We're at or above capacity now
 - · Hence, the RO-52.
- \$40M does not achieve adequate temperatures to destroy PFAS
 - Increased temp may increase other pollutants
 - A \$200M error
- Low Infrastructure costs make the real difference of landfilling vs. Incineration.
 - \$250/ton vs. \$3,000/t.

Solutions

- · EPA recommends landfilling
- Lynwood, Edmonds, Vancouver,
 WA already ahead of us shutting down MHF due to CO
- Landfills
 - · Contain our waste
 - · More redundancy
 - Endless capacity
 - Are giant Anaerobic digesters that can recover energy from biosolids
 - · Make no pollution Anywhere
- Landfilling = only 1-2 long haul trucks per day
- · Less employee traffic on-site
- Old incinerator can be mothballed for back-up
- Rail spur is already on site for landfilling
- Opportunity for fiber farm for future environmentally-savvy products!

We're burning cash and our community's health for a price tag over \$500M

- An alternative exists for a fraction of the cost...

The Cost

Consultant Compared Landfilling Costs

Recommended Immediate Interim Use

Consultant determined landfilling as the least cost alternative with the lowest infrastructure and operational costs.

SEE: Consultants Recommend Landfilling Page 137.

This means \rightarrow

It's not feasible or reasonable to continue to operate or modify actively running incinerators that are out of compliance.

Landfilling is cost effective



Capacity is the Killer City of Bellingham's Own Consultants Declared

Over Capacity in 2008: \$40M doesn's fix this.

- MHF burn dirty to start with
- · Over Feeding results in CO
- 1975 40,000 residents -vs- 90,000 today.
- Duty to plan Consistent of Service: No Redunancy!

How can you extend the life of something with no capacity to grow?

	Avg Feed Rate, Dry lb/hr	1,480	1,410	
	Total Gas Usage, Cuft/yr	7,071,000	1,253,000	8,324,000
	Standby Gas Usage ² , Cuft/yr	2,300,000	667,000	2,967,000
	Standby Gas as % of Total Gas ⁵	33%	53%	36%
	Solids Processing Gas per Dry Ton, Cuft/ton	1,190	2,340	1,260
2011	Operating Hrs ¹	4,948	1,118	6,066
	Sludge Burned			
	Dry lb/yr	7,341,000	1,314,000	8,655,000
	Dry tons/yr	3,670	660	4,330
	Avg Feed Rate, Dry lb/hr	1,480	1,170	
	Total Gas Usage, Cuft/yr	6,522,000	2,959,000	9,481,000
	Standby Gas Usage ⁴ , Cuft/yr	2,136,000	1,150,000	3,286,000
	Standby Gas as % of Total Gas ³	33%	39%	35%
	Solids Processing Gas per Dry Ton, Cuft/ton	1,200	2,740	1,430

otes:

- 1. Operating hours are hours of sludge burning; standby hours are not included.
- 2. Standby gas usage is required to maintain incinerator in hot standby mode.
- 3. Solids processing gas per dry ton is the total gas minus the standby gas divided by the dry tons of sludge burned.

Incineration is the primary means of biosolids disposal at the Post Point Plant and thus it must be capable of reliably handling the 2035 sludge loads. As indicated by the 2006 to 2011 data and illustrated in Figure 3-5, current average annual loads already exceed the capacity of MHF 1 and peak loads exceed the capacity of the maximum design capacity of both MHFs. The Post Point Plant is only able to continue operating in this manner by operating the MHFs above their design rated capacity and/or utilizing the thickened sludge storage to alternuate peaks in sudge production. As sludge production increases in future years, the Post Point Plant will increasingly need to operate both MHFs in excess of design capacity or rely more heavily on thickened sludge storage to attenuate sludge

loading peaks. However, the current thickened to handle all solids loading conditions through Note that by year 2035, the peak day sludge pr thickened sludge storage (74 percent of max st require approximately 63,700 gallons of thicke capacity), assuming both incinerators are oper

Solids Handling at the Post Point Plant

• Thickening equipment is currently operating well

Report: Business
Case Evaluation

Treatment Facility

for Bellingham

Post Point Wastewater

HERE

- Reliable solids handling has complimented wastewater treatment in the past
- Currently wastewater treatment is adversely impacted from 5 day multiple hearth furnace operation
- Aging multiple hearth furnaces are consuming rather than producing energy, require continued maintenance, have limited redundancy and will require upgrades to meet pending air permit regulations

View the Biosolids and Energy Evaluation HERE

High-Temp \$200M versus \$400K Landfilling Infrastructure

Cost Per Ton: \$2,500/t to burn -vs- \$250/t To Landfill with Energy Recovery

Low Temp vs. High Temp Incineration

Bellingham currently uses Low-Temp incineration and proposes updates for \$40-540M to current incinerators. Upgrades and utilities all paid for by Bellingham taxpayers.

Consultants Ignoring EPA Objections

Consultants like Brown & Caldwell repeatedly ignore EPA objections and reports exclude landfilling from analysis.

An inherited issue for NEW Mayor Kim Lund

Being fed misleading information, an unfortunate issue was left on the desk for Mayor Kim Lund. How do we collectively react - fix the issue for the future or continue blatant deception and ignore damage?

ALTERNATIVES EXIST

Landfill Infrastructure cost \$400K up to \$1.4M with some dewatering.

Enforcement timetables for HPV and PSD now apply.

There's a cleaner, safer, and cheaper way forward.

Solutions

Reviewing The Timeline

2011

CAA rules change & give 5 years to comply

In 2016 an approved AOP is due

2016

Air Operating

Permit Was Due

Violation of compliance begins. City declares incinerators obsolete & embarks on \$1B Digester Project 2020

Bellingham continues operations without compliance

City of Bellingham scraps plan to add a digester and incinerate at any cost - continuing operations without addressing violations

2023

Designated high-priority violator

1975
Post Point Waste
Incinerator Opens

Description of opening date and type of incinerator

2012 Facility flagged as over capacity

2019

EPA Sends Denial Letter

EPA denies certification for Sewage Sludge Incineration (SSI), retroactive certification not allowed, SSI is mandatory. Meanwhile, no path forward applied. April 2025
Bellingham opts for \$40M investment to continue incineration

For nearly a decade, Bellingham has operated a high-risk, polluting incinerator without federal compliance.

And now they want to double down on that investment.

The Solutions Are There



Site Specific Continuous Parameter Monitoring Plans

> Sewage Sludge Incinerator at City of Lynnwood, WA Wastewater Treatment Plant

> > May 2016

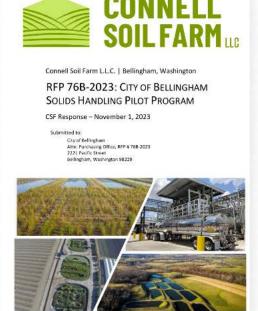
Acrobic Anaerobic Bloreactor and and region states in the property of the pr

Look to Others for Success

- Edmonds, Lynnwood, and Vancouver already stopped incinerating
- Alternative solutions include anaerobic digestion, composting, drying.
- They made the switch—so can we

The Landfill Alternative

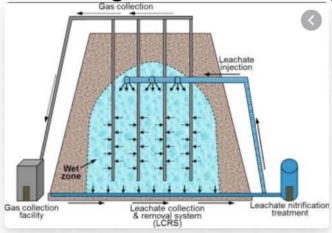
- EPA prefers landfilling for sewage sludge
- Requires less investment, fewer emissions, and no natural gas!
- Safer for workers and neighborhoods
- Not a "dumping" plan but waste is treated
 & stabilized
 Read the a < 30 / 42 >



Opportunity for Future Health

Alternatives like Connell Soil Farm were proposed. Offering an EPA preferred and cost for a fraction of the price.

Landfilling works but Land Application or Incinerating won't.









The Solution is Here & For the Better

Opportunities

- · Regional solutions WITH redundancy
- · Recycling lagoon solids for energy or reuse
- Transport options reduce neighborhood exposure
- · Long-term health savings
- · We get a digester with energy recovery for almost free.

Final Ask - Make the Safe Change

- Stop the permit (RO-52) until a real solution is on the table
- · Pause funding for incinerator upgrades
- · Demand an SEPA review And BACT.
- · Support installing landfilling infrastructure now

This is our chance to build smarter.

Redundant systems, regional cooperation, and cleaner processes can turn a toxic liability into a resilient future.

Why wouldn't we choose that?

We've seen the danger. We've seen the cost. And we've shown there's a way forward. Now we're asking our city and community: let's stop polluting Bellingham and choose a better path.

Appendix 1: Photographic Examples

Stop polluting Bellingham: Deny Permit



Stacks in Fairhaven



Sensor Locations (improper-diluted)



Photo 1: Roof access to incinerator stacks



Photo 2: Incin 1 stack, looking NE



Photo 3: Incin 1 stack, looking SE



Photo 4: Incin 2 stack, looking W



Photo 5: Incin 2 stack, looking S



Photo 6: Incin 1 ports available for CEMS and Flow Monitoring



Photo 7: Incin 2 ports available for CEMS and Flow Monitoring



Photo 8: Conduit routed into WESP room, at Incin 1



Photo 9: Conduit routed from incin 1 and 2 stacks to WESP room

Old and New Sensor Location Receives Diluted Samples



Air Operating Permit Application - Note Maximum Annual Use

Form 6: Fu	Operating Permit Application els Used by Processes Point Wastewater Treatment Plant 17 Yes		
Number of Process Using Fuel	Fuel Name/Description	Maximum Annual Use	Unit of Measure
Incinerator #1 Incinerator #2	Natural gas	24	Million cubic feet per yea

City owned and then had an interest in the original recomp burners



There is still an **unlined** ash pit there with the City's waste and ash buried In it.

The City Has Polluted for Years now.

Recomp of Washington Whatcom County ceased incineration and only landfilled shortly after this.

This is now a Hazardous Waste Site.

City Disposal Decisions Stink





City's Ash Pile and Ashfills

Unlined MSW/Medical Waste "Ashfill" @ Recomp

The City of Bellingham owned incinerator's that generated % of this ash fill The ash is mixed with **toxic medical waste** AKA **heavy metals.**None of it is lined. Monitoring wells? **Gone**.

Public Hearing 6/11/25

Recording link coming soon!



Erin Parberry speaks for the

community and business

Appendix 2: Important Links & News

Stop polluting Bellingham: Deny Permit



City of Bellingham Documents

City of Bellingham Emission
Control Upgrades Project
Biosolids & Energy Evaluation
Water Use Efficiency
Program
COB Notice of Violation
Response Letter
Climate Protection Action
Plan 2018

EPA Documents & News

- EPA Revision of enforcement of HPVs to Clean Air Act Letter 2016
- EPA Unable to Assess the Impact
 of Hundreds of Unregulated
 Pollutants in Land-Applied
 Biosolids on Human Health and the
 Environment
- EPA Location & Facilities HERE
- EPA Unable to Assess the Impact of Hundreds of Unregulated Pollutants in Land-Applied Biosolids on Human Health and Environment
- Revision of EPA Enforcement Policy for HPA of the Clean Air Act 2014
- · EPA Hazardous Air Pollutants
- EPA Initial List of 188+ Hazardous Pollutants

Stop Polluting Bellingham Resource Hub

- Columbia Ridge Landfill & Energy Project
- Biosolids Business Case
 Evaluation: Bellingham Post Point
 Wastewater Treatment Facility
 Report
- CO Sensor Drawing
- Shaft Cooling Air Dilution Memo 1976
- Guidance on WA State Prevention of Significant Deterioration Permitting Program
- Public Works and Natural Resources Committee
- NWCAA Enforcement Report
- Brown & Caldwell Grant Article
- Interim Guide on PFAS Destruction & Disposal

News Articles

- Cascadia Daily Post Point Moves Ahead With Lower Price Tag
- EPA Fines City of Lynwood \$550,259 for wastewater treatment plant violations
- Cascadia Daily City to embark on Post Point incinerator upgrade project
- Bellingham receives notice wastewater plant violated air quality standards
- High sewer rates coming as city replaces treatment plant incinerators