VIA E-MAIL: NOC@pscleanair.org

June 28, 2019

Attn: NOC Application Submittal
Puget Sound Clean Air Agency
1904 Third Avenue
Seattle, WA 98101

RE: Notice of Construction Permit Application under WAC 173-400-114 for Emission Control Device Alterations at the Cadman Kenmore Plant

To Whom It May Concern:

This letter provides the Notice of Construction (NOC) permit application for several changes at the Cadman Materials (Cadman) asphalt plant in Kenmore, Washington. Cadman is filing this NOC application under the procedures of Washington Administrative Code (WAC) 173-400-114 for "replacement or substantial alteration of emission control technology at an existing stationary source." The application responds to Puget Sound Clean Air Agency (PSCAA) Notice of Violation (NOV) #3-009870, issued on March 16, 2019, and subsequent correspondence with PSCAA.

NOV #3-009870 listed four changes at the Kenmore plant for further review. The following three changes are covered in this application (with the other change addressed in a separate letter):

- Dryer shell replacement[1]
- Dryer baghouse alterations[2]
- Routing the scavenger duct from truck loading process to baghouse
- Installation of CEI Enterprises condenser filters on heated asphalt tanks

The following sections describe the NOC applicability of each of these changes, and provide information for a NOC application under the provisions of WAC 173-400-114 for the baghouse alterations and condenser filters. Items 2 and 3 both relate to changes that affected the dryer baghouse ducting system. This application addresses those changes together in the same section.

An NOC Application Form P is provided as Attachment 1, and a State Environmental Policy Act (SEPA) Checklist as Attachment 2.

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[1] The NOV referred to the change as a "new dryer." In actuality, the change was a maintenance project involving replacement of the shell of the dryer, but not a new dryer.

[2] The NOV referred to the changes as a baghouse replacement. The changes were actually alterations of the existing baghouse and not a replacement.

DRYER MAINTENANCE

In April 2008, Cadman replaced the shell of the dryer, along with several of the "stages" within the dryer (guides attached to the shell that help move the processed material forward in the dryer. The dryer shell was the same make and model before and after the change (H&R Mechanical 8 ft. x 30 ft.). Other components of the dryer (e.g., the burner, ductwork, drive system, shrouds, and aggregate chutes) were unchanged and reinstalled in the new shell. This change is not a modification that would trigger NOC permitting because it does not result in an increase in hourly potential emissions. Additionally, since only a portion of the dryer was replaced, the change is not considered an entirely new dryer. Though the NOC program does not use the concept of "reconstruction" under the federal New Source Performance Standards (NSPS) program, PSCAA, in correspondence about the dryer changes, has recommended the use of the NSPS "reconstruction" test for assessing whether the change should be considered a new dryer. Under NSPS regulations, a source is considered to be reconstructed if the fixed capital cost of the changes is more than 50 percent of the fixed capital cost of constructing an entirely new source. Costs for the dryer shell replacement were approximately $50,000, which is less than 50 percent of the cost of an entirely new dryer. Therefore, no NOC application is required for the dryer changes.

DRYER BAGHOUSE SYSTEM AND SCAVENGER DUCT

The dryer baghouse at the Kenmore plant was originally installed under an NOC application and permit filed in 1972. Since that time, a number of changes have been made that altered the configuration of the baghouse system. PSCAA has concluded that the scope of these changes is sufficient to constitute substantial alteration of an emission control device and require a NOC application to be filed under WAC 173-400-114. A summary of historical changes to the baghouse is provided below.

- In January 2006, H&R Mechanical retrofitted the baghouse to accommodate 44 rows of 15 6"x12' bags (660 bag capacity). The purpose of the change was to allow the Kenmore plant to use the same size of bags as those used at the company's other facilities. In order to accommodate the longer bags, a 4-foot extension was added to the top of the baghouse.
- In December 2007, Cadman replaced the baghouse exhaust fan with a new H&R Blower Model 74RT exhaust fan. This change was reviewed by PSCAA in 2010 and determined not to trigger NOC requirements.
- In May 2009, Cadman modified ductwork for collection of emissions from the truck load-out, including a new pick-up hood. The previous configuration routed emissions from the truck load-out through the dryer and from there to the dryer baghouse. After the changes, emissions from the truck load-out collection point connected to the dryer exhaust duct after the dryer. Though the configuration changed, the truck load-out collection point was routed to the dryer baghouse both before and after the change.
- In April 2016, Cadman replaced the tube sheet with a stainless steel tube sheet and installed all new bags, cages, and a new batter wall. In addition, the baghouse body was shortened, resulting in a surface area of cloth comparable to the original design of the baghouse. The PSCAA fabric filter NOC application form is included as Attachment 3. Specifications for the baghouse and bags are included in Attachment 4.

ASPHALT TANK CONDENSERS

The Kenmore facility operates two heated asphalt tanks. In April 2011, both asphalt tanks were fitted with condensing filters. In 2017, due to problems with corrosion, the condensing filter on the primary tank needed to be replaced. In response, the filter from the smaller tank was relocated to the primary tank and a new filter was ordered for the secondary tank. The new filter was installed in August 2017.

Though the condenser installations reduced emissions of air pollutants, because they represent installation of new emission controls they fall under "replacement or substantial alteration of a control device" provisions of the NOC regulations and thus require an NOC under WAC 173-400-114. Cadman has not identified a PSCAA application form for this particular type of equipment. Documentation describing the condensing filters is included as Attachment 5.

If you have any questions or comments about the information presented in this application, please do not hesitate to call me at (425) 961-7325.

Sincerely,

CADMAN MATERIALS

Christy McDonough
Environmental Manager

Cc: Aaron Day, Trinity Consultants

ATTACHMENT 1

PSCAA NOC Application Form P

RECEIVED
JUL 01 2019
Puget Sound Clean Air Agency

pscleanair.org
Puget Sound Clean Air Agency

AGENCY USE ONLY	NOC#:	REG#:	Date Fee Pd:	Eng. Assigned:
	18061	16101	7/1/19	

Puget Sound Clean Air Agency
1904 Third Avenue, Suite 105 | Seattle, WA 98101-3317
Phone 206-343-8800 | 206-343-7522 Fax

Need assistance? Free translation services available at 206-343-8800
Español 中文 Tiếng Việt 한국어 Tagalog русский

NOTICE OF CONSTRUCTION APPLICATION FOR ORDER OF APPROVAL

The following information must be submitted as part of this application packet before an Agency engineer is assigned to review your project.

SECTION 1. FACILITY INFORMATION

Business Name Cadman Materials			
Equipment Installation Address 6431 NE 175th Street	City Kenmore	State WA	Zip 98155
Is the business registered with the Agency at this equipment installation address? ☒ Yes. Current Registration or AOP No. 16101 ☐ No, not registered ☐ Unknown			
Business Owner Name Cadman Materials			
Business Mailing Address 7554 185th Ave NE, Suite 100	City Redmond	State WA	Zip 98052
Type of Business Construction Materials			
NAICS Code 324121	NAICS Description Asphalt Paving Mixture and Block Manufacturing		
Contact Name (for this application) Christy McDonough	Phone 425-698-3226	Email christy.mcdonough@lehighhanson.com	
Provide a 1-2 sentence simple description of this project: Project is related to plant maintenance activities which have occurred at the plant.			

SECTION 2: REQUIRED APPLICATION PACKET ATTACHMENTS

1) **$1,150 filing fee** (nonrefundable)
   ☒ PAY BY CHECK – Attached and made payable to **Puget Sound Clean Air Agency**
   ☐ PAY BY CREDIT – Accounting technician will contact person identified below for payment information

Contact Name:	Contact Number:

2) **Detailed Project Description**
   The project description must include a detailed description of the project, a list of process and control equipment to be installed or modified, a description of how the proposed project will impact your existing operations (if applicable), and measures that will be taken to minimize air emissions.

   Detailed description of the proposed project included in packet?
   ☒ YES, attached. ☐ NO, not attached. This application is incomplete.

PAID 7-1-19
AMOUNT 1,150.00
CK. NO. 21522061
RCPT. NO. 100401

NOTICE OF CONSTRUCTION APPLICATION FOR ORDER OF APPROVAL

SECTION 2: REQUIRED APPLICATION PACKET ATTACHMENTS (CONT)

3) **Process flow diagram**
☒ YES, attached. ☐ NO, not attached. This application is incomplete

4) **Emission estimate**. Emission rate increases for all pollutants.
☐ YES, attached. ☐ NO, not attached. This application is incomplete.

5) **Environmental Checklist** (or a determination made by another Agency under the State Environmental Policy Act)
www.pscleanair.org/DocumentCenter/View/170
☒ YES, attached. ☐ NO, not attached. This application is incomplete..

6) Attach **equipment form**(s) applicable to your operation. Forms are available online at
www.pscleanair.org/179/Apply-for-Notice-of-Construction-Permit
☐ YES, attached. ☐ NO, not attached. This application is incomplete.

SECTION 3: PROCESS AND CONTROL EQUIPMENT (attach additional pages if necessary)

Process Equipment		Does this equipment have air pollution control equipment?	**Air Pollution Control Equipment**	
# of Units	Equipment Type & Design Capacity		# of Units	Equipment Type
		☐ Yes ☐ No		
		☐ Yes ☐ No		
		☐ Yes ☐ No		

SECTION 4: CERTIFICATION STATEMENT

I, the undersigned, certify that the information contained in this application and the accompanying forms, plans, specifications, and supplemental data described herein is, to the best of my knowledge, accurate and complete.

Signature

Date 7/1/19

John Ross
Printed Name

Area Manager, Asphalt
Title

SECTION 5: APPLICATION SUBMITTAL

☒ **EMAIL application and attachments to:**
NOC@pscleanair.org

-OR-

☒ **MAIL application, payment, and attachments to:**
Puget Sound Clean Air Agency
ATTN: NOC Application Submittal
1904 3rd Ave, Suite 105 - Seattle, WA 98101

THIS SECTION FOR AGENCY USE ONLY						
Eng. Assigned (Compliance Mgr)	Eng. Rec'd (Eng)	Web description (Eng)	Completeness review (Eng)	Routed for OA Prep (Eng)	OA signed (Compliance Mgr)	OA mailed (Admin)
Date:	Date:	Date:	Date:	Date:	Date:	Date:

ATTACHMENT 2

SEPA Checklist

ENVIRONMENTAL CHECKLIST

Date: _____

Proponent: Puget Sound Clean Air Agency

Project, Brief Title: Cadman Kenmore Plant Maintenance

Purpose of Checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for Applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of Checklist for Nonproject Proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of Sections A, B, and C plus section D: Supplemental Sheet for Nonproject Actions.

Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Section B: Environmental Elements that do not contribute meaningfully to the analysis of the proposal.

pscleanair.org
Puget Sound Clean Air Agency

Puget Sound Clean Air Agency
1904 Third Avenue, Suite 105 | Seattle, WA 98101-3317
Phone 206-343-8800 | 206-343-7522 Fax

ENVIRONMENTAL CHECKLIST

Because of the State Environmental Policy Act, the action for which you are filing a Notice of Construction and Application for Approval to this Agency requires the completion of an environmental checklist.

BUT: If you can answer "yes" to either of the following statements with respect to the action being proposed, the attached checklist need not be completed:

1. I have obtained a State, City, or County Permit and filled out an environmental checklist.

   ☒ **Yes** ☐ **No**

   If yes, complete the following:

   State, City or County Department: _____

   Date the checklist was completed: _____

   Attach a copy of the checklist

2. An environmental checklist or assessment has previously been filled out for another agency.

   ☐ **Yes** ☐ **No**

   If yes, complete the following:

   Agency: _____

   Date the checklist was completed: _____

   Attach a copy of the checklist

If your answers are NO to both of the above statements, you must complete the attached environmental checklist.

Prepared by:

Signature _____

Name John Ross

Position Area Manager, Asphalt

Agency/Organization Cadman Materials

Date Submitted 7-1-19

ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. Name of proposed project, if applicable: Cadman Kenmore Plant Maintenance			
2. Name of Applicant Cadman Materials			
3. Applicant Address 7554 185th Avenue NE, Suite 100	City Kenmore	State WA	Zip 98155
Applicant Phone 425-867-1234	Applicant Email		
Contact Person Christy McDonough	Title Area Manager, Asphalt		
Company/Firm Lehigh Hanson (Cadman)			
4. Date Checklist Prepared	**5.** Agency Requesting Checklist PSCAA		
6. Proposed timing or schedule (including phasing, if applicable). Work is complete.			
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? ☐ Yes ☐ No. If yes, explain.			
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. N/A			
9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? ☐ Yes ☐ No. If yes, explain.			
10. List any government approvals or permits that will be needed for your proposal, if known. PSCAA NOC			

ENVIRONMENTAL CHECKLIST

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

6431 NE 175th Street, Kenmore, WA 98155
Parcel #1126049020
King County Legal Description: LOT B KENMORE BLA #BLA2003-011 REC #20040318900001 SD BLA BEING POR GL 1 & 2 & 5 STR 11-26-4 TGW 2ND CL SH LDS LY SLY OF NE 175TH ST

ENVIRONMENTAL CHECKLIST

B. ENVIRONMENTAL ELEMENTS

1. EARTH

a. General description of the site:

☐ flat ☐ rolling ☐ hilly ☐ steep slopes ☒ mountains

☒ other _____

b. What is the steepest slope on the site (approximate percent slope)?

Site is flat.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Site is paved.

d. Are there surface indications or history of unstable soils in the immediate vicinity? ☐ Yes ☒ No. If yes, describe.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

n/a

f. Could erosion occur as a result of clearing, construction, or use? ☐ Yes ☒ No. If yes, generally describe.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Project will not affect amount of impervious surface on site.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

n/a

ENVIRONMENTAL CHECKLIST

2. AIR

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke, greenhouse gases) during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities, if known.

Changes to the dryer baghouse are not expected to increase emissions. The addition of condensers to the asphalt tanks decreased VOC emissions from those tanks. Cadman is applying for Notice of Construction approval from the Puget Sound Clean Air Agency for these changes.

b. Are there any off-site sources of emissions or odor that may affect your proposal? ☐ Yes ☒ No.
If yes, generally describe.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

The proposed project involves installation or alteration of emission control devices, and will not increase air emissions.

3. WATER

a. Surface

1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands) ? ☒ Yes ☐ No. If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Lake Washington borders the site on the south.

2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? ☐ Yes ☒ No. If yes, please describe and attach available plans.

3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

n/a

4. Will the proposal require surface water withdrawals or diversions? ☐ Yes ☒ No.
Give general description, purpose, and approximate quantities if known.

5. Does the proposal lie within a 100-year floodplain? ☐ Yes ☒ No. If yes, note location on the site plan.

ENVIRONMENTAL CHECKLIST

6. Does the proposal involve any discharges of waste materials to surface waters? ☐ Yes ☒ No. If yes, describe the type of waste and anticipated volume of discharge.

b. Ground Water

1. Will groundwater be withdrawn from a well for drinking water or other purposes? ☐ Yes ☒ No. If yes, give a general description of the well, proposed uses and approximate quantities withdrawn from the well.

Will water be discharged to groundwater? ☐ Yes ☒ No. If yes, give general description, purpose, and approximate quantities, if known.

2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the systems, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

n/a

c. Water Runoff (including storm water)

1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? ☒ Yes ☐ No. If yes, describe.

Stormwater at the site is collected through surface flow and catch basins. It is directed through a treatment system prior to discharge to Lake Washington.

2. Could waste material enter ground or surface waters? ☐ Yes ☒ No. If yes, generally describe.

3. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? ☐ Yes ☒ No. If yes, describe.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, impacts, if any:

None proposed. Site will continue to comply with requirements of NPDES Sand and Gravel permit.

ENVIRONMENTAL CHECKLIST

4. PLANTS				
a. Check the types of vegetation found on the site:				
Deciduous Trees:	☐ Alder	☐ Maple	☐ Aspen	☐ other (specify):
Evergreen Trees:	☐ Fir	☐ Cedar	☐ Pine	☐ other (specify):
☐ Shrubs				
☐ Grass				
☐ Pasture				
☐ Crop or Grain				
☐ Orchards, Vineyards, or other permanent crops				
☐ Other types of Vegetation (specify):				
Wet Soil Plants:	☐ Cattail	☐ Buttercup	☐ other (specify):	
	☐ Bulrush	☐ Skunk Cabbage		
Water Plants:	☐ Water Lily	☐ Eelgrass	☐ Milfoil	☐ other (specify):
b. What kind and amount of vegetation will be removed or altered? None.				
c. List threatened or endangered species known to be on or near the site. None known.				
d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: n/a				
e. List all noxious weeds and invasive species known to be on or near the site. Himalayan blackberry is present along the shoreline.				

ENVIRONMENTAL CHECKLIST

5. ANIMALS

a. Indicate birds and other animals that have been observed on or near the site or are known to be on or near the site.

Birds:	☒ Hawk	☐ Heron	☐ other (specify):
	☒ Eagle	☒ Songbirds	
Mammals:	☐ Deer	☐ Bear	☐ other (specify):
	☐ Elk	☐ Beaver	
Fish:	☐ Bass	☐ Salmon	☐ Trout
	☐ Hearing	☐ Shellfish	☐ other (specify):

b. List any threatened or endangered species known to be on or near the site.

Chinook, coho, Kokanee, coastal cutthroat, and Dolly Varden/Bull trout are present in Lake Washington.

c. Is the site part of a migration route? ☒ Yes ☐ No. If yes, explain.

Pacific Flyway for migratory birds.

d. Proposed measures to preserve or enhance wildlife, if any:

None proposed.

e. List any invasive animal species known to be on or near the site.

None known.

6. ENERGY AND NATURAL RESOURCES

a. What kinds of energy (electric, natural gas, oil, woodstove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Electric and natural gas to support plant operations.

b. Would your project affect the potential use of solar energy by adjacent properties? ☐ Yes ☒ No. If yes, generally describe.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

None proposed.

ENVIRONMENTAL CHECKLIST

7. ENVIRONMENTAL HEALTH

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? ☐ Yes ☒ No.
If yes, describe:

2. Describe any known or possible contamination at the site from present or past uses.

None known.

3. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

None known.

4. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

Operations requires the use of oil for the production of asphalt. This material is stored in tanks within secondary containment.

5. Describe special emergency services that might be required.

None.

6. Proposed measures to reduce or control environmental health hazards, if any:

None proposed as part of the proposed project.

b. Noise

1. What types of noise exist in the area that may affect your project (for example, traffic, equipment, operation, other)?

None.

2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example, traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Project was completed during daylight working hours. No changes to plant operating hours proposed as a result of this project.

3. Proposed measures to reduce or control noise impacts, if any:

None proposed.

8. LAND AND SHORELINE USE

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? ☐ Yes ☒ No. If yes, describe.

Site currently supports an asphalt and a concrete batch plant. Surrounding uses are industrial.

b. Has the project site been used as working farmlands or working forest lands? ☐ Yes ☒ No. If yes, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

1. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? ☐ Yes ☒ No. If yes, how?

c. Describe any structures on the site.

Asphalt batch plant.
Concrete batch plant.

d. Will any structures be demolished? ☐ Yes ☒ No. If yes, what?

e. What is the current zoning classification of the site?

Regional Business (RB)

f. What is the current comprehensive plan designation of the site?

Regional Business

g. If applicable, what is the current shoreline master program designation of the site?

Downtown Waterfront (DW)

h. Has any part of the site been classified as a critical area by the city or community? ☒ Yes ☐ No. If yes, specify.

Seismic hazard.

i. Approximately how many people would reside or work in the completed project?

Project will not change current staffing levels at the site.

j. Approximately how many people would the completed project displace?

0

k. Proposed measures to avoid or reduce displacement impacts, if any:

None proposed.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

Site is a non-conforming use. No expansion or change in use is proposed. Project is specific to maintenance activities.

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:

None proposed.

9. HOUSING

a. Approximately how many units would be provided, if any? Indicate whether high- middle- or low-income housing.

n/a

b. Approximately how many units, if any, would be eliminated? Indicate whether high- middle- or low-income housing.

n/a

c. Proposed measures to reduce or control housing impacts, if any:

n/a

10. AESTHETICS

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

No structures proposed. Project is specifically maintenance activities on existing structures.

b. What views in the immediate vicinity would be altered or obstructed?

None.

c. Proposed measures to reduce or control aesthetic impacts, if any:

None proposed.

ENVIRONMENTAL CHECKLIST

11. LIGHT AND GLARE

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No

c. What existing off-site sources of light or glare may affect your proposal?

None

d. Proposed measures to reduce or control light and glare impacts, if any:

None proposed

12. RECREATION

a. What designated and informal recreational opportunities are in the immediate vicinity?

Water recreation occurs on Lake Washington. Public access trail is on north side of site.

b. Would the proposed project displace any existing recreational uses? ☐ Yes ☒ No. If yes, describe.

c. Proposed measures to reduce or control impacts on recreation, including recreational opportunities to be provided by the project or applicant, if any:

None proposed.

13. HISTORIC AND CULTURAL PRESERVATION

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? ☐ Yes ☒ No. If yes, specifically describe.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

None known.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

n/a

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

None proposed.

14. TRANSPORTATION

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on-site plans, if any.

Site is accessed via NE Bothell Way (WA522) and NE 175th Street.

b. Is site or affected geographic area currently served by public transit? ☒ Yes ☐ No. If yes, generally describe. If not, what is the approximate distance to the nearest transit stop?

Public transit available along WA522

c. How many parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

n/a

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? ☐ Yes ☒ No. If yes, generally describe (indicate whether public or private).

e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? ☐ Yes ☒ No. If yes, generally describe.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

None

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? ☐ Yes ☒ No. If yes, generally describe.

h. Proposed measures to reduce or control transportation impacts, if any:

None proposed.

15. PUBLIC SERVICES

a. Would the project result in an increased need for public services (for example, fire protection, police protection, public transit, health care, schools, other)? ☐ Yes ☒ No. If yes, generally describe.

b. Proposed measures to reduce or control direct impacts on public services, if any:

None proposed.

16. UTILITIES

a. Indicate utilities currently available at the site:

☒ Electricity	☒ Natural gas	☒ Water	☒ Refuse Service
☒ Telephone	☒ Sanitary Sewer	☐ Septic System	☐ Other (specify):

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity that might be needed.

Project does not impact utilities.

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.	
Signature	John Ross
Name	John Ross
Position	Area Manager, Asphalt
Agency/Organization	Cadman Materials
Date Submitted	7-1-19

ENVIRONMENTAL CHECKLIST

D. SUPPLEMENTAL SHEET FOR NON-PROJECT ACTIONS

(Do not use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment in section B of this checklist.

When answering these questions, be aware of how the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substance; or production of noise?
Proposed measures to avoid or reduce such increases are:
2. How would the proposal be likely to affect plants, animals, fish, or marine life?
Proposed measures to protect or conserve plants, animals, fish, or marine life are:
3. How would the proposal be likely to deplete energy or natural resources?
Proposed measures to protect or conserve energy and natural resources are:
4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?
Proposed measures to protect such resources or to avoid or reduce impacts are:
5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Proposed measures to avoid or reduce shoreline and land use impacts are:
6. How would the proposal be likely to increase demands on transportation or public services and utilities?
Proposed measures to reduce or respond to such demand(s) are:
7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

ATTACHMENT 3

PSCAA Fabric Filter Application Form

pscleanair.org
Puget Sound Clean Air Agency

PUGET SOUND CLEAN AIR AGENCY

Additional Notice of Construction Application Requirements for

BAGHOUSES AND CARTRIDGE-TYPE DUST COLLECTORS

General

Equipment or Process Being Controlled: *Dryer, Scavenger Fan, Truck Load Out, Silo One, Silo Two (currently offline).*

Identify which of the following categories the project fits into:

4. Amendment to Existing Order of Approval Permit Conditions:
   Notice of Construction for substantial alteration of a control device, per WAC 173-400-114.

Estimated Hours of Operation (hr/day, day/wk, wk/yr): *24/7/52*

Estimated Installation Date:

January 2006, H&R Mechanical retrofitted the baghouse to accommodate 44 rows of 15 6"x12' bags (660 bag capacity). In order to allow for the longer bags, a 4-foot extension was added to the top of the baghouse.

April 2016, maintenance activities included replacing the tube sheet with a stainless steel tube sheet and installing all new bags, cages, and a new batter wall. In addition, the baghouse body was shortened.

Inlet Gas Stream Characteristics: *250*

Particulate Concentration (lb/hr, gr/acf, or gr/dscf): *0.05 gr/scf, based on original 1972 NOC application. Current filter media specification suggest actual emission are lower.*

Flowrate (acfm): *68,600 acfm*

2 Average Temperature (ºF)*: 250*

Maximum Temperature (ºF)*: 250*

Moisture (% by volume)*: Unknown*

Design *[Most design information is available from the manufacturer or vendor. Submittal of a brochure, scale drawing or process and instrumentation diagram will facilitate the review of the permit application]*

Make: *H&R Mechanical Systems*
Model*:* *H&R 8x30 (Custom Build)*

Filter Fabric Material: *14oz. AX Aramid (common brand: Nomex) felt*
Treatments: *Singed (SIMX) – The felt is singed on the dust cake side for improved cake release. The process involves exposing the surface fibers to an open flame that melts back the loose fiber ends to which dust particles could adhere.*

Filter Cleaning Method: *Reverse Pulse*

Air to Cloth Ratio:

68,600 acfm/7,290 ft^2 = 9.41:1

Baghouse Configuration*: Negative Pressure*

Method Used to Design/Size the Baghouse*: Unknown. The air-to -cloth ratio does fall within the typical range of 3-10ft/min for pulse jet baghouses.*

Stack

Stack Height*: 230" (19' 2")*

Stack Rectangular Dimensions (inches)*: 32.5"* x 38.5"

Exhaust Flowrate (acfm): 68,600

Exhaust Temperature (ºF): *250*

Distance to Nearest Property Line (ft): *9 ft*

Height, Length and Width of Buildings (ft): N/A

Operation and Maintenance

Method Used to Establish Cleaning Frequency: *Cleaning is actuated by a timer that starts with the plant. Frequency of cleaning was determined to maintain an acceptable differential pressure per manufacturer reccomendations.*

Describe Preventive Maintenance: *Monthly inspections are performed. Maintenance (e.g., bag repair) is completed as needed.*

Methods Used to Prevent Emissions From Handling and Disposal of Dust: *Dust is collected and incorporated into final asphalt product via enclosed augers.*

ATTACHMENT 4

Baghouse Specifications

H & R MECHANICAL SYSTEMS
2407 - 38TH STREET • EVERETT, WASHINGTON 98206
TELEPHONE: (425) 259-5026 • FAX: (425) 259-2734

DATE: 06-25-2019

QUOTE No: 2019-028

TO: Justin

FAX NO.: 425-

OF: Cadman Kenmore

FROM: Frederic Soulier

Reference: Plant equipment

Informational:

Your current drum is a, H&R 8x30.
Designed to be a drop-in replacement for your original 8' diameter H&R drum.

The bags, in your bag house, are a snap band top, drop in style.
Mat: 14oz. AX Aramid felt, self-supported, singed outside.
See attached cut sheet for bag material.

Sincerely,

H & R Mechanical Systems, Inc.

Frederic Soulier

TESTING OF BAGHOUSE FILTRATION PRODUCTS

SOUTHERN FELT SUMMARY OF RESULTS AT 6.6/1

DATE: 11/01/04

RUN ID.	**134-R2**
FABRIC DESIGNATION	**NX-13.5/5-US-1**
MANUFACTURER	**Southern Felt**
DUST FEED	**Pural NF**

VERIFICATION TEST RESULTS

Mean Outlet Particle Conc. PM 2.5 (gr/dscf)	0.0000582
Mean Outlet Particle Conc. Total mass (gr/dscf)	0.0000582
Initial Residual Pressure Drop (in. w.g.)	1.07
Change in Residual Pressure Drop (in. w.g.)	0.24
Average Residual Pressure Drop (in. w.g.)	1.22
Mass Gain of Filter Sample (g)	1.81
Average Filtration Cycle Time (s)	112
Number of Pulses	193

RESIDUAL PRESSURE DROP

At Start of:	
Conditioning Period (in. w.g.)	0.06
Recovery Period (in. w.g.)	0.96
Performance Test Period (in. w.g.)	1.07

REMOVAL EFFICIENCY (%)

Dust Conc (gr/dscf)	7.95
PM 2.5	99.99905 *
Total Mass	99.99927 **

* (Dust Concentration * 0.7735) - PM 2
Dust Concentr

** Dust Concentration - Tota
Dust Concentration

ATTACHMENT 5

Condenser Filter Specifications

CEI Enterprises, Inc.

P. O. Box 9156 Albuquerque, NM 87119
245 Woodward Road SE Albuquerque, NM 87102 505-842-5556 Fax 505-243-1422 www.ceienterprises.com

CEI ENTERPRISES
An Astec Industries Company

This quotation is provided for: Cemex
Quotation Number: REECQ1808
Quotation provided by: Richard Champion
Cell Phone #: 505-508-9037
Email: rchampion@ceienterprises.com

Date of quotation: 6/28/2017
ATTN: Justin Bauer
Phone: (425) 485-1737
Email: justind.bauer@cemex.com

Qty	Product	Description	Extended Price
1	TA.OF.12	Tank vent condenser 300 gpm. The condenser circulates fumes from liquid inside the tank through finned piping that rapidly cools the fumes causing them to condense, turn into liquid and drain back into the tank. Has proven to be free of disposal problems found on filter systems. Rated for 300 gpm. Special bottom tube sheet constructed of stainless steel. Customer to use existing mounting flange from 2011 CEI vent condenser installation. NOTES: Fume condensers require periodic maintenance. Annually the tubes should be cleaned out to avoid plugging the vent to the tank and rupturing the tank. Fume condensers do not eliminate odor, they only reduce visible emissions. Length 8' - 10 ½" Width 3' - 4 ½" Weight 793 lbs.	$8,383