Nailah Shami

Sent: Wednesday, February 10, 2021 8:33 AM
To: McDonough, Christy M (Redmond) USA
Cc: John Dawson
Subject: NOC #11861 Additional Information Required for SEPA

Good morning Christy,

As we continue reviewing your NOC application and associated SEPA checklist (dated January 21, 2021), the Agency has determined that we need additional information to complete review of your NOC application #11861 and SEPA checklist for our pending determinations.

1. Emission Inventory

    a. Hot oil tanks and heaters. The emission inventory omits the emissions from the storage tanks for asphaltic cement, associated heaters, and other facility storage tanks.
    b. The emission inventory for the dryer incorrectly lists several metals (arsenic, beryllium, cadmium, chromium, lead, manganese, nickel, and selenium) as not being TAPs and does not include an analysis the ASIL/SQERs for these compounds.
    c. The emission inventory for the dryer is missing emissions for antimony, barium, cobalt, copper, hexavalent chromium, phosphorus, silver, thallium, and zinc. Not all of these are TAPs but, they should be quantified.
    d. Odor is an emission that should be addressed. It is difficult the quantify but, one of several approaches could be made. In this case the main odor sources taking part of this permitting action are the hot asphalt storage tanks (part of this action due to the condenser replacement) and the truck loadout emissions form the baghouse (part of this action due to the replacement of the baghouse). Because odor is subjective and dependent on the location it is perceived, odor modeling should be conducted to address the impacts of odor as an air pollutant. There are several ways this might be carried out. The Cadman Woodinville facility as part of NOC 10462 used the approach of modeling specific odorous compounds the demonstrate that potential odor impacts while not zero were infrequently expected. However, it has been eight years since that analysis and it may also be possible to identify Odor Unit measurement information for asphalt cement and model it through that means.

2. PM2.5 emissions are shown as 14.22 TPY. Given the proximity of the fence-lines and that this annual emission rate is greater than the emission thresholds in WAC 173-400-030 the Agency believes dispersion modeling to demonstrate compliance with the NAAQS is necessary.

3. SEPA Checklist. The City of Kenmore upon reviewing the SEPA checklist stated, “In 2009, Cadman rerouted emissions from its truck load out directly to the baghouse. Prior to then, these emissions were routed through the dryer, where odor causing constituents may have been more effectively treated via burning than they are now that they are routed directly to the baghouse.” Provide a discussion of the configuration of the truck loadout before and after the 2009 modification. Diagrams of what existed before and after will be helpful to the City, Agency, and Public to understand the nature of this change.

4. SEPA Checklist. Section B.2.a. The SEPA checklist also does not address odor. Please provide an updated checklist that addresses the possible ambient impacts from potential odor sources. This may rely on analysis such as described above in item 1.d and/or other qualitative assessments/discussions. This should include the changes to the truck loadout made in 2009. In particular, this analysis should address how the 2009 truck load out changes affected odor impacts frrm the truck loadout. The City of Kenmore upon reviewing the SEPA checklist is

concerned that the 2009 change to the truck loadout may have increased odor impacts.

5. SEPA Checklist. Section B.2.a. The SEPA checklist does not address greenhouse gases. A calculation of greenhouse gases should be added to the application emission inventory.

6. SEPA Checklist. Section B.2.b. The 2009 installation of the 2009 pickup for the truck loadout is intended to capture emissions due to loading of the trucks. This should also affect the overall emissions from loaded truck offsite. Provide an assessment of the change in impact of asphalt odors from offsite truck traffic due to the installation of in 2009 of the pickup to capture truck loadout emissions.

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