



April 12, 2018

Ms. Lynnette Haller, P.E.  
Washington State Department of Ecology  
Central Regional Air Quality Program  
1250 West Alder Street  
Union Gap, WA 98903

Re: Notice of Construction Modification  
Order No. DE 93AQ-C163, Fifth Revision  
Roosevelt Regional Landfill, Ash Monofill  
Project No. 0120-662-50-21-00

Dear Ms. Haller:

On behalf of our client, Regional Disposal Company (RDC), Weaver Consultants Group is submitting the attached Notice of Construction Application, along with a check in the amount of \$200.00 for the initial fee. The application requests a modification to the Notice of Construction Order (NOC) No. DE 93AQ-C163, Fifth Revision (permit) for Roosevelt Regional Landfill (RRLF), ash monofill, issued on October 23, 2017 by the Washington State Department of Ecology.

RDC is seeking to change the following permit conditions:

**Current Permit Condition 3.1.1:**

As currently permitted, the ash monofill will cover approximately 33 acres and will be constructed in stages over a projected 25-year life. The size of each cell shall be limited to 10 acres. No more than one cell shall be in operation at any one time. No more than 4.6 acres of ash shall be exposed at one time. Deviations(s) from the above description may require approval by Ecology of separate Notice(s) of Construction.

**Requested Permit Condition 3.1.1:**

Ash monofill limited to 33 acres, 40-year life from the date of this renewal application, ten (10) acre area. No more than 4.6 acres of ash shall be exposed at one time.

**Current Permit Condition 3.2.2:**

PM<sub>10</sub> monitoring shall be conducted at the downwind property line. Sampling for PM<sub>10</sub> shall be conducted each sixth day. Monitored PM<sub>10</sub> values shall not exceed 150 µg/m<sup>3</sup>, on a 24-hour basis.

**RECEIVED**

**APR 13 2018**

Dept of Ecology  
Central Regional Office

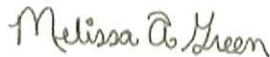
**Requested Permit Condition 3.2.2:**

PM<sub>10</sub> monitoring shall be conducted at the downwind property line. Sampling for PM<sub>10</sub> shall be conducted each twelfth day. Monitored PM<sub>10</sub> values shall not exceed 150 µg/m<sup>3</sup>, on a 24-hour basis.

On December 13, 2017, RDC submitted an Air Operating Permit Renewal Application that included these same changes as modifications to permit conditions 6.3.1 and 6.3.3 of the site's Air Operating Permit No. 14AQ-C182.

If you have any questions or comments regarding these proposed alternatives, please feel free to contact Art Mains at 509.384.5641.

Sincerely,  
**Weaver Consultants Group**



Melissa Green  
Senior Project Manager



John Briest, P.E.  
Principal

Attachment

cc: James Rivard, Washington State Department of Ecology, Central Regional Office  
Art Mains, Regional Disposal Company



## Notice of Construction Application

A notice of construction permit is required before installing a new source of air pollution or modifying an existing source of air pollution. This application applies to facilities in Ecology's jurisdiction. Submit this application for review of your project. For general information about completing the application, refer to Ecology Forms ECY 070-410a-g, "Instructions for Ecology's Notice of Construction Application."

Ecology offers up to 2 hours of free pre-application help. We encourage you to schedule a pre-application meeting with the contact person specified for the location of your proposal (see below). For more help than the initial 2 free hours, submit Part 1 of the application and the application fee. You may schedule a meeting with us at any point in the process.

Completing the application, enclose it with a check for the initial fee and mail to:

**WA Department of Ecology  
Cashiering Unit  
P.O. Box 47611  
Olympia, WA 98504-7611**

*For Fiscal Office Use Only:*  
001-NSR-216-0299-000404

Check the box for the location of your proposal. For help, call the contact listed below.	
Ecology Permitting Office	Contact
<input checked="" type="checkbox"/> <b>CRO</b> <b>Chelan, Douglas, Kittitas, Klickitat, or Okanogan County</b> Ecology Central Regional Office – Air Quality Program	Lynnette Haller (509) 457-7126 <a href="mailto:lynnette.haller@ecy.wa.gov">lynnette.haller@ecy.wa.gov</a>
<input type="checkbox"/> <b>ERO</b> <b>Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla, or Whitman County</b> Ecology Eastern Regional Office – Air Quality Program	Jolaine Johnson (509) 329-3452 <a href="mailto:jolaine.johnson@ecy.wa.gov">jolaine.johnson@ecy.wa.gov</a>
<input type="checkbox"/> <b>NWRO</b> <b>San Juan County</b> Ecology Northwest Regional Office – Air Quality Program	Dave Adler (425) 649-7267 <a href="mailto:david.adler@ecy.wa.gov">david.adler@ecy.wa.gov</a>
<input type="checkbox"/> <b>IND</b> <b>Kraft and Sulfite Paper Mills and Aluminum Smelters</b> Ecology Industrial Section – Waste 2 Resources Program Permit manager: _____	James DeMay (360) 407-6868 <a href="mailto:james.demay@ecy.wa.gov">james.demay@ecy.wa.gov</a>
<input type="checkbox"/> <b>NWP</b> <b>U.S. Department of Energy Hanford Reservation</b> Ecology Nuclear Waste Program	Phil Gent (509) 372-7983 <a href="mailto:phil.gent@ecy.wa.gov">phil.gent@ecy.wa.gov</a>

To request ADA accommodation, call (360) 407-6800, 711 (relay service), or 877-833-6341 (TTY).



## Notice of Construction Application

Check the box for the fee that applies to your application.

### New project or equipment

<input type="checkbox"/>	<b>\$1,500: Basic project</b> initial fee covers up to 16 hours of review
<input type="checkbox"/>	<b>\$10,000: Complex project</b> initial fee covers up to 106 hours of review

### Change to an existing permit or equipment

<input checked="" type="checkbox"/>	<b>\$200: Administrative or simple change</b> initial fee covers up to 3 hours of review Ecology may determine your change is complex during completeness review of your application. If your project is complex, you must pay the additional \$675 before we will continue working on your application.
<input type="checkbox"/>	<b>\$875: Complex change</b> initial fee covers up to 10 hours of review
<input type="checkbox"/>	<b>\$350 flat fee: Replace or alter control technology equipment (WAC 173-400-114)</b> Ecology will contact you if we determine your change belongs in another fee category. You must pay the fee associated with that category before we will continue working on your application.

Read each statement, then check the box next to it to acknowledge that you agree.

<input checked="" type="checkbox"/>	The initial fee you submitted may not cover the cost of processing your application. Ecology will track the number of hours spent on your project. If the number of hours Ecology spends exceeds the hours included in your initial fee, Ecology will charge you \$95 per hour for the extra time.
<input checked="" type="checkbox"/>	You must include all information in this application. Ecology may not process your application if it does not include all the information requested.
<input checked="" type="checkbox"/>	Submittal of this application allows Ecology staff to inspect your facility.



## Notice of Construction Application Part 1: General Information

### I. Project, Facility, and Company Information

1. Project Name Roosevelt Regional Landfill	
2. Facility Name Roosevelt Regional Landfill	
3. Facility Street Address 500 Roosevelt Grade Rd, Roosevelt, WA 99356	
4. Facility Legal Description The source is located at 500 Roosevelt Grade Road, in Roosevelt Washington within Sections 22, 23, 26, 27, 28, 33, and 34, Township 4 North, Range 21 East, W.M., Klickitat County.	
5. Company Legal Name (if different than Facility Name) Regional Disposal Company	
6. Company Mailing Address (street, city, state, zip) 500 Roosevelt Grade Rd, Roosevelt, WA 99356	

### II. Contact Information and Certification

1. Facility Contact Name (who will be on-site) Don Tibbetts	
2. Facility Contact Mailing Address (if different than Company Mailing Address) P.O. Box 338, Roosevelt, WA 99356	
3. Facility Contact Phone Number 509-384-5641	4. Facility Contact Email dtibbets@republicservices.com
5. Billing Contact Name (who should receive billing information) Don Tibbetts	
6. Billing Contact Mailing Address (if different than Company Mailing Address)	
7. Billing Contact Phone Number 509-384-5641	8. Billing Contact Email dtibbets@republicservices.com
9. Consultant Name (optional – if 3rd party hired to complete application) Melissa Green	
10. Consultant Organization/Company Weaver Consultants Group	
11. Consultant Mailing Address (street, city, state, zip) 7430 E Caley Ave, Suite 110, Centennial, CO 80111	
12. Consultant Phone Number 720-529-0132	13. Consultant Email mgreen@wcgrp.com
14. Responsible Official Name and Title (person responsible for project policy or decision-making) Don Tibbetts	
15. Responsible Official Mailing Address P.O. Box 338, Roosevelt, WA 99356	
16. Responsible Official Phone 509-384-5641	17. Responsible Official Email dtibbets@republicservices.com
18. Responsible Official Certification and Signature I certify that the information on this application is accurate and complete.	
Signature  _____ Date <u>4/3/18</u>	





## Notice of Construction Application

### Part 2: Technical Information

The Technical Information may be sent with this application to the Ecology Cashiering Unit, or may be sent directly to the appropriate Ecology office along with a copy of this application.

For all sections, check the box next to each item as you complete it.

#### III. Project Description

Attach the following to your application:

- Description of your proposed project
- Projected construction start and completion dates
- Operating schedule and production rates
- List of all major process equipment with manufacturer and maximum rated capacity
- Process flow diagram with all emission points identified
- Plan view site map
- Manufacturer specification sheets for major process equipment components
- Manufacturer specification sheets for pollution control equipment
- Fuel specifications, including type, consumption (per hour and per year), and percent sulfur

#### IV. State Environmental Policy Act (SEPA) Compliance

Check the appropriate box below.

- SEPA review is complete.  
Include a copy of the final SEPA checklist and SEPA determination (e.g., DNS, MDNS, EIS) with your application.
- SEPA review has not been conducted.
  - If SEPA review will be conducted by another agency, list the agency. You must provide a copy of the final SEPA checklist and SEPA determination before Ecology will issue your permit.  
Agency Reviewing SEPA:  

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  - If SEPA review will be conducted by Ecology, fill out a SEPA checklist and submit it with your application. You can find a SEPA checklist online at <http://www.ecy.wa.gov/programs/sea/sepa/forms.htm>.



## Notice of Construction Application

### V. Emissions Estimations of Criteria Pollutants

N/A - No requested changes to emissions estimations of criteria pollutants

Does your project generate air pollutant emissions?  Yes  No

If yes, provide the following information about your air pollutant emissions:

- Air pollutants emitted, such as carbon monoxide (CO<sub>2</sub>), lead (Pb), nitrogen dioxide (NO<sub>2</sub>), ozone (O<sub>3</sub>), and volatile organic compounds (VOC), particulate matter (PM<sub>2.5</sub>, PM<sub>10</sub>, TSP), sulfur dioxide (SO<sub>2</sub>)
- Potential emissions of criteria air pollutants in tons per hour, tons per day, and tons per year (include calculations)
- Fugitive air pollutant emissions – pollutant and quantity

### VI. Emissions Estimations of Toxic Air Pollutants

N/A - No requested changes to emissions estimations of Toxic Air Pollutants

Does your project generate toxic air pollutant emissions?  Yes  No

If yes, provide the following information about your toxic air pollutant emissions:

- Toxic air pollutants emitted (specified in WAC 173-460-150<sup>1</sup>)
- Potential emissions of toxic air pollutants in pounds per hour, pounds per day, and pounds per year (include calculations)
- Fugitive toxic air pollutant emissions - pollutant and quantity

### VII. Emission Standard Compliance

N/A - No requested changes to emission standard compliance

Does your project comply with all applicable standards identified?  Yes  No

- Provide a list of all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, and emission standards adopted under the Washington Clean Air Act, Chapter 70.94 RCW.

### VIII. Best Available Control Technology

N/A - No requested changes to best available control technology

- Provide a complete evaluation of Best Available Control Technology (BACT) for your proposal.

<sup>1</sup> <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-460-150>



## Notice of Construction Application

### IX. Ambient Air Impacts Analyses

Does your project cause or contribute to a violation of any ambient air quality standard or acceptable source impact level?  Yes  No

Provide the following: *N/A*

- Ambient air impacts analyses for criteria air pollutants (including fugitive emissions)
- Ambient air impacts analyses for toxic air pollutants (including fugitive emissions)
- Discharge point data for each point included in ambient air impacts analyses (include only if modeling is required)
  - Exhaust height
  - Exhaust inside dimensions (diameter or length and width)
  - Exhaust gas velocity or volumetric flow rate
  - Exhaust gas exit temperature
  - Volumetric flow rate
  - Discharge description (i.e., vertically or horizontally) and if there are any obstructions (e.g., raincap)
  - Emission unit(s) discharging from the point
  - Distance from the stack to the nearest property line
  - Emission unit building height, width, and length
  - Height of tallest building on-site or in the vicinity, and the nearest distance of that building to the exhaust
  - Facility location (urban or rural)