10/26/2026

RE: Permittee Name Change to Oakdell Farms, LLC

Order of Approval No. 20AQ-E046

The air permit for the facility above was issued to Oakdell Organics, LLC. Our NOC Application submitted in October of 2026, asked Ecology to change the permittee name to Richlawn Turf Food, LLC. Since then, our company has reorganized, and the final legal name for this permit is now Oakdell Farms, LLC.

We ask that Ecology:

Change the applicant name in the recently submitted NOC from Richlawn Turf Food, LLC to Oakdell Farms, LLC.

This is a name change only. Facility operations, equipment, production rates, emissions, and controls all stay as described in the NOC application. Oakdell Farms, LLC accepts all permit terms and conditions.

Please contact me if you need anything else. Thank you for your help.

Sincerely,

Emily Sahagun
Farm Compliance Manager- PNW
916-473-3457
esahagun@versova.com

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 two hours of free pre-application assistance. We encourage you to schedule a pre-application meeting with the contact person specified for the location of your proposal below. If you use up your two hours of free pre-application assistance, we will continue to assist you after you submit Part 1 of the application and the application fee. You may schedule a meeting with us at any point in the process.

Upon completion of the application, please enclose a check for the initial fee and mail it to:

Department of Ecology
Cashiering Unit
PO Box 47611
Olympia, WA 98504-7611

For Fiscal Office Use Only: 0299-3030404-B00-216-001-000404

Check the box for the location of your proposal. For assistance, call the appropriate office listed below:

Check Box	Permitting Authority	Contact Info
☐ CRO	**Chelan, Douglas, Kittitas, Klickitat, or Okanogan County** Ecology Central Regional Office – Air Quality Program 1250 West Alder Street; Union Gap, WA 98903	Central Region Reception 509-575-2490 airportablesourceCRO@ecy.wa.gov
☑ ERO	**Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla, or Whitman County** Ecology Eastern Regional Office – Air Quality Program 4601 North Monroe Street; Spokane, WA 99205	Air Quality Reception 509-329-3452 ecyaqciero@ecy.wa.gov
☐ IND	**Pulp Mills and Aluminum Smelters** Ecology Industrial Section P.O. Box 47600; Olympia, WA 98504-7600	ECY RE INDUSTRIAL SECTION (SWM) industrialsection@ECY.WA.GOV (360) 407-6868
☐ NWP	**Hanford Nuclear Reservation** Ecology Nuclear Waste Program 3100 Port of Benton Boulevard; Richland, WA 99354	Richland Field Office 509-372-7950 HanfordAir@ecy.wa.gov

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

New project or equipment:

- [x] **$2,256: Basic project** initial fee covers up to 16 hours of review.
- [ ] **$14,948: Complex project** initial fee covers up to 106 hours of review.

Change to an existing permit or equipment:

- [ ] **$423: Administrative or simple change** initial fee covers up to 3 hours of review. Ecology may determine that your change is complex during the completeness review of your application. If your project is complex, you must pay the additional fee before we continue working on your application
- [ ] **$1,410: Complex** change initial fee covers up to 10 hours of review
- [ ] **$415 flat fee**: Replace or alter control technology equipment under WAC 173-400-114. Ecology will contact you if we determine your change belongs to another fee category. You must pay the fee associated with that category before we will continue working on your application.

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

- [x] 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 exceeds the hours included in your initial fee, Ecology will bill you $141 per hour for the extra time.
- [x] You must include all information requested by this application. Ecology may not process your application if it does not include all the information requested.
- [x] Submittal of this application allows Ecology staff to visit and inspect your facility.

Part 1: General Information

I. Project, Facility, and Company Information

1. Project Name: Richlawn Turf Food- Fertilizer Plant
2. Facility Name: Richlawn Turf Food, LLC
3. Facility Street Address:

   1831 E Sagemoor Rd. Pasco, WA 99301

4. Facility Legal Description: THE NORTH HALF OF THE NORTHWEST QUARTER OF SECTION 34, TOWNSHIP 11 NORTH RANGE 30 EAST, WM
5. Company Legal Name (if different from Facility Name):

   _____

6. Company Mailing Address (street, city, state, zip)

   15121 CR 32 Platteville, CO 80561

II. Contact Information and Certification

1. Facility Contact Name (who will be onsite): Emily Sahagun
2. Facility Contact Mailing Address (if different than Company Mailing Address:

   _____

3. Facility Contact Phone Number: 916-473-3457
4. Facility Contact E-mail: esahagun@versova.com

5. Billing Contact Name (who should receive billing information):
   Crystal Noblett
6. Billing Contact Mailing Address (if different from Company Mailing Address):

7. Billing contact Phone Number: _____
8. Billing Contact E-mail: cnoblett@versova.com
9. Consultant Name (optional – if 3rd party hired to complete application elements):

   _____
10. Consultant Organization/Company: _____
11. Consultant Mailing Address (street, city, state, zip):
12. Consultant Phone Number: _____
13. Consultant E-mail: _____
14. Responsible Official Name and Title (who is responsible for project policy or decision making):
    Emily Sahagun
15. Responsible Official Phone: 916-473-3457
16. Responsible Official E-mail: esahagun@versova.com
17. Responsible Official Certification and Signature:

    I certify that the information on this application is accurate and complete.

Signature: Emily Sahagun Digitally signed by Emily Sahagun Date: 2026.06.18 09:41:05 -07'00' Date: 6/18/26

Part 2: Technical Information

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

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

III. Project Description

- [x] Written narrative describing your proposed project.
- [x] Projected construction starts and completion dates.
- [x] Operating schedule and production rates.
- [x] List of all major process equipment and manufacturers, and maximum rated capacity.
- [x] Process flow diagram with all emission points identified.
- [x] Plan a view site map.
- [x] Manufacturer specification sheets for major process equipment components
- [x] Manufacturer specification sheets for pollution control equipment.
- [x] Fuel specifications, including type, consumption (per hour and per year), and percent sulfur. N/A

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, and EIS) with your application.
- [x] SEPA review has not been conducted:
  - [ ] If 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: _____
  - [x] If the 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 https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-document-templates

V. Emissions Estimations of Criteria Pollutants

Does your project generate criteria for air pollutant emissions? ■ Yes ☐ No

If yes, please provide the following information regarding your criteria for emissions in the application.

- [x] The names of the criteria air pollutants emitted (i.e., NO_X, SO_2, CO, $PM_{2.5}$, PM_{10}, TSP, VOC, and Pb)
- [x] Potential emissions of criteria air pollutants in tons per hour, tons per day, and tons per year (include calculations)
- [x] If there will be any fugitive criteria pollutant emissions, clearly identify the pollutant and quantity

VI. Emissions Estimations of Toxic Air Pollutants

Does your project generate toxic air pollutant emissions? ☐ Yes ■ No

If yes, please provide the following information regarding your toxic air pollutant emissions in your application.

N/A

- [x] The names of the toxic air pollutants emitted (specified in WAC 173-460-150[1])
- [x] Potential emissions of toxic air pollutants in pounds per hour, pounds per day, and pounds per year (including calculations)
- [x] If there will be any fugitive toxic air pollutant emissions, clearly identify the pollutant and quantity

VII. Emission Standard Compliance

- [x] 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 Chapter 70A.15 RCW.

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

?

VIII. Best Available Control Technology

N/A

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

IX. Ambient Air Impacts Analyses

Please provide the following:

N/A

- [x] Ambient air impacts analyses for Criteria Air Pollutants (including fugitive emissions)

N/A

- [x] Ambient air impacts analyses for Toxic Air Pollutants (including fugitive emissions)

N/A

- [x] Discharge point data for each point included in air impacts analyses (including only if modeling is required)
  - [ ] Exhaust height
  - [ ] Exhaust inside dimensions (ex., diameter or length and width)
  - [ ] Exhaust gas velocity or volumetric flow rate
  - [ ] Exhaust gas exit temperature
  - [ ] The volumetric flow rate
  - [ ] Description of the discharges (i.e., vertically or horizontally) and whether there are any obstructions (ex., raincap)
  - [ ] Identification of the emission unit(s) discharging from the point
  - [ ] The distance from the stack to the nearest property line
  - [ ] Emission unit building height, width, and length
  - [ ] Height of the tallest building on-site or in the vicinity and the nearest distance of that building to the exhaust
  - [ ] Whether the facility is in an urban or rural location

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

To request an ADA accommodation, email aqpubs@ecy.wa.gov, call (360) 407-6800, or dial 711 to call through the Washington Telecommunications Relay for services like text telephone (TTY). Visit Ecology.wa.gov/ADA for more accessibility information.

[1] http://apps.leg.wa.gov/WAC/default.aspx?cite=173-460-150

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Richlawn Turf Food, LLC
1831 E Sagemoor Rd.
Pasco, WA 99301

Written Narrative Describing Proposed Project

The fertilizer plant previously registered under Oakdell Egg Farms will be renovated and operating under Richlawn Turf Food, LLC. Previously- Approval Order No. 20AQ- E046 and AQPID Number: A0210167. All building dimensions and property lines to remain the same.

All primary process equipment is electrically powered, so direct combustion emissions from the manufacturing operation is not anticipated. There is potential for minor particulate emissions at the pellet cooling and crumbling stages; however, those points are equipped with two large air cyclones designed to capture particulate before discharge. Emissions calculations are to be provided to account for all emission potentials.

We are renovating our existing poultry manure pelletizing operation to achieve the following objectives:

- Increase production capacity to 10 tons per hour
- Introduce fully automated bagging operations
- Eliminate dehydrated poultry manure as the primary feedstock and replace it with composted poultry manure
- Improve the pellet cooling process
- Add a pellet crumbling process to achieve fertilizer prill specification
- Add the ability to incorporate additional ingredients into fertilizer pellets
- Add ingredient storage capacity
- Transition from a batch-based system to a continuous flow manufacturing system

To accomplish these objectives, we will be removing existing equipment and replacing it with upgraded and higher-capacity systems as described below. Baghouses will remain in place.

Equipment Being Removed and Replaced
The following existing equipment will be removed and replaced with upgraded systems to support increased capacity, automation, and improved product quality:

- Qty 1: Paddle Mixer
  Replaced with Qty 1: Doyle 8-Ton Paddle Mixer
- Qty 1: Pellet Mill
  Replaced with Qty 2: CME R200 Pellet Mills
- Qty 1: Pellet Cooler
  Replaced with Qty 2: CME C12 Pellet Coolers including Cyclone and Blower Assemblies
- Qty 1: Screen Deck
  Replaced with Qty 1: Foresberg 48" x 12" x 10' two-ball deck stainless steel screen

These upgrades significantly increase pellet production throughput, improve pellet cooling efficiency, enhance material separation accuracy, and support continuous production at the targeted 10 tons per hour capacity.

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Equipment Being Removed and Not Replaced
The following equipment will be removed entirely and not replaced as part of the process redesign:

- Pellet holding tank (post pellet cooler)
  This component will be eliminated because the upgraded system will operate as a continuous flow system rather than a batch process.
- UV light conveyors
  With the transition from dehydrated poultry manure to composted poultry manure as the primary feedstock, this pathogen kill step is no longer required.

The removal of these components simplifies material flow, reduces process complexity, and improves overall system efficiency.

Equipment Being Added
The following equipment will be added to expand process capability, increase automation, and support fertilizer and soil product manufacturing:

- Qty 2: CME CRM660 Crumblers
  Pellets will be crumbled to fertilizer prill specification. These crumblers will be mounted beneath the CME C12 Pellet Coolers to maintain continuous material flow.
- Qty 1: New Leader 300 G4 Fertilizer Spreader, 304 Stainless Steel, Converted belt driven live bottom hopper to operate as a surge bin
- Qty 1: AWA Horizontal Form-Fill-Seal (FFS) Bagging Machine, Mild Steel Construction with 304 Stainless Steel Scale and Hopper
  This will provide a fully automated bagging and scale system dedicated to fertilizer manufacturing.
- Qty 1: Conveying Industries Fully Automated Palletizing Robot
  This robotic system will transfer finished bags from the bagging machines and place them onto pallets automatically.
- Qty 2: Cousins HP2100-SRT Pallet Wrappers
  These semi-automated pallet wrappers will secure finished pallet loads for shipment.

Projected construction starts and completion dates
- Old equipment demo projected start date: April 1
- Old equipment demo project scope end date: May 1
- Electrical and equipment install scope start date: Aug 17th
- Electrical and equipment install scope end date: Oct 9th
- Production start date: Nov 1st

Operating schedule and production rates
- Normal operating hours will be Monday – Friday from 7:00am – 5:00pm
- Fertilizer manufacturing capacity will not exceed 10 tons/hour