

Sedron Sumner Project's "Solid Waste and Odor Control and Response Protocols"

1. Frequency of Waste Dumpsters Replacement with Clean Dumpsters; Limits on Dumpster Use.

To reduce the potential for migration of dumpster odors from the Sedron site (the "Site"), the site operator, Sedron Services Sumner Washington, LLC (a company referred to below as the "Operator") shall have each and every solid waste dumpster containing putrescible material or other odor-emitting material emptied and cleaned no less than once every seven (7) calendar days. Waste dumpsters may not be used for storage of septage or biosolids imported to the Site.

2. Dumpster Lid Closure Requirements and Prohibition on Dumpsters Leaking Liquids.

To reduce the potential for migration of dumpster odors from the Site, the Operator shall ensure that at all times both:

- a) The lids of each and every solid waste dumpster on the Site that contains putrescible material and/or other odor-emitting material is closed when the dumpster is not in the process of having material placed in it, and
- b) Each and every solid waste dumpster on the Site containing putrescible or other odor-emitting material cannot leak any liquids from the enclosed container whatsoever to the environment.

3. Frequency and Method of Regular Odor Testing.

Once per day during site operations an employee will walk the property line and take odor readings with a Nasal Ranger at each property line and record findings at approximate locations shown in Exhibit 2. The daily odor reading will occur (when possible) while the site is in normal operation. On a monthly basis an employee that is not stationed at the Site will perform additional site walkarounds with a Nasal Ranger and fill out the same checklist after taking a reading at each property line. Items within this checklist are described in section 4 and shown in Exhibit 1. Any employee conducting perimeter odor testing will complete training to ensure they have an understanding an ability to perform accurate odor tests with an olfactory device such as the Nasal Ranger and shall show aptitude and ability to perform olfactory testing.

Upon startup of the site, an independent odor study will be conducted by an outside odor consultant. The consultant will be used as a resource for employees performing odor testing as necessary.

If any Monitoring Record along the Site's perimeter boundary notes a Nasal Ranger® field olfactometer dilution threshold (D/T) reading of 2 or more (a D/T reading of 2 dilutions shall be considered a "Detectable Odor Level") that can be attributed to operations at the site, then Sedron shall take corrective measures as detailed in Section 7 to reduce the extent of odor generated on the Site so that the odor will thereafter stay below a Detectable Odor Level at the Site's perimeter and off-site.

A dilution to threshold factor of 2 is meant to correspond to Odor Level 1 referenced in Puget Sound Clean Air Agency's [Regulation 1, Section 9.11](#). Furthermore, 2 dilutions correlates to position number 12 on the Nasal Ranger D/T Dial. More information regarding this scale can be found Exhibit 4.

4. Archiving, Maintenance, and Availability of Monitoring Records.

All Monitoring Records shall be (a) archived and (b) maintained by the Operator for a period of at least three (3) years in digital format. All new Monitoring Records shall be archived on the day of their creation by the Operator to avoid loss of any of the Monitoring Records. The Monitoring Records shall be maintained in compliance with all applicable federal, state, and local requirements and permits. In response to each request for records received by mail, hand-delivery, or by digital transmission from

- (a) The City of Sumner and/or
- (b) The Puget Sound Clean Air Agency and/or
- (c) Any other governmental jurisdiction or agency that has authority to make requests for records.

The Operator shall provide the requestor the requested records in a timely manner [not to exceed thirty (30) calendar days from the date of receipt of each such request] and in compliance with any and all applicable laws, statutes, ordinances, and agency regulations.

Records that shall be archived shall include event histories involving the Site and/or odor(s), documentation of each corrective action taken at the site, correspondence, emails, reports, maps, and other data. This shall include at a minimum: the date and time of inspection, employee who conducted inspection, and a checklist including locations and the readings at those locations, operational status of the site, and any events that were occurring that may impact readings. If any corrective action is taken, this will also be recorded along with any relevant weather and wind details. An example of the Checklist can be found in Exhibit 1.

5. Sedron Contact Information for Complaints; Duty to Keep Such Information Current.

The Operator will establish, and at all times maintain, a web-based portal for complaints to be submitted by the public as well as a telephone number for receiving complaints that will be checked daily. Information on access to these communication channels will be made available and kept current on the website, and on a placard at the entrance to the Site.

If and when any of the above contact information changes, Operator shall within two (2) business days following each such change both (i) update and repost the placard, and (ii) update the "Odor Control and Complaints Reporting" section on the Operator's website.

6. Protocols for Response to Odor Complaint and corrective measures.

If an odor complaint is made to the Operator, then, within twenty-four (24) hours of the complaint's receipt, the Operator will notify the City of Sumner of the complaint and the Operator shall have a Monitoring Employee both

- (a) Perform an additional Odor Inspection along the Site's perimeter boundaries and at the location of the complained-of odor described in the odor complaint and
- (b) Conduct a comprehensive analysis of site activities for the time period relevant to the complaint, and complete a Monitoring Record report summarizing the findings, and email the report to the Operator's management

Further, within the same twenty-four (24) hour period, the Operator shall email that Monitoring Record to (i) the party that submitted the complaint (the "Complainant") or, if directed by the Complainant, to (ii) the Complainant's representative, as well as the City of Sumner.

If the complained-of odor is confirmed by inspection,

- (1) the Operator shall immediately work to identify the source of the odor and take necessary corrective measures at the Site to reduce both the extent of the odor and possible odor risks so that the odor stays below a detectable level at the site boundaries;
- (2) The Operator shall (I) eliminate any odor excess within 24 hours of identification or (II) cease the facility's operations until all such excess(es) have been eliminated and the odor level at and beyond the site boundaries are below detectable levels; and
- (3) The Operator shall immediately communicate to the City of Sumner, the Puget Sound Clean Air Agency, and the Complainant(s) or each of the Complainant(s)' representatives (I) a planned

schedule for corrective measures to be taken once identified, (II) particular proposed corrective measures, and (III) the outcome of the implemented measures.

In addition, If the Operator is not able to identify the source of excess odor and take corrective actions to cure that odor in a timely fashion (as described in this section), the Operator shall immediately engage with a pre-identified professional third-party consulting firm specializing in odor mitigation to perform a study to (a) identify any known reasons for the excess odor and (b) identify proposed options for solutions to reduce odor to a level that is not detectable at or beyond the Site boundary.

The Operator shall work with the consultant to develop an implementation plan for corrective action. The schedule for corrective action plan shall be communicated to the City of Sumner and each of the Complainant(s) or each of the Complainant(s)' representative as soon as that plan has been developed.

7. Definition of "Corrective Measures."

The term "corrective measures" as referred to above means identification of source of odors and implementation of remedies at the Site consisting of:

- a) Needed maintenance of, repairs of, adjustments to, or replacement of equipment,
- b) Changes to handling operations, and
- c) Any other steps that may be needed to reduce odors to thereafter stay below a Detectable Odor Level at the boundaries of the Site and within any off-site properties during all atmospheric conditions including temperature inversions.

8. The Operator's Duty to Post at the Site a Placard of This Protocols Document.

The Operator shall reproduce the entirety of this protocols document on a placard and post the placard in a publicly accessible part of the Site's East Valley Highway frontage where it will be readable. The placard shall also include contact information for Operator staff, the City of Sumner Development Services Department, and the Puget Sound Clean Air Agency. The posted placard shall be immediately updated if and when any change(s) to that contact information or to any of the Operator contact information are made.

9. The Operator's Duty to Have This Protocols Document on the Operator's Website.

All the sections of this protocols document along with the contact information and the additional contact information contemplated to be included on the placard shall be maintained in an "Odor Control Information and Complaints Reporting" section of the Operator's website for public access. The Operator shall immediately update that section of the website when any change(s) to any of that contact information occur.

The Operator will communicate via website and email to the proper regulatory agencies and the City in the event that planned preventative maintenance and or corrective maintenance will be performed which may generate odors for a short period of time as a courtesy to the community. In order to limit the potential for odors during preventative or corrective maintenance, the Operator will conduct a clean-out process on the equipment planned to be worked on to ensure that the equipment is thoroughly cleaned before the maintenance tasks are conducted. The clean out process will include rinsing the equipment with clean water and capturing the rinse water with the onsite collection systems.

10. Compliance with Puget Sound Clean Air Agency NOC 11946

All Facility and Site operations must maintain compliance with the August 21,2020 ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH issued by the Puget Sound Clean Air Agency under the Notice Of Construction (NOC) Number 11946 and all of that order’s requirements and conditions. The Site will maintain full compliance with NOC 11946.

EXHIBIT 1 – ODOR INSPECTION LOG

Odor Inspection Checklist Example

Employee:			
Date & Time:			
Operational Status:			
Wind Direction & Speed:			
Temperature:			
Relative Humidity:			
Barometric Pressure:			
Weather Conditions:		Sunny – Partly Cloudy – Mostly Cloudy – Overcast – Hazy	
Precipitation:		None – Fog – Rain – Sleet – Snow	
Temperature Inversion? (Y/N)			
	Measured Dilution Threshold (D/T)	Descriptor/Comments	Corrective Action Needed? (Y/N)
Location 1:			
Location 2:			
Location 3:			
Location 4:			
Location 5:			

EXHIBIT 2 – MAP OF POTENTIAL ODOR MONITORING LOCATIONS

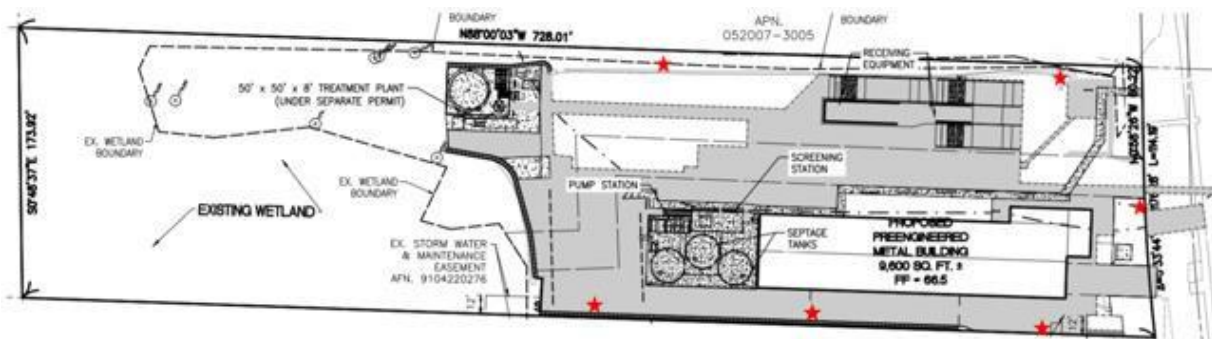


EXHIBIT 3 – ODOR DESCRIPTORS EXCERPT

Odor Descriptors

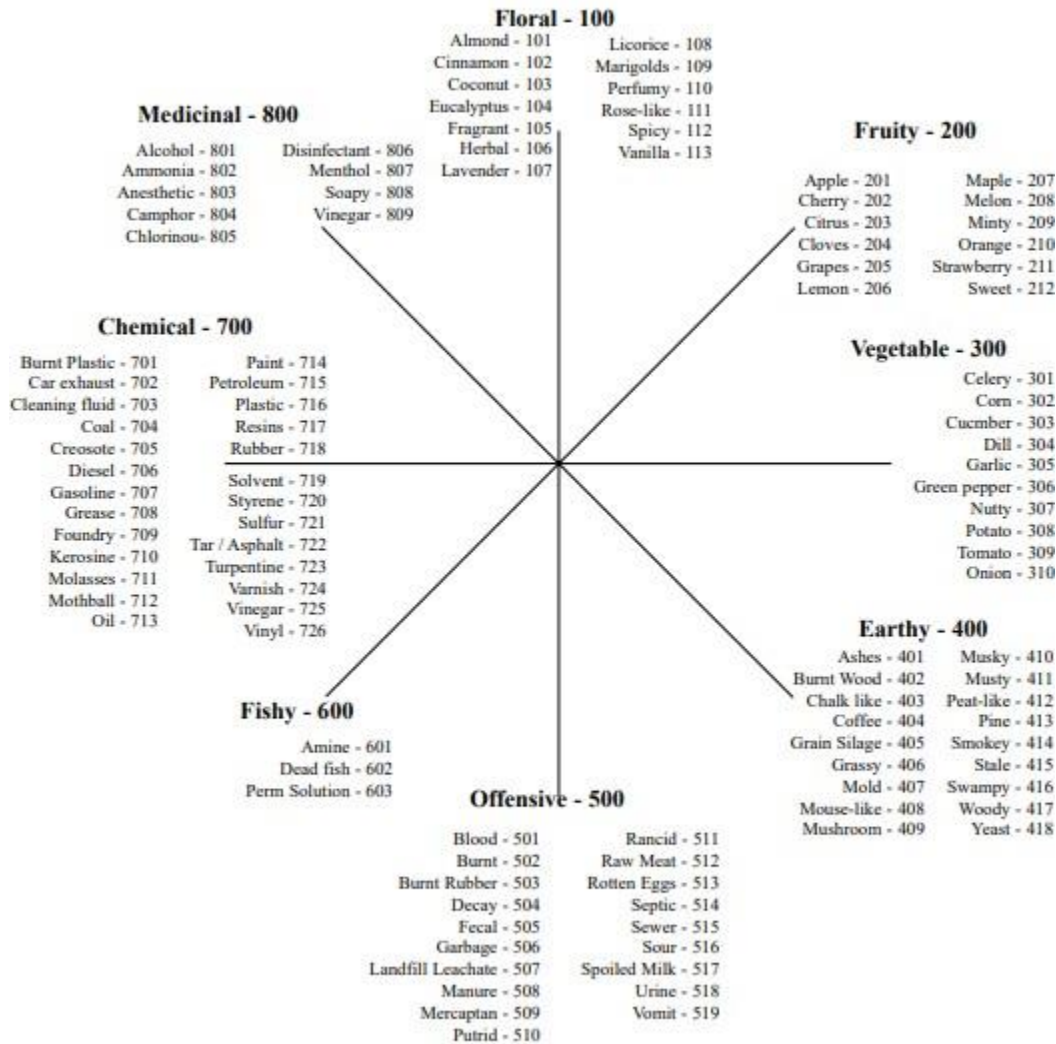


EXHIBIT 4 – DILUTION THRESHOLD MEASUREMENT EXCERPT

The rotational position of the Nasal Ranger D/T Dial determines the orifice size and, therefore, the volume of odorous air that enters through the selected orifice. A large orifice allows more odorous air through the D/T Dial to mix with odor-free filtered air. A small orifice allows less odorous air through the D/T Dial to mix with odor-free filtered air. The volume ratio of the filtered odor-free air and odorous air is called the Dilution-to-Threshold (D/T) ratio. The principle of field olfactometry calculates the “Dilution to Threshold” (D/T) ratio as:

$$\text{D/T} = \frac{\text{Volume of Carbon-Filtered Air}}{\text{Volume of Odorous Air}}$$

The D/T Dial contains twelve (12) orifice positions. Six (6) positions are “BLANK” positions for the user to inhale only odor-free filtered air. Alternating on the D/T Dial with the six “BLANK” positions are six “D/T” positions with discrete “Dilution-to-Threshold” (D/T) orifices with traceable calibration.

The following table summarizes the “Dilution-to-Threshold” (D/T) ratios on the standard Nasal Ranger® D/T Dial.

<u>Position Number</u>	<u>D/T</u>
1	Blank
2	60
3	Blank
4	30
5	Blank
6	15
7	Blank
8	7
9	Blank
10	4
11	Blank
12	2