



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 14, 2018

Ms. Paula Stoppler
Technical Director
Cosmo Specialty Fibers, Inc.
PO Box 539
Cosmopolis, WA 98537

Re: Solids Removal Study Engineering Report – Approval Letter

Dear Ms. Stoppler:

The Department of Ecology (Ecology) received the Solids Removal Study (SRS) Report dated May 14, 2018. The SRS Report is required under Administrative Order 15638 issued to Cosmo Specialty Fibers (Cosmo) on January 24, 2018. The purpose of the SRS Report is to evaluate the options to reduce solids in Cosmo's wastewater treatment system, which is expected to reduce the potential for violations of the limits in Cosmo's NPDES permit.

In the SRS Report, Cosmo proposes to enhance existing Clarifier #1 and install additional technology to increase solids removal from the clarifiers above the current capacity of 30,000 lbs/day. The facility proposes to conduct pilot tests on various technologies, prior to selecting and installing the final solids removal technology. In the interim, Cosmo proposes to bring in a rental unit to remove solids and send those solids to a landfill. Based on personal communication with you on July 2, 2018, Cosmo would like to utilize the interim measure on an as-needed basis. Cosmo also provided an update to the implementation schedule, as follows:

Action item	Date
Conduct pilot tests of solids removal technologies	June - Dec 2018*
Select final solids removal technology	Jan - Feb 2019
Install the selected solids removal technology	Sept 2019
Retrofit Clarifier #1, as needed**	Fall 2020

*Revised based on personal communication between Cosmo and Ecology on 7/2/18.

**Based on the further study of the treatment system performance.

Due to Cosmo's ongoing research and review, additional information and follow-up is necessary for final implementation. As such, Ecology approves the plan in the SRS Report and the above implementation schedule, with the following conditions:



- By November 1, 2018, Cosmo must submit for Ecology's approval the first Supplemental SRS Report for the interim solids removal.
 - The supplemental report must include, but is not limited to, the following: A description of the unit for interim solids removal, including the unit's solids removal capacity.
 - A schedule for installing and operating the interim unit.
 - Solids management and disposal plan for the removed solids. The plan must also include odor prevention measures.

- By March 15, 2019, Cosmo must submit for Ecology's approval the second Supplemental SRS Report with Cosmo's proposal of the final solids removal technology. The supplemental report must include evaluation of the following:
 - Results of the pilot tests, including the performance and efficiency of the solids removal technologies.
 - Capacity of the proposed technology to meet the 50,000 lb solids/day removal rate, based on low viscose production. Ecology strongly recommends that Cosmo also evaluate for higher removal capacity to accommodate grades with higher BOD loading.
 - Polymer/coagulant use, if the solids removed are to be burned on-site at the recovery boiler. Emissions from the boiler must be in compliance with state and federal air quality regulations.
 - Proposed management and disposal of the solids removed, including odor prevention measures.

- By July 1, 2020, Cosmo must submit for Ecology's approval the final Supplement SRS report. This report must include the results of the study for improvements of Clarifier #1.

In accordance to Order 15638, modifications proposed in report must be implemented within 30 days of Ecology's approval. As such, the implementation schedule is effective 30 days after the issuance of this approval letter.

If you have any questions regarding this letter, please contact me at (360) 407-6064 or htra461@ecy.wa.gov.

Sincerely,



Ha Tran
Industrial Section
Washington State Department of Ecology