



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

December 19, 2022

Kevin Scott, Plant Manager
Cosmo Specialty Fibers
PO Box 539
Cosmopolis, WA 98537

Re: Cosmo Specialty Fibers, Inc. (Cosmo) Pulp Mill Curtailment

Dear Kevin Scott:

The Department of Ecology received notification of Cosmo's upcoming curtailment, planned around December 21, 2022. Cosmo currently has an Air Operating Permit (AOP) no. WA0000809, a National Pollutants Discharge Elimination System (NPDES) permit no. WA0000809, as well as requirements associated with the Dangerous Waste Regulations WAC 173-303. These requirements remain in place during the curtailment. Below is a list of the requirements, including but not limited to:

- Air Operating Permit
 - Submittal of the semi-annual boiler MACT compliance reports that are due January 30th and July 30th of each year, per permit condition C.14. The semi-annual boiler MACT compliance report that was due on July 30, 2022 still has not been submitted.
 - Submittal of the air monthly reports, due on the 15th of every month per permit condition #34.
 - Submittal of the annual emissions inventory, due April 15 of each year, per condition #35.
 - Submittal of the Annual Compliance Certification, due April 15 of each year per condition #39.
 - Submittal of the Annual Greenhouse Gas emissions report, due March 31 of each year per condition I.1 through I.3.
 - Submittal of notification of cessation for Greenhouse Gas Reporting per WAC 173-441-050(3)(o).
 - Compliance with the fugitive emissions requirements permit condition. Potential sources of fugitive emissions may be wood chips or hogged fuel remaining on site.
 - Compliance with emissions testing and CEMS audits due to be completed during the last month and the last quarter of 2022.
 - Complete the registration for the Climate Commitment Act Cap-and-Invest auction. Information about the registration may be found here: <https://ecology.wa.gov/Air-Climate/Climate-Commitment-Act/Cap-and-invest/Auctions-and-trading/Trainings-and-Resources>.

- Bleach Plant/chlorine dioxide generator emissions. Ecology recommends that Cosmo review the processes associated with the recent release of chlorine dioxide and coordinate with us to plan for the minimization of similar releases prior to resuming operations.
- NPDES Permit
 - Compliance with the limits, monitoring, and discharge monthly reporting in the NPDES permit.
 - Repair of effluent pipe leak on 120 Huntley Street as soon as practicable.
 - Proper maintenance and operation of the aerators at the Westport ponds to minimize odors. Ecology noted during the inspections some of the aerators were down. These must be repaired and available for use.
 - Compliance with Order 21150 for the effluent line assessment and operations & maintenance plan.
- Dangerous Waste Regulations
 - Identification and designation of waste remaining on site per WAC 173-303. Any waste generated during shut down procedures or during curtailment must be properly characterized and managed.
 - Storage of both existing dangerous waste and any newly generated dangerous waste must not exceed the allowed accumulation limits or timeframes¹.
 - Stored dangerous waste must also continue to be properly managed and inspected per WAC 173-303.
 - Proper management of materials prior to curtailment. Please note that materials stored at the site over time may become wastes and potentially designate as dangerous waste under WAC 173-303. Dangerous wastes may include any red liquor, unused lab chemicals, or other materials that is speculatively accumulated.
 - Submittal of the annual waste report to Ecology, due March 1 of every year per WAC 173-303-390.
 - Submittal of the pollution prevention plan, as applicable by WAC 173-307.

If you have any questions or concerns regarding the facility's ability to comply with these requirements, please contact Ha Tran at ha.tran@ecy.wa.gov or (360) 790-6276.

Sincerely,



James DeMay, P.E.
 Industrial Section Manager
 Washington Department of Ecology

Cc: Paula Stoppler, Technical Director
 Erik Hiles, Environmental Engineer

¹ For storage accumulation limit, see Ecology's website here: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Dangerous-waste-basics/Accumulation>