

To: Agata McIntyre  
Engineering Manager  
Northwest Clean Air Agency  
1600 South Second Street  
Mount Vernon, WA 98273  
Or email:

Transmitted Via Email to: [agatam@nwcleanairwa.gov](mailto:agatam@nwcleanairwa.gov)

10 June 2025

**RE: Draft Regulatory Order to Limit Emissions from Existing Incinerators at Post Point Wastewater Treatment Plant**

Dear Ms. McIntyre,

Thank you for taking the time to consider our comment on the Regulatory Order 52 (RO 52) that establishes a limit on the emission of carbon monoxide from Sewage Sludge Incinerators 1 and 2 at Post Point Wastewater Treatment Plant (WWTP) in Bellingham, WA.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We mobilize people in Northwest Washington to build just and thriving communities and to protect the land, water and climate on which we all depend. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

On March 27, 2024, NWCAA sent a Notice of Violation for High Priority Violations to the City of Bellingham in regards to the Post Point WWTP. Three violations were listed:

- 1) Compliance with 60 Subpart LLLL standards
- 2) Failure to apply for and obtain NSR permit prior to burner replacements in 2021, 2022, and 2024.
- 3) Failure to submit the major source permit application addressing the major status of the facility with respect to carbon monoxide.

***The RO 52 partially addresses the first violation and does not address the second two violations. How and when will the remaining violations be addressed and why has it taken over a year to resolve?***

Concerns with carbon monoxide and other regulated pollutants (Violation #1):

A comprehensive compliance testing of the incinerators was performed in 2023 and revealed that the carbon monoxide readings were 27 times and 72 times higher than the

standards for incinerator 1 and 2, respectively. Gross exceedances were also recorded in 2021. The City of Bellingham (the City) indicated that as early as 2014 the facility was not meeting Title V thresholds (2024 NWCAA Enforcement Report). Carbon monoxide is a greenhouse gas that contributes to global warming and is a hazardous gas that is harmful to human health when inhaled. Detecting high amounts of carbon monoxide also signals incomplete combustion and the likely presence of a lot of other contaminants. Carbon monoxide emissions are highly sporadic which is why a continuous monitoring system is necessary, this also makes it impossible to understand the full extent of the carbon monoxide pollution emitted from Post Point but it has likely been going on for over 10 years! ***Why has the Post Point facility been allowed to knowingly violate the carbon monoxide threshold for so long? Will there be a penalty or mitigation requirement to offset this pollution violation?***

Per Table 2 to Subpart LLLL of Part 60, carbon monoxide emission limits are supposed to be measured in parts *per million by dry volume per hour* and *not tons per year*. ***How and why was a threshold limit of 90 tons/year of carbon monoxide determined?*** Furthermore, if the City is going to properly measure the amount of carbon monoxide and other pollutants it needs to be measured before dilution occurs. A diagram provided by the City Public Works shows the continuous monitoring system placed after shaft cooling air enters into the pipe, this cooling air would dilute the sample and make calculations of actual emissions difficult and potentially inaccurate. ***The carbon monoxide monitoring system (CERMS 1 and 2) need to be placed where they will more accurately measure the actual emissions.***

We feel that a continuous monitoring system is necessary to understand the actual amount of carbon monoxide pollutant that is emitted, however, this action alone does not adequately ensure that these incinerators are preventing air pollution from being emitted to the surrounding community. Monitoring for only carbon monoxide does not meet the 60 Subpart LLLL standards as highlighted in violation #1. In addition to carbon monoxide standards, ***LLLL standards also require meeting the emission limits for: Particulate matter, hydrogen chloride, dioxins/furans, mercury, oxides of nitrogen, sulfur dioxide, cadmium, lead, and fugitive emissions from ash handling*** (Table 2 to Subpart LLLL of Part 60).

The need for this is evident; compliance testing from 2023 found that dioxins/furans emissions were 2 times higher (incinerator 1) and 5 times higher (incinerator 2) than the regulations. Dioxins and furans are persistent organic pollutants that are highly toxic to humans and the environment. It has been over a year since this compliance testing was done with no known efforts to curb the pollution. Studies show that carbon monoxide is not the only pollution problem and legally, ***all of these pollutants need to be monitored at the incinerators at Post Point.***

Need to confirm Subpart “LLLL” status:

Public records requests have confirmed that the City of Bellingham has exceeded the 50-percent threshold metric, meaning it has spent enough money on repairing the incinerators to require that the facility be regulated at the more protective Subpart LLLL standards that include new source performance standards. City employees have confirmed this status orally and in emails. ***We ask that the NWCAA officially confirm this designation and ensure that all LLLL performance standards are being met promptly.***

If the incinerators are too old to comply with the most protective LLLL air quality standards then they should not be allowed to continue to operate. Grandfathering in old, polluting technology harms people and the environment and is unnecessary because there are alternatives to incineration.

Background and Clean Air Permits (Violations #2 and #3):

The two multi-hearth incinerators at Post Point Wastewater Treatment Plant, that are in question, began burning sewage sludge in 1974 (Incinerator 1) and 1994 (Incinerator 2). Due to the age of the incinerators, the City struggles to keep them in compliance with current Clean Air Act pollution regulations. City staff claim that they need to order parts from eBay to regularly fix them (City Council Meeting). The extensive repairs and modifications made to the incinerators to keep them in compliance have put them into a more stringent threshold category making compliance even more difficult. With all of the modifications, both incinerators should now be required to meet the thresholds described in 40 CFR Subpart LLLL.

Of major concern is the fact that Post Point has a long history of not complying with air quality standards and the City has been operating without the proper permits, per Violations #2 and #3. Given the age of the incinerators, 51 and 31 years old; it will become increasingly difficult to ensure that the incinerators meet current air quality thresholds for Primary Pollutants, Hazardous Air Pollutants, and currently unregulated Contaminants of Emerging Concern especially if they do not have any permits. Furthermore, the incinerators are situated next to critical habitat and a neighborhood. ***We request that NWCAA grant Post Point WWTP the most protective air quality permits available as soon as possible.***

Contaminants of Emerging Concern emissions:

If Post Point is struggling to meet the pollutant threshold levels in the supposedly required air operating permit, then it is likely that the incinerators are not adequately treating unregulated pollutants. The Bellingham Incinerators do more than just incinerate sewage from households, they also accept waste from industrial facilities and untreated stormwater. These facilities have the potential to introduce more toxic compounds into our wastewater stream. Microplastics, PFAS, and 6PPD-Q are contaminants of emerging concern that are ubiquitous in wastewater, hard to treat, and hazardous to humans and the environment at very small amounts. Chemical testing done in 2021, detected both PFAS and microplastics in the Post Point sewage sludge. These outdated incinerators were not designed to address these newer contaminants and it will be difficult, if not impossible, for

them to break them down without extraordinary measures. ***What assurances can be made that the aging infrastructure at Post Point is not and will not emit toxic pollution from the burning of unregulated pollutants?***

Questionable Long-Term Viability of Incinerators:

Up until 2022, the City claimed that the incinerators were falling apart and that it was very difficult, if not impossible, to repair and maintain this aging infrastructure. Now, the City claims that it will keep the incinerators running for the next 20-30 years. *We do not have great confidence that the City can adequately repair and maintain these incinerators AND be protective of human health and the environment.* The history of threshold violations, the lack of an Air Operating Permit, and the simple old age of the infrastructure appear to be insurmountable challenges to meeting increasingly stringent air quality standards and community concerns.

In 2023, the EPA required the City of Lynnwood, WA to shut down its incinerators for noncompliance of emissions limits, operating limits, and stack testing requirements. This sounds similar to the situation currently at Post Point and we wonder if this is also the best scenario for Post Point. ***We feel that shutting down the incinerators at Post Point should be analyzed and be considered a viable option for ensuring that no illicit air emissions occur.***

Increasingly, RE Sources feels like the incinerators at Post Point are not adequately treating the sewage solids and are a considerable source of air pollution. We do not feel confident that a whack-a-mole, band aid approach to fixing the aging incinerators will make them compliant today, nor 20 years from now. The air permitting system has failed to protect the community from these polluters and we request that action is taken immediately to fix the situation. Requesting the City to plan for shutting the incinerators down would be a logical first step.

Sincerely,

Kirsten McDade  
North Sound Waterkeeper