



Public Works Department
City of Bellingham

Agata McIntyre, P.E.
Northwest Clean Air Agency
1600 South Second Street
Mt. Vernon, WA 98273

September 28, 2023

Dear Ms. McIntyre,

I'm writing to follow up with you on the Sept 18th meeting with NWCAA and City of Bellingham staff. At this meeting, the applicability of 40 CFR 60 subpart LLLL to the sewage sludge incinerators at Post Point was discussed. Applicability of this subpart is contingent upon an assessment of the cost of the build/install of both incinerators and the subsequent maintenance/repair costs over the life of each unit.

We have been working on an accurate accounting of the cumulative costs expended for the modifications to both incinerators, but as you know, all historical expenditures have been difficult to locate. So, with a review of our known modification projects up to this year (2023), we acknowledge that the City has likely exceeded the 50-percent threshold per the definition of *modification* in the 40 CFR 62.16045.

We appreciate the time you have spent with us working to find a path forward to meet current regulations and ultimately, to improve the air quality in our community. We look forward to continued collaboration with NWCAA as we work towards a Compliance Plan that will maximize the wise use of our resources with the goal of a cleaner environment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Johnston".

Eric Johnston, P.E.
City of Bellingham Director of Public Works

Engineering
104 W. Magnolia Street, Suite 109
Bellingham, WA 98225
Phone: (360) 778-7900
Fax: (360) 778-7901
TTY: (360) 778-8382
Email: pw@cob.org

Natural Resources
104 W. Magnolia Street, Suite 109
Bellingham, WA 98225
Phone: (360) 778-7800
Fax: (360) 778-7801
Email: pw@cob.org

Operations
2221 Pacific Street
Bellingham, WA 98229
Phone: (360) 778-7700
Fax: (360) 778-7701
Email: pw@cob.org