

# Pacific Rim

Environmental Resources, Inc.  
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(509)773-4900 Fax (509)773-4266  
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April 20, 2004

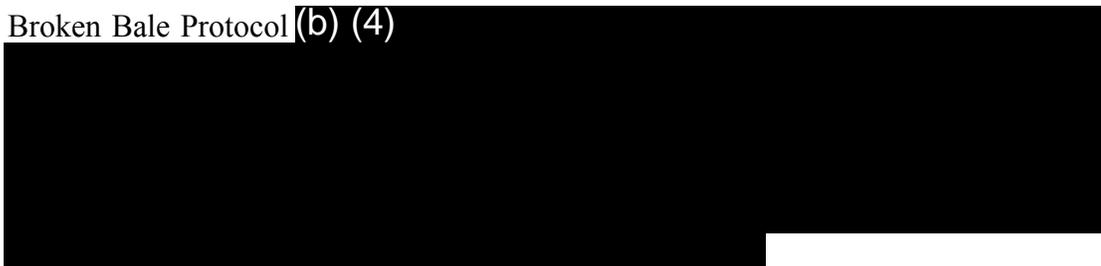
Mr. Barney P. Caton, Ph.D.  
Ecologist and Pest Risk Analyst  
Plant Epidemiology and Risk Assessment Laboratory  
Center for Plant Health Science and Technology  
Animal and Plant Health Inspection Service  
United States Department of Agriculture  
Raleigh, North Carolina  
Via Hand Delivery

**Regarding: Compliance Agreement for Honolulu Solid Waste Transportation**

Dear Mr. Caton:

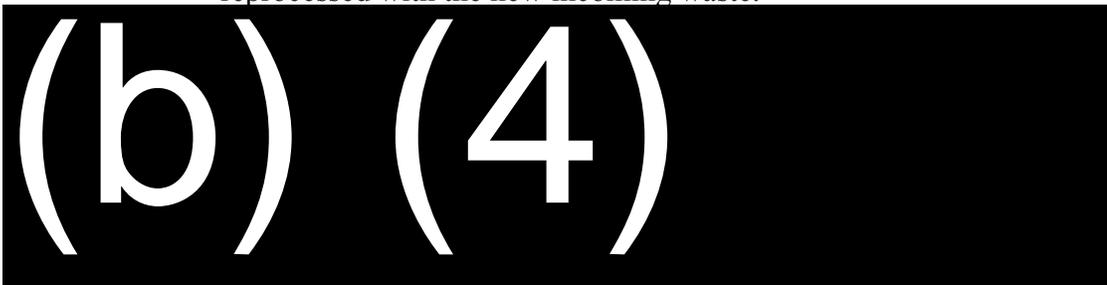
I appreciated the opportunity to meet with you on the 13<sup>th</sup> and discuss our project. Based upon our discussions, we would like to add the following protocol to our waste handling approach for waste spills.

Broken Bale Protocol (b) (4)



b. Handling of the spilled waste:

- i. If the spill occurs in Hawaii, then the spilled waste will be collected and sent back to the transfer station where it will be reprocessed with the new incoming waste.



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Within the protocol noted above, we have revised it to comply with the measures noted in the PPQ Aircraft and Maritime Operations Manual regarding waste spills in non-food areas.

After our discussion over the number of bales that have been dropped and broken open, I called the operation in Provo, Utah and spoke with their manager, (b) (6) s (b) (6) regarding their experience. He indicated that they have not had any bales be dropped and break open during their operations history over the last few years. They are making the largest wrapped bales known at about seven tons per bale. Their landfill breaks open the bales after they are delivered and buries the waste with the rest of the garbage that is being delivered. They often get complaints from the landfill that the bales are too difficult to break open. From the standpoint of our discussion, this is good news.

Also as we noted in our discussions, we are planning on generating bales weighing an estimated 10 tons each. Our existing waste contract is for 100,000 tons per year and we have the ability over three years to increase it to 350,00 tons per year. We will also be pursuing additional contracts over the coming years for additional quantities of waste in the Honolulu area.

Please find attached a proposed protocol for the handling of ash from the solid waste incinerator located in Honolulu. The expected quantity is (b) (4) per year. We look forward to receiving a draft of your analysis. Please call if there are any questions or issues that we can address. Thank you for your time and consideration.

Sincerely,

PACIFIC RIM ENVIRONMENTAL RESOURCES

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## **Hawaiian Waste Handling and Export Protocol for Honolulu Proposed by Pacific Rim Environmental Resources**

### **Introduction**

Pacific Rim Environmental Resources, LLC, (PRER) is negotiating agreements to transport ash from the solid waste incinerator that is used by the City and County of Honolulu, in the State of Hawaii to their contracted landfill in the State of Washington. This waste handling protocol has been prepared to conform to existing solid waste management regulations in the State of Washington (Including Federal Subtitle D regulations) and to provide a framework for securing USDA/APHIS approval of a compliance plan under Title 7 Agriculture, Chapter III Part 330.400 (4) page 350. Specifically we are asking for the approval of the Administrator for procedure and facilities that *“has equipment and uses procedures that are adequate to prevent the dissemination of plant pests and livestock or poultry diseases, and that it is certified by an appropriate Government official as currently complying with the applicable laws for environmental protection”*. In addition, the handling of the ash waste conforms with the existing requirement of treatment by incineration. The ash is produced by the burning of solid waste in Hawaii at the existing H-Power plant near Honolulu. After this the waste, in accordance with solid waste regulations, is buried in a dedicated landfill cell for ash only.

PRER has designed a system of waste densification, packaging and transportation that will cost effectively provide a high level of environmental security and operational efficiency as well as conform to all solid waste and environmental protection State and Federal regulations. Upon arrival of the waste in Washington, it will be buried in a dedicated landfill cell that is currently being used for the ash of other incinerators in the Northwest. This protocol describes the planned operations and the imbedded protections against the release of solid waste and/or the transport of banned insects and controlled substances.

The owners of PRER have over 30 years of experience with the transportation and land-filling of solid waste. In that time they have played integral roles in safely and successfully transporting over 20,000,000 tons of solid waste, while addressing environmental release and insect quarantine regulations in Oregon, Washington, Alaska, California and Canada. In March of 1993, the USDA issued a permit (Permit #37617), for the transport of waste soils from Hawaii. The permit was allowed to expire as it was believed that no other projects were being considered at the time. Within the existing conditional use permit for the destination landfill is a requirement for establishment and maintenance of small orchards at the inter-modal unloading facility, scale house and landfill. These small orchards are maintained with insect traps that are monitored regularly by entomologists to verify that harmful pest insects are not being imported. These findings are reported to the Klickitat County Solid Waste Director annually. To date we have not encountered a quarantined insect in the orchard traps during the past 12 years of landfill operations, in which time waste has been accepted from Washington and the importation of waste from Oregon, California, Canada, Idaho, Alaska, Antarctica and

Hawaii. PRER has clearly demonstrated their commitment and competency conforming to regulatory requirements while developing and implementing innovative solutions to address the regulations that have been established to protect the environment and agricultural interests.

### **Quarantine Pests and Noxious Plant Issues**

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Therefore, we believe that the potential for the survival of quarantine pests or noxious plants is negligible.

### **Proposed Waste Handling Protocol**

PRER's system has been designed to be compatible with existing solid waste practices and regulations that were implemented with the approval of Subtitle D in 1988, while providing added efficiencies and densities for long term disposal. Today's solid waste handling protocols in accordance with Subtitle D national standards provide the required screening that prevents the improper disposal of banned materials. This established handling protocol enables PRER to implement a system that interrupts pathways by which banned substances, insect pests and other regulated or undesirable materials could be transported to the continental Northwest.

The following is a description of the proposed waste handling and processing steps:

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b. Handling of the spilled waste:

- i. If the spill occurs in Hawaii, then the spilled waste will be collected and sent back to the transfer station where it will be reprocessed with the new incoming waste.

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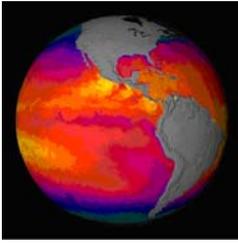
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### **Summary**

PRER has presented a system and approach that incorporates the best of existing protocols using solid waste transfer stations as a foundation and then enhances this process with the best of waste compaction, containment and isolation technologies. We have presented a premise under which the project can be approved under the existing regulations. Furthermore, the landfill PRER has proposed to use is currently approved for the disposal of cattle suspected of Mad Cow disease. The baling and wrapping processes proposed have been proven in practice as well as in agricultural industries where the penalty for failure can be millions of dollars in lost crop value. The final and important element of the proposed protocol is the manifesting process that will document bale integrity throughout the handling and transportation process. The protocol also contains

conservative provisions to repair breaches of the proposed wrapping system and document those incidents in the manifesting process. This approach will allow all those involved with the process to gain a high degree of verification and quality control for the duration of the project.



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June 17, 2004

Mr. Barney P. Caton, Ph.D.  
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Plant Epidemiology and Risk Assessment Laboratory  
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United States Department of Agriculture  
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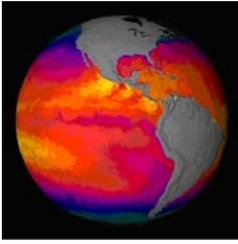
**Regarding: Risk Assessment for Honolulu Solid Waste Transportation**

Dear Mr. Caton:

We appreciated the opportunity to review your risk assessment study for our proposed project. We believe that your assessment accurately reflects our proposed intention to bale and wrap solid waste for transport from Hawaii to Washington. We look forward to completion of the compliance agreement as events in Hawaii are moving quickly toward our need to implement operations. Please call if there are any questions or issues that we can address. Thank you for your time and consideration.

Sincerely,  
PACIFIC RIM ENVIRONMENTAL RESOURCES

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August 31, 2004

Mr. Barney P. Caton, Ph.D.  
Ecologist and Pest Risk Analyst  
Plant Epidemiology and Risk Assessment Laboratory  
Center for Plant Health Science and Technology  
Animal and Plant Health Inspection Service  
United States Department of Agriculture  
Raleigh, North Carolina  
Via Hand Delivery

**Regarding: Compliance Agreement Issues for Honolulu Solid Waste Transportation**

Dear Mr. Caton:

We are writing to further discuss two issues that have arisen during the development of the compliance agreements that are based upon your risk assessment for our proposed project. The first is the issue of using the RPP Round Baling and wrapping technology. After making our proposal involving that technology we found that we could not reach a commercially viable solution with RPP. Furthermore, we learned that they have had a substantial amount of reliability issues with their equipment in Utah. Based on that we went back to Europe to see what other technologies are available. With this research we learned of several technologies that wrap square bales. In particular we visited three facilities using the Crosswrap technology. Attached is a copy of their letter guaranteeing their process and an ability to provide the level of protection that we need. In addition, we found that the clamping and lifting equipment is much better developed for the square bales thereby reducing the potential of tearing the bales during handling. It is with this in mind that we would like you to consider the following protocol for use in a compliance agreement.

1. All waste shall be shredded prior to baling.
2. All waste shall be baled and contained in a high density bale that is structurally sound enough to be lifted without wrapping and still maintain integrity.
3. All waste bales shall be wrapped to provide a minimum of four layers of low density film sufficient to provide an air tight enclosure.

The second issue started out as a miss understanding but requires further clarification to achieve an operationally feasible solution given pending changes in the oceanic barge fleet. This started with our original commitment to make sure the waste was buried in the

Mr. Barney P. Caton, Ph.D.

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landfill within 24 hours of delivery to the landfill. This turned into a statement in the risk assessment that indicated that the waste would be buried within 24 hours of arrival in Roosevelt. It remains fully our intention and capability to bury the waste within 24 hours of arrival at the landfill however; it is not feasible to transport all of the waste from the dock in Roosevelt to the landfill within 24 hours of arrival of the barge nor is it financially possible to leave the ocean barge in Roosevelt for a week of unloading. Also, since the risk assessment was completed our barging company has decided to retrofit their fleet during the next five years and start to use 100' wide barges. These barges will be too wide to travel through the locks on the Columbia River to reach Roosevelt. Based on this we would like to propose a barge to barge transfer, first in Roosevelt and later in Longview. This type of transfer is consistent with the expected handling protocol where the lift trucks on the barge take the bales of waste to the edge of the barge and set them on either the dock or in the case of Roosevelt, the moored receiving barge. This barge is moored with "spuds" which are columnar pilings to anchor the barge in place. We propose to stage the bales of waste on the docking barge in Roosevelt for delivery to the landfill. Later after it is necessary due to barge equipment issues we would move to a barge to barge transfer in Longview. Under this scenario we would be able to leave the river barge in Roosevelt for a week of unloading and avoid the step of staging on the river docking barge. The point we understand that is most important to APHIS is to avoid the "grounding" or staging of the bales on Washington soil or pavement. Based on this we would avoid grounding the bales in all operational scenarios prior to reaching the landfill working face. Whether it is in Longview or in Roosevelt, all barge to barge transfers would prohibit "grounding" of the bales. We would only allow vessel to vessel transfers.

In Roosevelt the bales will be taken off the docking barge and transferred to the landfill prior to the arrival of the next barge. All loading and unloading will be observed by a Pacific Rim Environmental Resources supervisor in either Longview or Roosevelt. This supervisor will be responsible for bale integrity inspections and repairs. There will be a wrapping machine available at all transfer points and all repairs will be noted on the appropriate tracking manifest. Attached are photos of the wrapping of square bales plus we have included a small video on compact disk that show the process. We visited facilities in Austria, Spain and the Netherlands where we were able observe this technology first hand. We believe that this equipment will provide the reliability that we know is expected of our project. Please call if there are any questions or issues that we can address. Thank you for your time and consideration.

Sincerely,

PACIFIC RIM ENVIRONMENTAL RESOURCES

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Engineering Director

