



# Portland North Harbor Air Quality

Update – Feb. 6, 2017

## What is the issue?

Beginning in late August 2015, DEQ and its partner agencies began investigating odors in the Portland North Harbor area in response to numerous citizen complaints. Based on these investigations, DEQ identified two used oil re-refineries, American Petroleum Environmental Services (APES) and Oil Re-refining Company (ORRCO), as sources contributing to the odors. The recycling process begins with the used oil heated to a high temperature to remove water and impurities. After the heating process, the oil is further refined to remove additional pollutants and sold as a fuel product.

Air quality permits for APES and ORRCO require updates that will include additional testing, monitoring, and recordkeeping requirements.

In response to community concerns, EPA, in support of DEQ's investigation into odors, conducted air monitoring at two locations near the oil re-refiners from September 2015 to January 2016. While the pollution levels measured did not pose an imminent health risk and were generally consistent with levels found in an urban environment, several days over the two months showed intermittent elevated levels of specific odorous gases.



EPA air quality monitoring sites

DEQ conducted follow-up monitoring around the North Portland harbor area in an effort to better understand the specific pollutants of concern identified by EPA. Results from DEQ monitors showed levels of air pollutants similar to those found in urban air and do not pose an imminent health risk. However, people with asthma or other respiratory conditions may experience increased frequency of symptoms.



**DEQ Air quality monitoring sites**

### **What are DEQ and other agencies doing about it?**

DEQ and partner agencies are working quickly to develop enforceable requirements for APES and ORRCO to reduce odors and emissions. Since late 2015 DEQ and other regulatory agencies have been:

1. Investigating permitted sources
  - Conducting announced and unannounced inspections and offering technical assistance to APES and ORRCO, as well as performing offsite investigations.
  - Performing monitoring at locations near APES and ORRCO.
    - EPA's emergency response section assisted DEQ in investigating the odors and air emissions by conducting limited short-term screening in the area from September 2015 through January 2016.
    - DEQ conducted additional sampling and monitoring near APES and ORRCO to identify the pollutants of concern and associated meteorological conditions during odor events.
  - Collecting information from APES and ORRCO: In April and May of 2016, EPA and DEQ issued joint 114 information request letters to APES (April 114 letter: May 114 letter) and ORRCO (April 114 letter: May 114 letter) requiring them to sample received product and monitor facility operations. DEQ/EPA required APES and ORRCO to submit sampling and monitoring records to DEQ/EPA twice monthly. DEQ staff is reviewing the submitted 114 information request records to determine the compliance status of the facilities.
  - Ongoing evaluation about whether the facilities are complying with existing air quality permits.
2. Determining additional environmental permits that apply:
  - DEQ's Solid Waste Program asked ORRCO to revise its solid waste permit application and asked APES to apply for a solid waste permit.

### 3. Working with APES and ORRCO to find solutions

- Negotiated a voluntary agreement with APES that requires installation of control technology at the facility: In December 2016, DEQ entered into a Mutual Agreement and Final Order with APES that includes an enforceable timeline for completing the work.
- Explained requirements to ORRCO about the need for solid waste permits in order to operate its existing kiln and evaporator, and future applicable air quality regulations that would impact ORRCO's operations. DEQ received a letter from ORRCO on May 12, 2016 stating that ORRCO discontinued use of the kiln. On July 22, 2016, DEQ provided data to ORRCO on the use of the evaporator and requested that ORRCO stop using the evaporator. DEQ received a letter from ORRCO dated Aug. 18, 2016 stating that ORRCO discontinued use of the evaporator. DEQ confirmed through unannounced inspections that the kiln and evaporator were not operating.
- Working with EPA and APES to have the contents of Tank 12 disposed of properly. Tank 12 contains PCB contaminated oil that EPA regulates under the Toxics Substance Control Act. There is no environmental or health risk from the PCB contaminated oil that is in Tank 12.

### 4. Reviewing and planning to update permits

- DEQ will update and renew APES and ORRCO's Air Contaminant Discharge Permits. The updated permits will include additional emission controls, increased monitoring parameters, and additional record keeping requirements.
- ORRCO submitted a Notice of Intent to Construct (NOC) application in September 2016, to install new emission controls and modify existing equipment. DEQ requested additional information from ORRCO on their plan to modify the facility, which will be submitted, to DEQ in early 2017.
- APES submitted a complex technical modification application for an updated permit in 2017. DEQ is reviewing APES application submittal for compliance measures according to the Typically Achievable Control Technology (TACT) analysis conducted in 2016.
- ORRCO submitted an updated solid waste permit application for solid waste activities at their facility including used oil filter crushing, sludge solidification and accumulation and transfer of oily solids.
- Requested APES submit an application for solid waste transfer and material recovery at their facility including used oil filter crushing and accumulation and transfer of oily solids.

### 5. Engaging the public

- DEQ understands the frustrations of the residents in the Portland North Harbor area and attempts to keep the public informed by attending neighborhood meetings, hosting public forums, and performing other outreach activities.

### **What's going to happen next?**

- The MAO requires APES to install and operate new control technology by July 25, 2017. DEQ determined that the air pollution control technology proposed by APES (natural gas thermal oxidizer) would appropriately control emissions and reduce air pollution and odors.

- DEQ will modify APES and ORRCO's air quality permits to reflect current state and federal rule. DEQ will renew both air quality permits in 2017.
- DEQ will continue working with EPA and APES to insure the contents of Tank 12 are properly disposed of.
- DEQ is evaluating the ORRCO's solid waste permit application for completeness and has asked APES to submit a solid waste permit application.

### **What are opportunities for public input?**

- Sign up for email updates
- DEQ will host informational meetings with the public prior to renewing APES and ORRCO's air quality permits and drafting solid waste permits. DEQ will post a public notice announcement with meeting specifics once each permit application is reviewed and determined complete.
- Provide public comment during permit renewal process: If a permit requires a major modification or if DEQ proposes to issue a new or renewal permit, the agency will post the proposed permit or permit changes on the DEQ public notice web page for public review and comment.
- To file an air quality complaint through DEQ's website, complete the online form, including all relevant information and specific information, such as Time, Date, Temperature, Wind Speed, Direction, Description of the Incident, etc. You may also file a complaint with DEQ by calling the DEQ Hotline at 1-888-997-7888. Interpreter services are available.
- Agency Main Content

More information

### **More information**

- [Frequently asked questions about Portland North Harbor Air Quality Investigation](#) (May 2016) [Questions about onsite sampling](#) (May 2016)
- Learn more about [air quality permitting in Oregon](#).

Facility correspondence with DEQ and reporting by APES and ORRCO:

- [American Petroleum Environmental Services, Inc.](#)
- [Oil Re-refining Company](#)

### **Questions?**

Please direct air quality related questions regarding APES and ORRCO to:

Dave Kauth, P.E., environmental engineer: [kauth.dave@deq.state.or.us](mailto:kauth.dave@deq.state.or.us), 503-229-5053; or Louis Bivins, air quality permit engineer: [bivins.louis@deq.state.or.us](mailto:bivins.louis@deq.state.or.us), 503-229-6333.

Please direct hazardous and solid waste questions regarding APES and ORRCO to:

Laurey Cook, hazardous waste inspector: [laurey.cook@state.or.us](mailto:laurey.cook@state.or.us), 503-229-5015; or Heather Kuoppamaki, P.E., solid waste engineer: [Kuoppamaki.Heather@deq.state.or.us](mailto:Kuoppamaki.Heather@deq.state.or.us)