



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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September 26, 2016

RE: Notice to Community of APES Maintenance Shutdown, September 27-29

Dear Jantzen Beach residents,

On September 20, 2016, as required by the DEQ and EPA joint 114 letter, American Petroleum Environmental Services, Inc. (APES) notified DEQ and EPA the plant would undergo regularly scheduled shutdown and maintenance from September 27 to September 29. APES will begin shutting down the re-refinery on the 27th at 1:00 am to begin the cool-down process. The maintenance activities are scheduled to begin at 4:00 am on the 27th. Following the completion of the maintenance activities, APES will initiate the plant start up process on the 29th at 12:30 am. Maintenance will consist of a variety of measures to ensure proper operation and function of the plant. The maintenance will include, but is not limited to the following: Pressure washing and cleaning of the wiped film evaporator, cleaning the firebox on the back plant burner, replenishing the exhausted carbon filtration drums, and cleaning and replacing filters as needed.

During previous APES maintenance shutdowns, DEQ and EPA have received increased odor and air quality complaints from citizens living and working in Jantzen Beach and Hayden Island. DEQ staff will be present onsite during the APES shutdown procedure to determine if the facility shutdown and maintenance activities correlate with any increase in odor and air quality complaints from citizens. DEQ will ensure APES takes the necessary precautions to minimize emissions and odors while maintenance is performed. DEQ will document the shutdown and cleaning procedures and identify any areas of non-compliance. We also ask that you continue documenting and reporting odors through DEQ's complaint system, <http://www.deq.state.or.us/complaints/rep.htm>, during, during the maintenance shutdown event, which provides useful information when tracking odors and emissions.

DEQ continues to work with APES to install emission control technology at the facility to capture and destroy 97% of Volatile Organic Compound (VOC) emissions. DEQ reviewed and approved the emission control plan submitted by APES on September 1, 2016. APES has until October 1, 2016 to submit to DEQ a compliance schedule outlining the modifications to the front and back plant burners and the installation of two new natural gas thermal oxidizers. With the modifications APES has proposed, the emissions from the cook tanks, front plant burner, back plant burner, and Pesco recycling unit will be routed to the two new natural gas thermal oxidizers for VOC destruction.

Sincerely,

Louis Bivins

Permit Engineer, NWR