



Oregon

Kate Brown, Governor

Department of Environmental Quality

Office of Compliance and Enforcement

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August 29, 2017

Jeff Thompson
AmeriTies West, LLC
PO Box 1608
The Dalles, OR 97058

Re: Amendment 3 to Table 1 of MAO
No. AQ/AC-ER-16-067

Dear Mr. Thompson:

Per our discussion and your approval via email dated August 23, 2017, DEQ has updated Table 1 of Mutual Agreement and Order No. AQ/AC-ER-16-067 (MAO) to incorporate the implementation date and reporting requirement for Phase 2 of the scrubber control efficiency evaluation at AmeriTies.

By this letter, DEQ hereby amends Table 1 (attached) as Amendment 3, in accordance with Paragraphs 8.A(7) and 10 of the MAO.

Sincerely,

Sarah G. Wheeler, Acting Manager
Office of Compliance and Enforcement

Attachment

cc: Frank Messina, Mark Bailey, Eastern Region, Bend office, DEQ
Tom Wood, Stoel Rives
760 SW Ninth Ave, Suite 3000, Portland, OR 97205



Table 1: AmeriTies West Odor Action Plan

Amendment 3

8/29/17

Strategy ID	Potential Odor Source or Operation	Odor Reduction Action	Planned Completion Date
A.1	Railroad tie yard	Modify material stacking procedures to reduce exposed surface area.	Completed 10/31/2015 and continually being evaluated for improvement.
B.1	Retort vacuum operation on ties	B.1.i. Stagger retort operation.	Started 1/1/2014, currently in use and is a continuing action.
		B.1.ii. post treatment cycle cylinder purge.	Started 1/1/2015, currently in use and is a continuing action.
C.1	Process exhaust scrubber evaluation	C.1.i. Formulate an evaluation plan for the existing process air scrubber (oil).	Submitted to DEQ 9/25/2015. DEQ approved Phase 1 of the evaluation plan on September 2, 2016.
		C.1.ii. Implement DEQ-approved evaluation plan for existing air scrubber (oil) control efficiency.	Implement phase 1 of evaluation plan within 90 days of DEQ approval. AmeriTies began implementation of Phase 1 on September 7, 2016.
		C.1.iii. Submit report upon completion of Phase 1 of the scrubber evaluation. Include list of identified future action items for scrubber.	Submit report to DEQ within 45 days of completion of Phase 1.
		C.1.iv. Submit report upon completion of Phase 2 of the scrubber evaluation. Include list of identified future action items for scrubber.	Begin Phase 2 evaluation by no later than September 11, 2017. Submit report to DEQ that includes future action items within 45 days of completion of Phase 2.
D.1	Drip pad treated material air release	D.1.i. Stagger retort operation.	Started 1/1/2014, currently in use and is a continuing action.
E.1	Hot-treat preservative solution options	E.1.i. Explore options for changing preservative formulation to reduce odors.	Currently in discussion with suppliers and customers-- Status updates to DEQ on 6/1/2016.
		E.1.ii. Implement use of low-naphthalene preservative formula.	No later than November 30, 2016.
		E.1.iii Implement use of Copper Naphthenate preservative system.	Started 11/15/2015, currently in use and is a continuing action.
F.1	Tank car unloading operation for hot-treat solution	Control and/or reduce emissions from tank unloading operation.	Started 12/31/15, currently in use and is a continuing action.

Agreement Notes:

N.1) Amerities will submit a written request to DEQ before any element of the Odor Action Plan is discontinued. It is understood approval will be evaluated by DEQ on a case by case basis.

N.2) Amerities will submit a written request to DEQ prior to missing a planned action date. It is understood that date extensions will be evaluated by DEQ on a case by case basis.



Oregon

Kate Brown, Governor

Department of Environmental Quality

Headquarters
811 SW 6th Ave
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October 14, 2016

Jeff Thompson
AmeriTies West, LLC
PO Box 1608
The Dalles, OR 97058

Re: Amendment 2 to Table 1 of MAO
No. AQ/AC-ER-16-067

Dear Mr. Thompson:

Per our discussion and your approval via email dated October 12, 2016, DEQ has updated Table 1 of Mutual Agreement and Order No. AQ/AC-ER-16-067 (MAO) to reflect the status and report requirement regarding the scrubber control efficiency evaluation currently underway at AmeriTies.

By this letter, DEQ hereby amends Table 1 (attached) as Amendment 2, in accordance with Paragraph 8.A(7) and 10 of the MAO.

Sincerely,



Sarah G. Wheeler, Acting Manager
Office of Compliance and Enforcement

Attachment

cc: Frank Messina, Mark Bailey, Eastern Region, Bend office, DEQ
Tom Wood, Stoel Rives
760 SW Ninth Ave, Suite 3000, Portland, OR 97205



Table 1: AmeriTies Vast Odor Action Plan

Strategy ID	Potential Odor Source or Operation	Odor Reduction Action	Planned Completion Date
A.1	Railroad tie yard	Modify material stacking procedures to reduce exposed surface area	Completed 10/31/2015 and continually being evaluated for improvement.
B.1	Retort vacuum operation on ties	B.1.i. Stagger retort operation	Started 1/1/2014, currently in use and is a continuing action.
		B.1.ii. post treatment cycle cylinder purge	Started 1/1/2015, currently in use and is a continuing action.
C.1	Process exhaust scrubber evaluation	C.1.i. Formulate an evaluation plan for the existing process air scrubber (oil)	Submitted to DEQ 9/25/2015. DEQ approved Phase 1 of the evaluation plan on September 2, 2016.
		C.1.ii. Implement DEQ-approved evaluation plan for existing air scrubber (oil) control efficiency	Implement phase 1 of evaluation plan within 90 days of DEQ approval. AmeriTies began implementation of Phase 1 on September 7, 2016.
		C.1.iii. Submit report upon completion of Phase 1 of the scrubber evaluation. Include list of identified future action items for scrubber	Submit report to DEQ within 45 days of completion of Phase 1.
D.1	Drip pad treated material air release	D.1.i. Stagger retort operation	Started 1/1/2014, currently in use and is a continuing action.
E.1	Hot-treat preservative solution options	E.1.i. Explore options for changing preservative formulation to reduce odors	Currently in discussion with suppliers and customers-- Status updates to DEQ on 6/1/2016.
		E.1.ii. Implement use of low-naphthalene preservative formula	No later than November 30, 2016.
		E.1.iii Implement use of Copper Naphthenate preservative system	Started 11/15/2015, currently in use and is a continuing action.
F.1	Tank car unloading operation for hot-treat solution	Control and/or reduce emissions from tank unloading operation	Started 12/31/15, currently in use and is a continuing action.

Agreement Notes:

N.1) Amerities will submit a written request to DEQ before any element of the Odor Action Plan is discontinued. It is understood approval will be evaluated by DEQ on a case by case basis.

N.2) Amerities will submit a written request to DEQ prior to missing a planned action date. It is understood that date extensions will be evaluated by DEQ on a case by case basis.



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Kate Brown, Governor

Department of Environmental Quality

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August 1, 2016

Jeff Thompson
AmeriTies West, LLC
PO Box 1608
The Dalles, OR 97058

Re: Amendment to Table 1 of MAO
No. AQ/AC-ER-16-067

Dear Mr. Thompson

DEQ has received and reviewed your letter dated July 15, 2016, agreeing to amend Table 1 of Mutual Agreement and Order No. AQ/AC-ER-16-067 (MAO) to incorporate a compliance date of November 30, 2016, for conversion to the new low-naphthalene preservative formula at the AmeriTies facility.

By this letter, DEQ approves your proposal and hereby amends Table 1 (attached) in accordance with Paragraphs 8.A(7) of the MAO.

Sincerely,

Leah K. Feldon, Manager
Office of Compliance and Enforcement

Attachment

cc: Frank Messina, Mark Bailey, Eastern Region, Bend office, DEQ
Tom Wood, Stoel Rives
760 SW Ninth Ave, Suite 3000, Portland, OR 97205



Table 1: AmeriTies West Odor Action Plan

Strategy ID	Potential Odor Source or Operation	Odor Reduction Action	Planned Completion Date
A.1	Railroad tie yard	Modify material stacking procedures to reduce exposed surface area	Completed 10/31/2015 and continually being evaluated for improvement.
B.1	Retort vacuum operation on ties	B.1.i. Stagger retort operation	Started 1/1/2014, currently in use and is a continuing action.
		B.1.ii. post treatment cycle cylinder purge	Started 1/1/2015, currently in use and is a continuing action.
C.1	Process exhaust scrubber evaluation	C.1.i. Formulate an evaluation plan for the existing process air scrubber (oil)	Submitted to DEQ 9/25/2015. DEQ is evaluating the plan.
		C.1.ii. Complete evaluation of existing air scrubber (oil) control efficiency and submit action plan	Upon approval of the evaluation plan - implement within 90 days of DEQ approval .
D.1	Drip pad treated material air release	D.1.i. Stagger retort operation	Started 1/1/2014, currently in use and is a continuing action.
E.1	Hot-treat preservative solution options	E.1.i. Explore options for changing preservative formulation to reduce odors	Currently in discussion with suppliers and customers-- Status updates to DEQ on 6/1/2016.
		E.1.ii. Implement use of low-naphthalene preservative formula	No later than November 30, 2016.
		E.1.iii Implement use of Copper Naphthenate preservative system	Started 11/15/2015, currently in use and is a continuing action.
F.1	Tank car unloading operation for hot-treat solution	Control and/or reduce emissions from tank unloading operation	Started 12/31/15, currently in use and is a continuing action.

Agreement Notes:

N.1) Amerities will submit a written request to DEQ before any element of the Odor Action Plan is discontinued. It is understood approval will be evaluated on a case by case basis.

N.2) Amerities will submit a written request to DEQ prior to missing a planned action date. It is understood that date extensions will be evaluated on a case by case basis.