



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Eastern Region Bend Office  
475 NE Bellevue Drive, Suite 110  
Bend, OR 97701  
(541) 388-6146  
FAX (541) 388-8283  
TTY 711

CERTIFIED MAIL NO.: 7015 1520 0001 7834 9489

June 3 , 2020

AmeriTies West, LLC  
Lance Bliss, Plant Manager  
100 Tie Road  
The Dalles, Oregon 97058

Re: Order Approving NC #32430  
Source Number 33-0003  
Wasco County

Attention: Lance Bliss

DEQ has taken action on your Type 2 Notice of Intent to Construct approval request.

Project Location	Project Description	Plans and Specifications Identification
AmeriTies West Standard ACDP 33-0003	Construction of an emissions control system [Rotary Regenerative Thermal Oxidizer (RTO)] to be used on emissions of the retort door opening operations	NC #32430

### PLANS AND SPECIFICATIONS AND CONSTRUCTION APPROVAL

Pursuant to ORS 468A.055(3), this is an order **approving** the proposed construction in NC #32430. The approved construction must comply with the plans, specifications and any corrections or revisions thereto, submitted to obtain this approval.

In accordance with OAR 340-210-0250(2), operation of the source or approved changes to the source, as submitted in the application and approved by this order, must comply with the following conditions, including the general conditions included below:

1. The natural gas usage on the RTO must be included in the monthly calculations to demonstrate compliance with the facility's PSEL. AmeriTies must utilize the natural gas combustion emission factors in the current permit to accomplish these PSEL calculations.

2. Unless DEQ agrees to an alternative date, AmeriTies must submit to DEQ for approval, a detailed Standard Operating Procedure (SOP). The SOP must incorporate the RTO and retort door operations. AmeriTies must submit the SOP to DEQ at least 30 days prior to beginning operation of the RTO. Once approved, AmeriTies must comply with the SOP. Unless notified by DEQ of an alternative date, AmeriTies must submit a revised SOP no later than six months after start-up of the RTO. The SOP must address these minimum operating and documentation requirements:
  - AmeriTies must conduct start-up and shutdown procedures in a manner that minimizes emissions to the greatest extent possible. SOP should explain in detail how emissions are to be minimized during start-up and shutdown of the RTO.
  - Identifying optimal treated wood charge conditions before removing treated wood to the drip pad;
  - Identifying procedures for retort door openings before, during and after removal of treated wood charges;
  - Identifying procedures for Mega Pack door opening before, during, and after removal of treated wood charges;
  - The SOP must address documenting wood charge conditions (visible dripping and off gassing) on the drip pad, and include the length of time retort door was opened before wood charge is placed on drip pad.
  - Include procedures for monitoring and documenting pressure within Mega Pack containment building during RTO operation.
  - Include monitoring and documenting procedures for operating temperature of RTO. AmeriTies must keep records on-site and available for review.
  - The SOP must address corrective actions and practices if the RTO malfunctions.
  - The SOP must incorporate how the facility intends to operate the RTO and retorts during periods of natural gas curtailment
3. AmeriTies must maintain a continuous temperature monitoring system on the RTO operation. AmeriTies must ensure the RTO is operating at a minimum 1,500 degrees F while controlling emissions from the retort door openings. AmeriTies must operate the RTO with a minimum residence time of 0.5 seconds for controlling the emissions.
4. AmeriTies must ensure the RTO is up to the minimum operating temperature (identified in paragraph 3 above) when the retort doors are first opened post treatment and for a defined period of time thereafter, as established in the SOP. The SOP identifies the monitoring and recordkeeping requirements.
5. AmeriTies must operate and maintain air pollution control devices and emission reduction processes at the highest reasonable efficiency and effectiveness to minimize emissions. Air pollution control devices, including the RTO and components, must be in operation and functioning properly at all times when the associated emission source is operating. [OAR 340-226-0120]

6. Unless DEQ agrees to an alternative date, AmeriTies must conduct a source test on the completed emissions control system including the RTO operations within three months of start-up. Testing must be conducted while controlling retort door opening emissions and must include the following:
  - A capture efficiency demonstration of the control system:
  - Sampling for specified criteria pollutants
  - Sampling for air toxics required to complete the Cleaner Air Oregon emission inventory and analysis.AmeriTies must submit the associated source test plan 45 days prior to conducting the test. If DEQ agrees to an alternative test date, AmeriTies must test no later than the agreed-upon alternative date.
7. AmeriTies must notify DEQ in writing of the date the facility starts the RTO emissions control system. The notification must be submitted no later than seven (7) days after startup.
8. AmeriTies must operate the RTO only using natural gas.
9. AmeriTies must ensure it has land-use approval for the new RTO emissions control system before beginning operation of the RTO.
10. AmeriTies must submit a (proposed) update to the Mutual Agreement and Order Odor Action Plan (Table 1) to DEQ for approval identifying additional steps AmeriTies will take to reduce odor emissions at the facility. This update must include construction and operation of the RTO and Mega Pack building. In addition, it must include an evaluation for potentially routing retort process emissions to the RTO. AmeriTies must submit the proposed changes to DEQ by July 9, 2020.

In accordance with OAR 340-210-0240(3), AmeriTies must notify DEQ of completion and startup within 30 days after completing the construction or modification. Please complete the enclosed Notice of Approved Construction Completion form and return it to:

Eastern Region Bend Office  
Attn: Permit Coordinator  
475 NE Bellevue Drive, Suite 110  
Bend, OR 97701

Pursuant to ORS 468A.055(5), you have a right to request a contested case hearing on this order **within 20 calendar days** from the date this order was mailed. The contested case hearing must be requested, and will be conducted, in accordance with ORS Chapter 183, OAR Chapter 137, division 003 and OAR Chapter 340, division 011.<sup>1</sup> You must send your written request to: Office of Director, DEQ, 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232. If you fail to file a timely request for hearing, this order will become a final order by default without further action by DEQ, as per OAR 340-011-0535(1).

If you have questions, please contact the permit writer, Frank Messina, at (541) 633-2019.

Sincerely,



Mark W. Bailey *For*  
DEQ Eastern Region AQ Manager

Enclosure: Notice of Approved Construction Completion form

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<sup>1</sup> Active duty service members have a right to stay proceedings under the federal Service Members Civil Relief Act. For more information, contact the Oregon State Bar at 1-800-452-8260, the Oregon Military Department at 503-584-3571, or the nearest United States Armed Forces Legal Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military Department does not have a toll free telephone number.