



State of Oregon
Department of
Environmental
Quality

STANDARD AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

Department of Environmental Quality
Eastern Region

Source Information:

SIC	2491,4961
NAICS	221330, 321114

Source Categories (Table 1 Part, code)	Part B,13, 83 and 84
Public Notice Category	III

Compliance and Emissions Monitoring Requirements:

FCE	
Compliance schedule	
Unassigned emissions	
Emission credits	
Special Conditions	X

Source test [date(s)]	
COMS	
CEMS	
PEMS	
Ambient monitoring	

Reporting Requirements

Annual report (due date)	Feb. 15
NSPS report (due dates)	Jan 30, July 30

Monthly report (due dates)	
Excess emissions report	X
Other (specify)	

Air Programs

Synthetic Minor (SM)	
SM -80	
NSPS (list subparts)	Dc
NESHAP (list subparts)	
Part 68 Risk Management	
CFC	

NSR	
PSD	
RACT	
TACT	
Other (specify)	

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PERMITTING

PERMITTEE IDENTIFICATION

1. Amerities West LLC operates a wood preserving facility located at 100 Tie Plant Road in The Dalles, Oregon.

PERMITTING ACTION

2. The proposed permit is a renewal of an existing Air Contaminant Discharge Permit that was issued on May 19, 2008 and was originally scheduled to expire on April 1, 2013. The existing ACDP remains in effect until the proposed permit is issued because the permittee submitted a timely and complete application for renewal. A basic technical modification was issued on June 6, 2011.
3. By authority of OAR 340-216-0064(1)(c)(A), the Department converted the permit from a Simple ACDP to a Standard ACDP during the previous permit action because of odor issues related to the plant operations.

OTHER PERMITS

4. No other permits have been issued or are required by the Department of Environmental Quality for this source. However, a National Pollutant Discharge Elimination System Storm Water Discharge permit will be required if storm water outfalls develop or are discovered.

ATTAINMENT STATUS

5. The source is located in an attainment area for all pollutants.
6. The source is not located within 10 kilometers of any Class I Air Quality Protection Areas. The source is located in the Columbia River Gorge National Scenic Area but the source is not a significant source of visibility impairing pollutants.

SOURCE DESCRIPTION

OVERVIEW

7. Amerities West LLC operates a wood preserving facility located on Tie Plant Road in The Dalles, Oregon. The process includes two boilers, three cyclones, and five retorts (wood treating cylinders). The facility was purchased from Kerr-McGee Chemical, LLC in 2005.

8. The following changes have been made to the permit to identify and address odor issues:
- a. The permittee is required to submit a wood preservative evaluation report.
 - b. The permittee is going to evaluate potential sources of odors under the odor reduction measures.
 - c. The permittee is required to conduct an oil scrubber performance study.
 - d. The permittee is required to conduct an emission factor review to verify emission factors used in the permit.

PROCESS AND CONTROL DEVICES

9. Existing air contaminant sources at the facility consist of the following:
- a. One Erie City single pass water tube boiler with a maximum capacity of 29.4 million Btu/hr heat input, installed in 1949. A John Zink burner was installed in the boiler sometime during the 50's or 60's. The boiler uses natural gas as the primary fuel and #2 distillate oil as backup.
 - b. One Cleaver Brooks single pass water tube boiler with a maximum capacity of 33.5 million Btu/hr heat input installed in 1999. Since this is a new boiler, it is subject to Federal New Source Performance Standards (40 CFR Part 60, Subpart Dc). The primary fuel is natural gas, but #2 distillate oil may be burned when natural gas is not available. Only one boiler is typically operated at a time, except during startups and shutdowns.
 - c. Three cyclones:
 - i. #1 ABI Mill Cyclone – medium efficiency cyclone, processing sawdust, installed in 2001.
 - ii. #2 Planer Mill Cyclone (framing yard) - a medium efficiency cyclone installed in 1992, processing planer shavings.
 - iii. #3 Framing Mill Cyclone (framing relay) - a medium efficiency cyclone installed in 1992, processing sawdust.
 - d. Five wood treating retorts, which are large, heated, horizontal cylindrical vessels that can be evacuated and pressurized with either creosote coal tar or a creosote/petroleum mixture in the wood preservation process. Pollutant emissions come from the doors when they are opened to load and unload charges and from operation of the vacuum system. The emissions from the retort doors are uncontrolled. The emissions from the vacuum system are controlled by the following:
 - i. A ventilation air tank/knock-out with rated efficiency of 50%;
 - ii. Spray with rated efficiency of 75%;
 - iii. Covers with rated efficiency of 80%; and
 - iv. Vapor balancing line with rated efficiency of 50%.These controls are in series, so the combined removal efficiency is 98.75%. This system is also used to control emissions from the working and storage tanks.

- e. Working and storage tanks: Emissions are controlled using the system described above.
- f. A totally enclosed Wastewater Treatment System discharging to a Publicly Owned Treatment Works, consisting of two initial oil/water separators, a secondary separator, a biological treatment unit, a finishing tank, and an emission control device consisting of a simple water spray, vapor equilibration system, and covers. The combined control efficiency is 95%.
- g. Fugitive VOCs from the storage yard, drip pad, sumps, and process sources such as pump seals, flanges and valves. Fugitive particulate matter may also originate from wood waste handling operations and onsite vehicular traffic. The sumps have covers, which reduce emissions by 90%.

COMPLIANCE

- 10. The facility was inspected on December 18, 2012 and found to be in compliance with permit conditions.
- 11. During the prior permit period there were the following complaints:

Year	Number of Odor Complaints
2014	42 as of (11/20/2014)
2013	11
2012	4
2011	33

The existing permit was issued on May 19, 2008.

- 12. Since the last permit renewal the facility directly received 11 odor complaints that were investigated, documented and addressed in the annual reports. On January 1, 2014 DEQ developed the Nuisance Odor Strategy for responding to odor complaints: <http://www.oregon.gov/deq/Pages/Nuisance-Strategy.aspx>
As of November 20, 2014, for the year of 2014 DEQ received 43 complaints but not all complainants submitted an Odor Complaint Intake Form. Completed Odor Complaint Intake Forms are necessary to trigger the DEQ Nuisance Strategy procedure.
- 13. No enforcement actions have been taken against this source since the last permit renewal.

SPECIAL CONDITIONS

- 14. The permittee is required to keep a record of complaints and notify the Department within 5 working days. The notification must include the date of contact, time of claimed nuisance condition, description of claimed nuisance condition, location of receptor, and status of plant operation during the observed period.

15. The permittee is required to conduct a wood preservative evaluation report and submit the report.
16. The permittee is required to evaluate potential sources of odors as part of the odor reduction measures.
17. The permittee is required to evaluate the equipment efficiency through a test/study on the oil scrubber unit used as a control device at the facility.
18. The permittee is required to evaluate the current emission factors used in the permit. This review will entail studies and/or tests to evaluate the emission factors.

EMISSIONS

19. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
PM	1	0	0	24	24	0
PM ₁₀	1	0	0	14	14	0
PM _{2.5}	-	0	0	-	9	9
SO ₂	6.1	0	0	39	39	0
NO _x	10.5	0	0	39	39	0
CO	2.3	0	0	99	99	0
VOC	122	0	0	39	39	0
GHG (CO ₂ e)	12,900	0	0	-	74,000	74,000

- a. The baseline emissions are actual emissions from the facility during the baseline period. A baseline emission rate will not be established for PM_{2.5}. (OAR 340-200-0020(13)) The baseline period is any consecutive 12-month period during 1977 or 1978 for all pollutants except GHG. For GHG the baseline period is any consecutive 12-month period during 2000-2010.
- b. Although the source operated in the baseline period, the netting basis was reset to zero in accordance with OAR 340-222-0040(2) when the Simple ACDP was issued on August 5, 2002.
- c. The proposed PSELs for all pollutants are equal to the Generic PSEL in OAR 340-222-0041(1). A PSEL was not previously established for PM_{2.5} or GHG as these are newly regulated pollutants.
- d. The PSEL is a federally enforceable limit on the potential to emit.

SIGNIFICANT EMISSION RATE ANALYSIS

20. For each pollutant, the proposed Plant Site Emission Limit is less than the Netting Basis

plus the significant emission rate, thus no further air quality analysis is required.

TITLE V MAJOR SOURCE APPLICABILITY

CRITERIA POLLUTANTS

21. A major source is a facility that has the potential to emit 100 tons/yr or more of any criteria pollutant. This facility is not a major source of criteria pollutant emissions.

HAZARDOUS AIR POLLUTANTS

22. A major source is a facility that has the Potential to Emit more than 10 tons/year of any single HAP or 25 tons/year of combined HAPs. This source is not a major source of hazardous air pollutants. Uncontrolled emissions of Naphthalene could be as high as 10.5 tons per year, if the plant were operated at the maximum capacity of 4,380 charges per year. However, the maximum projected number of charges is only 2,625 per year, so uncontrolled actual emissions would be less than 10 tons per year. With the controls in place, the PTE is 5.1 tons per year and actual emissions have been and will be much less than the PTE.

Hazardous Air Pollutant	Potential to Emit (tons/year)
Naphthalene	5.06
Dibenzofuran	0.58
Quinoline	0.24
Biphenyl	0.21
Total	6.09

ADDITIONAL REQUIREMENTS

NSPS APPLICABILITY

40 CFR Part 60, Subpart Dc is applicable to the Cleaver Brooks boiler when it burns oil. This standard limits the amount of sulfur in the oil to 0.5% by weight and limits opacity to 20% as a six-minute average.

NESHAPS/MACT APPLICABILITY

23. On July 16, 2007, EPA adopted a National Emission Standard for Hazardous Air Pollutants (NESHAP) for wood preserving at area sources of HAP emissions (40 CFR Part 63, subpart QQQQQQ). The facility is not subject to this standard because the standard applies only to processes that use chromium, arsenic, dioxins or methylene chloride in the preservation process. The standards do not apply to pressure and thermal treatment processes that use creosote. However, the Department has incorporated the standards for pressure treatment systems as operation and management requirements in accordance with the highest and best practicable treatment and control regulation in OAR 340-226-0120.

RACT APPLICABILITY

24. The RACT rules are not applicable to this source because it is not in the Portland AQMA, Medford AQMA, or Salem SKATS.

TACT APPLICABILITY

25. There have been no changes at the facility that would require a Typically Available Control Technology (TACT) analysis.

PROPOSED TESTING

26. Several studies are proposed to better characterize volatile emissions from the facility. These studies may include sampling and testing according to protocols approved by DEQ.

PUBLIC NOTICE

27. Pursuant to OAR 340-216-0066(4)(a)(A), issuance of Standard Air Contaminant Discharge Permits require public notice. In accordance with OAR 340-209-0030(4)(a), DEQ will provide notice of the proposed permit action and a minimum of 35 days for interested persons to submit written comments. In addition a public hearing has been scheduled to allow interested persons to submit oral or written comments. **The public notice was issued on Dec. 19, 2014 with a hearing scheduled for Jan. 20, 2015 and the comment period ended on Jan. 30, 2015.**

ATTACHMENT A – PLANT SITE EMISSION DETAIL SHEET

Boiler Emission Detail:

Emissions Device or Activity	Pollutant	Usage Fuel	Emission Factor (EF)	EF Units	EF Reference	Emissions Per Year (tons/yr)
Boiler natural gas	PM/PM ₁₀ PM _{2.5}	214 10 ⁶ ft/yr	2.5	lb/10 ⁶ ft ³	DEQ	0.3
	SO ₂		2.6	lb/10 ⁶ ft ³	DEQ	0.3
	NO _x		100	lb/10 ⁶ ft ³	AP-42	10.7
	CO		84	lb/10 ⁶ ft ³	AP-42	9.0
	VOC		5.5	lb/10 ⁶ ft ³	AP-42	0.6
Boiler #2 distillate oil	PM	534 10 ³ gal/yr	3.3	lb/10 ³ gal	AP-42	0.9
	PM ₁₀		2.3	lb/10 ³ gal	AP-42	0.6
	PM _{2.5}		1.6	lb/10 ³ gal	DEQ	0.4
	SO ₂		71	lb/10 ³ gal	limit	19.0
	NO _x		20	lb/10 ³ gal	AP-42	5.3
	CO		5	lb/10 ³ gal	AP-42	1.3
	VOC		0.2	lb/10 ³ gal	AP-42	0.1

		Totals	
Total Boiler Emissions	PM		1.1
	PM ₁₀		0.9
	PM _{2.5}		0.7
	SO ₂		19.2
	NO _x		16.0
	CO		10.3
	VOC		0.6

Boiler Operating Parameters (annual fuel usage based on natural gas for 9 months and oil for 3 months):

Natural gas = 214 million cubic feet
 #2 Oil = 534 thousand gallons

Cyclone PM/PM₁₀/PM_{2.5} Emissions:

Pollutant	Annual Throughput	Emission Factor (EF)	EF Units	Emissions (ton/yr)
PM	8000 BDT/yr	0.5	lbs PM/BDT	2
PM ₁₀	8000 BDT/yr	0.425	lbs PM ₁₀ /BDT	1.7
PM _{2.5}	8000 BDT/yr	0.25	lbs PM _{2.5} /BDT	1

Medium Efficiency Cyclone

PM_{2.5} is 50% of PM 0.5 *50% = 0.25

PM₁₀ is 85% of PM 0.5 *85% = 0.425

Reference DEQ Emission Factor form AQ-EF03

Wood Treatment VOC Emissions:

Emission Point	Parameter/Throughput	Emission Factor	Annual Emissions (ton/yr)
Valves	431 Valves	0.000051 lb/hr	0.1
Relief Valves	5 Valves	0.023 lb/hr	0.5
Flanges	1101 Flanges	0.00018 lb/hr	0.9
Pump Seals	42 Pump Seals	0.0047 lb/hr	0.9
Storage Yard	See Amerities Spread Sheet (on file)		8.1
Retort Doors	2624 Charges	0.4 lb/charge	0.5
Vacuum Sys.	2624 Charges	0.1 lb/green charge	0.1
WWT			0.1
Insignificant	Constant value for drip pad, tank farm, process drains, hot sump, work tanks, and storage tanks		1.0
Total VOC			12.2

Note: The vacuum system emission factors include a 98.75% control factor

Hazardous Air Pollutants (Potential to Emit)

Amerities West – HAP Calculations from Natural Gas and Distillate Oil Usage

Natural Gas Combustion		
HAP	EF (lb/MMscf)	Emissions (tons/yr)
Antimony	2.00E-04	2.14E-05
Arsenic	2.00E-04	2.14E-05
Benzene	2.10E-03	2.25E-04
Beryllium	1.20E-05	1.28E-06
Cadmium	1.10E-03	1.18E-04
Chromium (total)	1.40E-03	1.50E-04
Cobalt	8.40E-05	8.99E-06
Dichlorobenzene	1.20E-03	1.28E-04
Formaldehyde	7.50E-02	0.01
Hexane	1.80E+00	0.19
Manganese	3.80E-04	4.07E-05
Mercury	2.60E-04	2.78E-05
Naphthalene	6.10E-04	6.53E-05
Nickel	2.10E-03	2.25E-04
Total POMs	8.82E-05	9.44E-06
Selenium	2.40E-05	2.57E-06
Toluene	3.40E-03	3.64E-04
Maximum Single HAP (tons/yr)		0.19
Total HAP (tons/yr)		0.20

EF factor AP-42 Table 1.4-3 and 1.4-4

Natural Gas Usage	214,000,000 Cubic Feet
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Amerities West – HAP Calculations from Natural Gas and Distillate Oil usage (Cont.)

Distillate Oil Combustion		
HAP	EF (lb/1,000gal)	Emissions (tons/yr)
Benzene	2.14E-04	5.71E-05
Ethylbenzen	6.36E-05	1.70E-05
Formaldehyde	3.30E-02	0.01
Naphthalene	1.13E-03	3.02E-04
1,1,1-Trichloroethane	2.36E-04	6.30E-05
Toluene	6.20E-03	1.66E-03
o-Xylene	1.09E-04	2.91E-05
Acenaphthene	2.11E-05	5.63E-06
Acenaphthylene	2.53E-07	6.76E-08
Anthracene	1.22E-06	3.26E-07
Benz(a)anthracene	4.01E-06	1.07E-06
Benzo(b,k)fluoranthene	1.48E-06	3.95E-07
Benzo(g,h,i)perylene	2.26E-06	6.03E-07
Chrysene	2.38E-06	6.35E-07
Dibenzo(a,h) anthracene	1.67E-06	4.46E-07
Fluoranthene	4.84E-06	1.29E-06
Fluorene	4.47E-06	1.19E-06
Indo(1,2,3-cd)pyrene	2.14E-06	5.71E-07
Phenanthrene	1.05E-05	2.80E-06
Pyrene	4.25E-06	1.13E-06
OCDD	3.10E-09	8.28E-10

EF Factor AP-42 Table 1.3-9

Metals		
Copper	1.76E-03	4.70E-04
Lead	1.51E-03	4.03E-04
Manganese	3.00E-03	8.01E-04
Selenium	6.83E-04	1.82E-04

EF Factor AP-42 Table 1.3-11

Maximum Single HAP (tons/yr)	0.01
Total HAP (tons/yr)	0.01

Distillate Oil Usage	534,000 gallons
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Summary of Natural Gas and Oil Combustion Total HAP (tons/yr)	0.21
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HAPs from Wood Treat Process

HAP	Without Controls (tons/yr)		Total	With Controls (tons/yr)		Total
	Point Sources	Fugitives		Point Sources	Fugitives	
Naphthalene	5.21	5.25	10.46	0.11	4.95	5.06
Dibenzofuran	0.59	0.60	1.19	0.01	0.56	0.58
Quinoline	0.25	0.25	0.49	0.01	0.23	0.24
Biphenyl	0.22	0.22	0.43	0.00	0.20	0.21
Total HAPs			12.57			6.09

Total HAPs

Source of Total HAPs	Tons/yr
Natural Gas Combustion	0.20
Distilled Oil Combustion	0.21
Wood Treat Process (with controls)	6.09
Total HAPs	6.5

Greenhouse Gas (GHG) Emissions:

Greenhouse Gas (GHG) Calculations- Equivalents					Emissions GHG-CO ₂ e	
Emission Device or Activity	Usage (mmscf)	GHG Pollutant	Natural Gas EF (lb/mmcf)	GWP	Short tons/yr	Metric tons/yr
Fuel Burning Natural Gas	214	CO ₂	120,162	1	12857.33	11,667.26
		CH ₄	2.27	21	5.10	4.62
		N ₂ O	0.23	310	7.63	6.92
	Usage (1000 gal)		Distillate Oil (lb/1000 gal)			
Fuel Burning Distillate Oil	534	CO ₂	163.05	1	43.53	39.5
		CH ₄	0.0066	21	0.04	0.03
		N ₂ O	0.0013	310	0.11	0.09

1.102 GHG CO₂e short tons = 1 GHG-CO₂e metric ton

Short Tons Total GHG –CO₂e/yr Emissions	12914
Metric Tons Total GHG-CO₂e/yr Emissions	11,718

If the calendar year emission rate of greenhouse gases (CO₂e) is greater than or equal to 2,756 tons (2,500 metric tons), the permittee must register and report its greenhouse gas emissions with DEQ in accordance with OAR 340-215. The Department would suggest the company contact the DEQ Greenhouse Gas Program contact person to learn more about registering and reporting greenhouse gas emissions through EZ-File: www.deq.state.or.us/aq/climate/permitHolder.htm

PUBLIC HEARING REPORT AND RESPONSE TO COMMENTS

Public Hearing Report for renewal of the Standard Air Contaminant Discharge Permit No. 33-0003-ST-01, Amerities West LLC, The Dalles, Oregon

Background

On January 20, 2015, DEQ held a public hearing at the Columbia Gorge Community College Lecture Hall, Building 2, third floor, located at 400 E Scenic Drive, The Dalles, Oregon. The purpose of the hearing was to accept public comments relating to the draft renewal of the Standard Air Contaminant Discharge Permit No. 33-0003 for Amerities West LLC in The Dalles.

Greg Svelund (DEQ Eastern Region Communications Officer) was the hearings officer. Frank Messina (DEQ Permit Writer) provided an introduction and overview of the main permit actions in the permit. During the hearing, in a separate conference room, three tables were set up to respond to questions from the public: Bryan Smith (DEQ Small Business) was present to respond to questions related to the DEQ Nuisance Strategy; Frank Messina to respond to questions related to the draft air permit renewal; and Dave Farrer (Oregon Health Authority) to respond to health related questions.

About 75 people attended the meeting and 15 people made public comment. DEQ also received 28 written comments during the public comment period, which closed at 5 p.m. on Friday, January 30, 2015.

The public comments and the written comments were summarized into individual questions and concerns. Attached is a list of people that made comments at the hearing and the people that submitted written comments.

DEQ received comments that addressed various aspects of Amerities West, including the importance of jobs in The Dalles, the need for economic development, and general odor concerns among others. In fact, most of the comments – both written and verbal, addressed aspects of the project that are not directly related to permit conditions. A summary of comments is included below:

1. **Comment:** Why weren't elements of the Long-Term Strategy in the current permit ever implemented? The Long-Term Strategy address cost effectiveness Why not?

Response: Amerities West was required to submit a [long-term strategy](http://www.deq.state.or.us/er/docs/AmeriTiesWest/LongTermStrategy.pdf) (www.deq.state.or.us/er/docs/AmeriTiesWest/LongTermStrategy.pdf) for reducing odors, which the company did. The permit did not require further action or implementation of the strategy. DEQ may look at those strategies and consider other Best Work Practices the company could implement as part of the DEQ Nuisance Strategy.

2. **Comment:** There are odor issues from Amerities West operations and people cannot enjoy their own property. Also, unpleasant odors make people feel ill, which is a health issue.

Response: DEQ addresses odor issues as part of the [DEQ Nuisance Strategy](http://www.oregon.gov/deq/Pages/Nuisance-Strategy.aspx) (<http://www.oregon.gov/deq/Pages/Nuisance-Strategy.aspx>)

3. **Comment:** Amerities West has a facility in Hope, Arkansas that has a venture oil scrubber. Why don't they have this type of system in The Dalles facility? Amerities West needs to commit to changes and reduction of odors.

Response: DEQ has been in discussion with Amerities West on Best Work Practices and what other similar facilities are doing to control emissions and odors. Comparisons to other similar facilities are something that could happen under the odor nuisance strategy.

4. **Comment:** Amerities West is a Clean-up/Super Fund site. How is this going to be addressed?

Response: The DEQ Cleanup Program is evaluating the Union Pacific Railroad Tie Treating Plant site. For information about this site take a look at the [Environmental Cleanup Site Information Database, Site ID 54](#) at (www.deq.state.or.us/Webdocs/Forms/Output/FPController.ashx?SourceId=54&SourceIdType=11).

5. **Comment:** Amerities West has enough profits to fund odor reduction efforts. Why can't they install pollution controls to reduce the odors?

Response: DEQ addresses odor issues as part of the DEQ Nuisance Strategy.

6. **Comment:** What about the health of the workers at the Amerities West facility? Who protects them from exposure to chemical smells at the plant?

Response: The Oregon Occupational Safety and Health (OSHA) under the Oregon Department of Consumer and Business Services regulate the health and safety of workers.

7. **Comment:** There is a nuisance condition in the permit, why has the DEQ not declared Amerities West a nuisance?

Response: The nuisance condition in the permit applies to companies that have been designated a nuisance, which happens through DEQ's Odor Nuisance Strategy. Amerities West has not been designated a nuisance, though DEQ has received a sufficient number of odor complaints to begin an odor investigation of Amerities West.

8. **Comment:** Why is the air quality monitor located at Cherry Hill instead of being closer to the Amerities West plant?

Response: The monitor located at Cherry Hill measures particulate matter, which isn't a pollution of concern for Amerities. DEQ has this monitor in The Dalles to ensure compliance with federal air quality standards for particulate matter. It is not capable of monitoring for hazardous air pollutants or other chemicals.

9. **Comment:** DEQ permits 254 tons of pollutants to be released yearly in the air we breathe. The DEQ permits about 6 tons of HAPS (Hazardous Air Pollutants) of which 5 tons of this are naphthalene (a substance used in wood preservation and moth balls). In the 1970's the EPA recommended discontinuing the use of creosote to treat wood cross ties. The industry was admonished for its "denial of scientific data concerning the mutagenicity and carcinogenicity of the wood preservatives." Despite this, the railroad successfully lobbied for its continued use of cross tie treatment.

Response: DEQ is required by state rule to issue permits to all facilities that meet state and federal regulations. As Amerities West met all applicable air quality regulations, DEQ issued the permit.

10. **Comment:** In 1995 the Oregon legislature established the statewide registry to provide information to design, target, monitor, facilitate, and evaluate the efforts to determine the causes of, or sources of cancer in Oregon. I wonder if findings have been published by now for The Dalles, and if those findings are broken down by neighborhoods in the city.

Response: The best source for health-related questions is your local health department or the Oregon Health Authority.

11. **Comment:** In the last permit Amerities West worked with DEQ on conducting ambient monitoring. What were the results?

Response: Amerities-West conducted monitoring on September 7, 2011 for 8 hours and February 7, 2012 for 24 hours. View the Air Sampling Summary Report on DEQ's [AmeriTies West](http://www.deq.state.or.us/er/AmeriTiesWest.htm) web page at www.deq.state.or.us/er/AmeriTiesWest.htm.

12. **Comment:** How effective is the water mist used to dampen the creosote fumes from escaping? Is there a figure for percent reduction in fumes or a comparison of average amount of fumes now as compared to past years? Are records kept?

Response: Presently the mister systems over the retort doors are required to be on when the doors are open and the facility is required to document that these controls are operating during these actions. The mist system does control the odor, but it is not known how much it controls the odor.

13. **Comment:** Has the railroad tie industry looked at alternatives to different treatment solutions and different ties?

Response: DEQ has been in discussion with Amerities West on alternatives, though the company continues to prefer the current coal tar treatment process.

14. **Comment:** Has the industry investigated and considered capturing the fumes more effectively and burning them with intense heat to reduce emissions into the atmosphere?

Response: Controlling the emissions in close proximity of the opening of the retort doors is an issue. Also the emissions coming off of the hot treated ties immediately coming out of the retorts is an issue. DEQ believes this evaluation of additional emissions control measures will be addressed through the Nuisance Strategy.

15. **Comment:** The method of calculating how many tons of chemicals is in the air from how much creosote is used is not valid. Air monitors are needed.

Response: The use of emission factors in calculating the emissions from facility operations are normal practices in many air discharge permits. The new permit contains an emission factor review. This condition requires the facility to verify the factors used, with oversight by DEQ.

16. **Comment:** 5 years ago DEQ included language in the permit that required Amerities to seriously pursue an odor reduction strategy in response to legitimate complaints about smell. Amerities has not fulfilled this requirement.

Response: Amerities-West was required to submit a long-term strategy for reducing odors, which the company did. The permit did not require further action or implementation of the strategy. DEQ may look at those strategies and consider other Best Work Practices the company could implement as part of the DEQ Nuisance Strategy.

17. **Comment:** There is no showing that the facility does not have a physical potential to emit at these rates and other than the Plant Site Emissions Limits (PSELs) there are no explicit operation limitations that would constitute a limit on the facility's potential to emit (PTE). Compliance with the PSEL should be established through continuous emission monitoring to the extent possible, and in the alternative using emission factors based on source testing. The emission factor study DEQ requires should have been prepared prior to the issuance of the draft permit, not after.

Response: This facility has a Standard Air Contaminant Discharge Permit with a standard Plant Site Emission Limit under the Significant Emission Rate as required under Oregon Administrative Rules (OAR) 340-222-0040. Demonstrating compliance through the use of emission factors is a common practice for many regulatory agencies. Placing a continuous emission monitor at this facility is impractical because most of the emissions are fugitive and

the best way to calculate the emissions are through their emission factors. The reasoning for the emission factor review is to verify that the correct emission factor is being used. This is common practice in air quality permitting.

18. **Comment:** The DEQ should issue findings addressing whether issuance of the permit would be consistent with the purposes of the National Scenic Area Act and consistency with the Gorge Air Quality Strategy.

Response: DEQ is required by rule to issue permits to any facility that can prove compliance with all applicable state and federal regulations. Also, these documents address visibility issues in the Gorge and visibility is not an issue with this facility.

19. **Comment:** Hazardous Air Pollutant emissions are not adequately addressed in the draft permit or review report, as byproducts of natural gas and fuel oil combustion are not addressed.

Response: An additional table was added to the Review Report showing the low amount of HAPs emissions from the natural gas and fuel oil combustion from the boiler operations.

20. **Comment:** Why does the permit increase the fine particulate matter emission limit to 14 tons/year?

Response: There was no increase in the amount of particulate matter emissions from the last permit. This is covered in Item 19 in the Review Report under “Proposed PSEL information.”

21. **Comment:** I would like to remind DEQ of their duty to comply with the Clean Air Act, including its duty to protect public health.

Response: DEQ acknowledges the comment. DEQ also acknowledges state rules which require the agency to issue permits to any facility that can prove compliance with state and federal regulations.

22. **Comments** on a few conditions in the draft permit:

- a) **Re Section 6.2:** It would be better to require the reporting of the actual Naphthalene content at the time of purchase, rather than the expected content.

Response - Sec. 6.2: Using the expected content calculation is normal practice in air quality permitting.

- b) **Re Section 6.5:** Actual sampling of real emissions should be required. Emission factor reviews will only improve the existing data.

Response - Sec. 6.5: Under this condition Emission Factor Review will be an evaluation which may include some testing to show verification of the emission factors used in the permit.

- c) **RE Section 4.0:** There should be sampling required to determine if process emission limits are met.

Response - Sec. 4.0: Calculating the emissions with emission factors is normal practice in air quality permitting.

Amerities West Public Hearing:

List of People that made verbal comments:

1. Michael Byrne
2. Eduard Michael Moore
3. Kim Folts
4. Rick Till
5. Kristina Cronkright
6. Jeff Thompson
7. Rodger Pettit
8. Beatrice Pettit
9. Peni Enesi
10. John Nelson
11. Wayland Huteson
12. Mike Balanger
13. Heather Cox
14. Roy Hallorans
15. Barbra Thompson
16. Kristina Cronkright

List of People that submitted written comments:

- | | |
|---------------------------|--|
| 17. John Windsor | 31. Rick Till (<i>Friends of the Columbia Gorge</i>) |
| 18. Sara Culp | 32. Molly Hamlin |
| 19. Rebecca Brochu | 33. Beatrice Pettit |
| 20. John Nelson | 34. Peter Cornelison |
| 21. Daniel Wlaters | 35. Luise Langheinrich |
| 22. Cheryl Stewart | 36. Sandie/Gary Hertel |
| 23. Ken/Vicki Martin | 37. Brian/Gloria tuck |
| 24. Nancy Williams | 38. David Berger |
| 25. Tom Turner | 39. Rex Tegan |
| 26. Doug/Barbara Tumilson | 40. Lee Thornton |
| 27. Michael Byrne | 41. Wayland J. Huteson |
| 28. John Nelson | 42. Lance Bliss |
| 29. Kimberly Folts | 43. Barbara Schroeder |
| 30. Kris Cronkright | 44. Norman Bennett |