



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
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August 8, 2019

AmeriTies West LLC
PO Box 1608
The Dalles, OR 97058

Mr. Thompson,

DEQ appreciates the submittal of the Cleaner Air Oregon Air Toxics Emissions Inventory Form AQ405CAO for AmeriTies West, LLC in The Dalles, OR. DEQ received your submittal on June 3, 2019 and has completed an initial review.

Based upon our initial review, DEQ has identified a number of deficiencies in your June 3, 2019 submittal. According to OAR 340-245-0030(2), DEQ is requesting you submit additional information, corrections and updates to the Emissions Inventory by no later than August 28, 2019.

Given past discussions related to establishing accurate emissions estimates, it is likely that DEQ will require source testing on a number of emissions units in order to ensure we have a sufficiently accurate representation of these emissions in order to accurately calculate risks. DEQ acknowledges the challenges in establishing an accurate inventory of emissions for this facility, but filling these longstanding and substantial data gaps is a high priority for further work under CAO.

Specific Comments

1. Revise the submittal to include Toxic Air Contaminant emissions from onsite "Wastewater Treatment (WWT)" and "Sump Tank" processes identified in Section 3.2 of your Standard Air Contaminant Discharge Permit.
2. Provide all methods, assumptions, and calculations used to determine activity levels for the following Toxics Emissions Units:
 - a. Drip Pad [ft³/yr]
 - b. Storage Yard [tie-equivalents/yr]
 - c. Equipment Leaks [total components]
3. For all Toxic Air Contaminant emission factors reported as "Vapor Mass Fraction", provide all methods, calculations, and cited references used to establish emissions in this submittal, including but not limited to the following:
 - a. "Storage Yard, Drip Pad, and Retort Door Opening Annual Emissions Estimates" prepared by AquAeTer, Inc. dated May 2019.
 - b. "Polynuclear Aromatic Hydrocarbon Analysis Report" prepared by RJ Lee Group dated May 14, 2019.
 - c. "Air Emissions Inventory Guidance Document for Stationary Sources at Air Force Installations" (December 2003)
 - d. "Characteristics of Spilled Oils, Fuels, and Petroleum Products-Composition and Properties of Selected Oils" report (EPA/600/R-03/072) prepared by the National Exposure Research Laboratory Office of Research and Development US EPA

4. Provide data to substantiate temperature data used in calculation methodologies – e.g., retort fugitives, storage yard temperatures, and operating temperatures of all Storage, Vent, and Work Tanks.
5. As per Mutual Agreement and Order No. AQ/AC-ER-16-067 (MAO), Amendment 2, Table 1, Strategy C.1, AmeriTies West LLC prepared an Oil Scrubber Evaluation Report in 2017. This report indicates the scrubber is operating at variable removal efficiencies over time, which will affect the 98.75% overall control efficiency assumption reported in this submittal. Please revise this submittal to reflect the findings of this report or otherwise substantiate the usage of the 98.75% overall control efficiency with supporting data.
6. Please provide safety data sheets and usage records or purchase information, as available, for products cited in the Material Balance tab, including:
 - a. “Krylon Flat Black Spray Paint”
 - b. “Krylon Weekend Spray Paint Chrome Aluminum”

Please note the following if you think some or all of this information should be treated as “Confidential Business Information:

In order for DEQ to exempt Emissions Inventory submittal data not already publicly available, DEQ must obtain the requested emissions information along with the verification of this claim in accordance with OAR 340-214-0130, specifically sub-sections 2(b) and 3(a-e) as follows:

(2) If an owner or operator claims that any writing, as that term is defined in ORS 192.410, is confidential or otherwise exempt from disclosure, in whole or in part, the owner or operator must comply with the following procedures:

(a) The writing must be clearly marked with a request for exemption from disclosure. For a multi-page writing, each page must be so marked.

(b) The owner or operator must state the specific statutory provision under which it claims exemption from disclosure and explain why the writing meets the requirements of the provision.

(c) For writings that contain both exempt and non-exempt material, the proposed exempt material must be clearly distinguishable from the non-exempt material. If possible, the exempt material should be arranged so that it is placed on separate pages from the non-exempt material.

(3) For a writing to be considered exempt from disclosure as a “trade secret,” it must meet all of the following criteria:

(a) The information cannot be patented;

(b) It must be known only to a limited number of individuals within a commercial concern who have made efforts to maintain the secrecy of the information;

(c) It must be information that derives the actual or potential economic value from not being disclosed to other persons; and

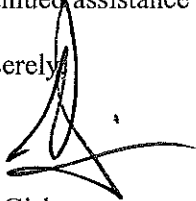
(d) It must give its users the chance to obtain a business advantage over competitors not having the information.

(e) It must not be emissions data.

Please communicate any questions or clarifications regarding the above comments proactively in order to provide a timely, revised submittal by August 28, 2019. DEQ remains available during this timeframe to discuss the submittal with you and answer any questions you may have. Failure to provide additional information or corrections required by DEQ by this date may result in a violation of OAR 340-245-0030(1) and OAR 340-245-0040(1).

Once we receive this additional information, we will complete our review of the Emissions Inventory. Please contact me directly at 503.229.5178, giska.jonathan@deq.state.or.us), and we look forward to your continued assistance with this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'J.R. Giska', with a stylized flourish extending to the right.

J.R. Giska
DEQ CAO Program Engineer

Cc: Keith Johnson, DEQ
Kenzie Billings, DEQ
Mark Bailey, DEQ
Frank Messina, DEQ
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