Oregon
Kate Brown, Governor

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January 22, 2021

AmeriTies West LLC
PO Box 1608
The Dalles, OR 97058

Mr. Thompson,

DEQ has reviewed the information and comments submitted by AmeriTies West LLC (AmeriTies) on April 10, 2020 in response to the comment letter issued by DEQ on March 11, 2020 addressing information required for approval of the Emissions Inventory (Inventory) for your facility as required by the Cleaner Air Oregon (CAO) program. DEQ also met with AmeriTies on November 20, 2020 to discuss the status of the Inventory and the source testing required to provide a complete and approvable Inventory for the purposes of the CAO program. DEQ appreciates the continued dialogue on these challenging issues.

Specific Comments

1. DEQ approved the Notice of Intent to Construct #32430 (NC) on June 3, 2020, to construct and operate the proposed capture and control system for the retort operations as described in your April 10, 2020 response letter. The source testing requirements DEQ provided previously in a comment letter on March 11, 2020 have been updated (see below) to reflect those operational changes.
2. DEQ maintains that the theoretical basis and correction factors used to develop the Toxic Air Contaminant (TAC) emissions calculations for the Drip Pad and Storage Yard Toxics Emissions Units (TEUs) at your facility are insufficient for the purposes of assessing risk under the CAO program. Further, DEQ is concerned that the use of these methods would result in substantial under reporting of potential emissions, as highlighted by the significant (approximately 100X) decrease in estimated emissions of naphthalene from these TEUs as reported in the submitted CAO emissions inventory, as compared to the annually reported emissions. DEQ requires that you perform source testing for these TEUs so that these emissions from your facility are quantified in a more verifiably accurate manner. However, given the operational changes proposed in the NC regarding retort door operations, and depending on the proposed source sampling plan, DEQ may allow emissions from the Drip Pad TEU to be included into a single Storage Yard TEU in the CAO emissions inventory.
3. In accordance with the definition of source [OAR 340-200-0020(166)], DEQ requires that TAC emissions from storage of ties in railcars maintained on-site be included in your Inventory, as these products remain under the control of AmeriTies. Please provide a revised Inventory with a new significant TEU for Rail Car Storage fugitive emissions. Also provide the location of this TEU and the configuration of these stored ties, as these data will affect the emission estimates and modeling from this TEU.

Source Testing

DEQ recognizes that significant changes in operating procedures are being implemented at the facility

with the installation of a Regenerative Thermal Oxidizer (RTO) control device and fully enclosing the retort deck area and building (Retort Building). In order to provide a complete CAO Inventory that can be used to more accurately assess risk from your facility, pursuant to OAR 340-212-0120, DEQ requires you to source test the following TEUs at your facility:

i. **Retort Building**:
   a. EPA Method 204 must be performed to establish the Retort Building as a Permanent Total Enclosure (PTE). Because the retort building was not originally designed as a PTE, DEQ requires that the alternative criteria provided in Method 204 (Procedure, Step 8.3), that is based on a pressure drop of 0.013 mm Hg (0.007 in. H2O), must be used to establish the Retort Building as a PTE.
   b. The Retort building must be determined to be a PTE in order to waive the inlet testing to the RTO (see below), as this would ensure no fugitive emissions from retort door openings need to be accounted for in the Inventory.
   c. If the Retort Building is not determined to be a PTE, the actual capture efficiency must be determined using a tracer gas study or other DEQ approved procedure to determine the amount of fugitive emissions from retort door operations.

ii. **RTO**:
   a. Sampling plans must include three (3) sampling events which include one (1) retort operating with copper naphthenate treatment solution, and the remaining retorts operating with creosote treatment solution.
   b. If the Retort Building is not determined to be a PTE (see above in (i)(a)), then the RTO inlet must be sampled using Modified EPA Method 23, or similar method upon DEQ approval, to sample for each PAH and PAH-derivative listed in OAR 340-245-8020 Table 2, in order to assess fugitive emissions from the Retort Building TEU.
   c. The RTO outlet must be tested for the following using Modified EPA Method 23 to sample the following Toxic Air Contaminants (TACs) listed in OAR 340-245-8020 Table 2:
      1. Each dioxin and furan congener, as well as totals for each class of congeners (e.g., Total tetrachlorodibenzo-p-dioxins, Total hexachlorodibenzofurans).
      2. Each PAH and PAH-derivative.

iii. **Treated Tie Storage**: DEQ requires the development of site specific emission factors for the fugitive emissions from the stored ties treated with the creosote treatment solution for PAHs and PAH-derivatives listed in OAR 340-245-8020 Table 2. DEQ understands the complexities involved in sampling these emissions and remains open to discussing different sampling options for these emissions.

iv. **Boiler 2**: Due to the limited amount of distillate fuel usage permitted for use in the boiler, DEQ will not require testing of this TEU.

v. **Diesel Scrubber**: DEQ understands that there are operational modifications occurring at the facility that will change which emissions are routed to the Diesel Scrubber. If these changes do not re-route all of the current emissions to this control device then the Diesel Scrubber will still be a source of TAC emissions that must be tested for PAHs and PAH-derivatives using Modified EPA Method 23, or a DEQ-approved alternative method.

Source testing of the Retort Building, RTO, and the Treated Tie Storage, as stipulated above, must be completed within **90** days from the issuance date of this letter. A source testing plan must be submitted no later than **30** days prior to source testing. Once all operational changes and ductwork has been completed for the installation of the RTO, DEQ will determine if source testing of the Diesel Scrubber is required.

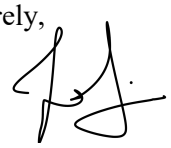
Once DEQ has reviewed and approved the source testing plan, a submittal deadline will be established for

providing the completed Inventory (including information required from Comment #3 above), the Modeling Protocol, and the Risk Assessment Work Plan, if applicable.

Please communicate any questions or clarifications regarding the above comments and source sampling requests proactively in order to provide a timely and satisfactory response. 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 enforcement.

Please contact me directly at 971.337.4102, (JR.giska@deq.state.or.us), and we look forward to your continued assistance with this process.

Sincerely,



J.R. Giska
DEQ CAO Program Engineer

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