Oregon
Kate Brown, Governor

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June 22, 2021

AmetiTies West, LLC
PO Box 1608
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Mr. Thompson,

DEQ has reviewed the source test plan submitted by Bison Engineering on behalf of AmeriTies West, LLC (AmeriTies) on June 4, 2021. Based on this review, DEQ requires that the following issues be addressed in a revised source test plan. A revised source test plan is due at least 15 days prior to the planned testing, which is currently scheduled to start July 20, 2021.

General Comments

DEQ issued a letter to AmeriTies on January 22, 2021 requiring the following source testing in order to complete the Emission Inventory required under the Cleaner Air Oregon (CAO) program:

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.

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.

The proposed source testing in this source test plan only covers items i.a., ii.a., and ii.c. of the source testing that is required to complete the CAO Inventory.

Specific Revision Comments

1. Page 6, Table 1. Please revise particulate reporting units to be gr/dscf (grains per dry standard cubic foot).
2. Page 11, Table 2. EPA Method 4 needs to be concurrent with EPA Method 25A. Please revise the RTO inlet Method 4 duration to 3-hour test runs.
3. Page 15. Please revise operational parameters to be recorded to include the following:
    a. RTO combustion chamber temperature
    b. RTO cycle time
    c. Temperature of the ties from the front and rear of the tram when they are removed for the retort
    d. The times and duration when the mega-pack door is opened and closed.

DEQ recognizes the unique challenges this testing pose to your facility and operations, and the results will provide valuable information for completing the risk assessment. If you have any questions or concerns please contact me directly. Thank you for your continued efforts with this process.

Sincerely,

Thomas Rhodes

Thomas Rhodes
DEQ CAO Source Test Coordinator

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