



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

June 29, 2021

Kelly Dorsi, PhD
Bison Engineering, Inc.
3143 East Lyndale Avenue
Helena, MT 59601

Re: AmeriTies West, LLC
ACDP No. 33-0003

Ms. Dorsi,

The Oregon Department of Environmental Quality (DEQ) received a revised source test plan from Bison Engineering on behalf of AmeriTies West, LLC (AmeriTies) on June 23, 2021 for testing emissions from the Regenerative Thermal Oxidizer (RTO) control device. These testing requirements are stipulated in the Notice of Intent to Construct (NC) #32430 that DEQ approved on June 3, 2020, and are required for the purposes of completing an emissions inventory for the Cleaner Air Oregon (CAO) program, as well as developing operating conditions to be specified in the Air Contaminant Discharge Permit. Based on our review the source test plan is approved with the following comments.

General Comments

1. Due to the sampling run durations and process operations DEQ approves sampling replicates to be separated by more than 24 hours.
2. DEQ approves the requested Method 23 analytical deviation to quantify the analytes listed in Appendix B of the source test plan.
3. A leak check must be performed before and after replacing any portion of a sample train during a test run.

Any further modifications and/or alternatives to testing methods or procedures that are implemented to satisfy DEQ testing requirements must receive approval from DEQ prior to their use in the field. Changes not acknowledged by the DEQ could be the basis for invalidating an entire test run and potentially the entire testing program.

DEQ appreciates the continued assistance with this process. As approved, the results of this testing plan would meet the source testing requirements stipulated in the NC #32430. The results will provide valuable information that will help us better understand emissions from the facility. Please coordinate directly with me regarding the testing schedule as I intend to monitor testing at the site. 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

Cc: Lance Bliss, AmeriTies West
Jeff Thompson, AmeriTies West
Brian Snuffer Zukas, Maul Foster & Alongi
Tom Wood, Stoel-Rives
Keith Johnson, DEQ
J.R. Giska, DEQ
Frank Messina, DEQ
Ania Loyd, DEQ
Mark Ludwiczak, DEQ
File