

Fact Sheet - J.H. Baxter Draft Air Contaminant Discharge Permit (ACDP) Renewal

Public Notice: LRAPA is providing notice about an informational meeting about the draft renewal of the Air Contaminant Discharge Permit (ACDP) for the JH Baxter wood treatment facility. LRAPA staff will review the draft permit and be available for questions and answers to those interested in the draft ACDP renewal. An additional informational meeting is scheduled to occur at 6-7pm on September 22 to be followed by the formal public hearing at 7pm. The following meetings have been scheduled:

Informational Meeting	Public Hearing
6pm – 9pm Thursday August 26, 2010 Red Cross Building 862 Bethel Drive Eugene, OR	6pm-7pm: Informational Session 7pm: Formal Public Hearing Wednesday September 22, 2010 Red Cross Building 862 Bethel Drive Eugene, OR
See www.lrapa.org for draft permit, supporting materials, and announcements	See www.lrapa.org for draft permit, supporting materials and announcements

LRAPA has not received request for a hearing on the draft renewal but we anticipate that the facility's draft renewal will be of significant public interest. Therefore, we have scheduled the informational meeting and public hearing to provide the greatest level of public notice and opportunity for participation that is specified in LRAPA rules and regulations for the draft permit renewal.

Draft Permit Key Elements: The following are a few of the significant improvements made to the draft permit as compared to the existing ACDP in effect for the facility. Many of the new, draft permit requirements roll-in the elements established through the Best Work Practices Agreements (BWPA) required by way of LRAPA's Title 49 – Nuisance Control Requirements as well as other LRAPA and EPA requirements:

New Requirement or New Draft Permit Condition	Reason for New Requirement	Draft Permit Condition
Annual production limit of 1 million cubic feet of creosote treated material.	Permit formerly had an annual production limit of 3 million cubic of treated material. The new limit provides a cap on the most significant source of odor emissions.	3
Process changes including the vacuum, condenser and water pumps to improve control and reduce emissions from the wood treatment process vessels (retorts).	Provides a significant improvement over the steam ejectors that essentially provided no control for these emissions.	4.a., 4.b., 4.c.
Operational changes to increase volume of air moving over	Reduces fugitive emissions from treated material that would otherwise be emitted after	4.d

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treated material within the retort to more effectively cool the charges (treated material).	charge is removed.	
Vapor phase carbon adsorption unit control to reduce emissions from retorts and work tanks (carbon absorption unit).	Carbon adsorption unit provides an estimated reduction of 80% of the emissions vented to the control device where these emissions were uncontrolled.	4.f
Stack testing of the carbon adsorption unit within 180 days of permit issuance.	Permit requires that the facility quantify the control and capture efficiency of the carbon adsorption unit.	16 through 21
Operate and maintain a treated product storage plan.	Treated product storage plan identifies practices and procedures used to minimize on-site storage of treated material. LRAPA estimates indicate that fugitive emissions from on-site storage of treated material are one of the most significant sources of potential odors.	4.i
Operate and maintain an Ecosorb-based odor reduction practice.	The use of Ecosorb in the wood treatment process was identified as one potentially effective way to reduce emissions. Ecosorb is a compound where the active ingredient is a mix of natural, essential oils.	4.h
Prepare and follow an LRAPA-approved Operation and Maintenance (O&M) plan.	O&M plan will require, among other things, that the facility outline and follow a schedule to properly maintain control equipment, identify corrective actions when control equipment may not be performing at highest reasonable efficiency, and identify process parameters used to indicate properly functioning processes.	24.
Monthly emission estimations and annual reporting of emissions.	Facility is required to estimate emissions on a monthly basis and submit annual reports to LRAPA. The permit formerly only required that the facility keep emission estimates and production records onsite.	22, 23, 26
Incorporate EPA-required National Emission Standard for Hazardous Air Pollutants (NESHAP) for Wood Preserving Area Sources (Subpart QQQQQQ)	Incorporates into the draft permit the required elements from the Wood Preserving NESHAP including the requirement that the facility minimize preservative usage and emissions.	12 through 15

Other Aspects: In addition to the draft permit and supporting documents available on the LRAPA website (www.lrapa.org), we can also provide the health studies performed by the Oregon Department of Health Services in response to petitions from concerned neighbors. Also of interest may be the document titled “Timeline of J.H. Baxter Air Permitting”, that outlines and summarizes many of the significant occurrences and events that lead to the development of the draft ACDP renewal.