

Timeline Table of Events Relative to JH Baxter Air Permitting

Year	Item	Date
1943	JH Baxter (JHB, Baxter or the facility) began operations at current location	NA
1975	Permitted by LRAPA	NA
1990's	Complaints received about Baxter range from 10 to 30 per year	NA
1995	LRAPA and Baxter enter into discussions regarding odor abatement. Baxter voluntarily commits to odor abatement of both ammonia and creosote and pentachlorophenol treatment processes.	December 1995
1999	JHB notified LRAPA of completion of ammonia emissions reduction project and states that further efforts will be focused on reductions from creosote systems	October 1999
2000	JHB notified LRAPA of efforts to minimize odors associated with creosote treatment process including: <ul style="list-style-type: none"> ○ use of lower naphthalene-containing creosote ○ complete design of rail unloading area fume reduction system 	May 2000
2001	LRAPA adopts the Title 49 Nuisance Control Requirements	October 2001
2001	LRAPA declares the facility a "suspected nuisance" due to odor complaints	December 2001
2002	Odor complaints received increase to 63 for the calendar year	Jan-Dec 2002
2003	Baxter and LRAPA begin negotiating Best Work Practices Agreement (BWPA)	NA
2003	Baxter installs vacuum pump and condensers on retorts 83 and 85	May 2003
2003	Baxter claims to reduce onsite inventory in an effort to reduce odors from treated wood storage	June 2003
2003	In response to requests from concerned residents, LRAPA asked the Superfund Health Investigation and Education (SHINE) division of the Oregon Department of Health Services to evaluate the potential health risk incurred by persons living near the facility: <ul style="list-style-type: none"> ○ See: http://www.oregon.gov/DHS/ph/ehap/bxsite.shtml 	October 2003
2003	Baxter changes process to lower retort temperatures to reduce odors	October 2003
2003	Baxter installs third vacuum pump to reduce odors from creosote treating	November 2003
2003	Baxter installs new vacuum pump sealing water pumps on the vacuum systems on retorts 81 and 85 to improve the vacuum system operation and to increase the effectiveness of the end of treatment cool-down cycle	December 2003
2003	SHINE and Lane County Environmental Health Department (along with LRAPA) make a personal visit to the site	December 9, 2003
2003	SHINE hosts a public meeting in Eugene to meet concerned residents and receives more than 50 comments (December 9, 2003). Residents petition SHINE to investigate the incidence of myelogenous leukemia (AML) and brain cancer.	December 9, 2003
2004	Baxter modifies valves and piping on retorts 83 and 85 to increase the volume of air moving over treated material within the retort to more effectively cool the charge	January 2004

Year	Item	Date
2004	SHINE releases Health Consultation Report recommending: <ul style="list-style-type: none"> ○ LRAPA develop and implement a comprehensive air-sampling program ○ Oregon State Cancer Registry and Department of Human Services work with the community to conduct a cancer cluster investigation for elevated cases of AML. 	October 2004
2005	LRAPA and Baxter sign the Best Work Practices Agreement requiring, among other things, a carbon adsorption unit to treat vent streams.	February 10, 2005
2005	Over a period of two years, LRAPA conducts at least 15 ambient sampling events in surrounding neighborhoods to measure upwind and downwind concentrations for chemicals known to be emitted from facility	January 2005 – December 2006
2005	Vapor phase carbon adsorption unit placed into service. Tanks 2, 4, 7 and vacuum pump exhausts controlled initially.	July 27, 2005
2005	Vapor phase carbon adsorption unit controls vents from Tanks 9, 25, 26, and 27.	September 1, 2005
2005	Engineering Effectiveness Report submitted by Baxter as required by BWPA. Identifies effectiveness of existing controls and identifies new control options.	November 22, 2005
2006	LRAPA hosts informational meeting for JH Baxter neighbors to discuss Engineering Effectiveness Report and control options.	January 10, 2006
2006	LRAPA hosts informational meeting for JH Baxter neighbors to discuss Engineering Effectiveness Report and control options.	April 9, 2006
2006	SHINE releases “Cancer Investigation for Three Neighborhoods Surrounding J.H. Baxter & Co. and Other Industrial Sites”	September 1, 2006
2006	BWPA Addendum is signed by Baxter and LRAPA to include additional controls selected as best options from Engineering Effectiveness Report, as well as other elements to reduce odors	October 19, 2006
2007	Baxter submits “Ecosorb Pilot Test Technical Memorandum” providing results of an Ecosorb-based misting system above retort doors.	February 2007
2007	SHINE releases “Follow-Up Baxter Health Assessment Based Upon New Monitoring Data” and hosts public meeting to discuss the report with neighbors (May 17, 2007).	May 2007
2007	EPA promulgates National Emission Standard for Hazardous Air Pollutants (NESHAP) for wood preserving facilities (Subpart QQQQQQ).	July 16, 2007
2007	Baxter submits “Addendum to the Ecosorb Pilot Test Technical Memorandum” suggesting use of Ecosorb additive to treating solution, in lieu of misting system above retort doors.	September 2007
2008	Fire breaks out in Carbon Adsorption unit	February 18, 2008
2008	Carbon adsorption unit placed back into service	April 8, 2008
2008	SHINE releases “Cancer Investigation for Three Neighborhoods Surrounding J.H. Baxter & Co. and Other Industrial Sites” final report. The report uses updated cancer data through 2004.	July 21, 2008
2008	LRAPA authorizes trial use of Ecosorb additive to treating solution (August 18, 2008). Maximum estimated releases of Volatile Organic Compounds (VOCs) estimated to be 38 pounds per year.	August 18, 2008

Year	Item	Date
2008	Baxter begins trial use of Ecosorb additive to treating solution	October 13, 2008
2009	Baxter commences regular use of Ecosorb additive in treating solution. Ecosorb was the final aspect required by the Best Work Practice Addendum.	February 10, 2009
2009	LRAPA plant site investigation indicates "plant site odor diminished relative to historical".	May 19, 2009
2009	LRAPA recommences work on draft Baxter permit renewal	June 1, 2009
2010	LRAPA notes in recent months that there is an "increased area by which JHB odor detectable" coupled with an increase in citizen complaints.	January 2010
2010	LRAPA reviews Baxter procedure for unloading creosote from railcar for pumping into facility work tanks.	February - May 2010
2010	LRAPA completes draft of permit renewal and places copy of permit materials on website www.lrapa.org	July 27, 2010
2010	Informational meeting held to discuss draft permit renewal	August 26, 2010
2010	Informational session and formal Public Hearing for draft permit renewal.	September 22, 2010

This table contains the yearly odor complaints received about JH Baxter.

Year	Complaints
2000	15
2001	21
2002	63
2003	437
2004	762
2005	653
2006	226
2007	93
2008	62
2009	112