



November 5, 2021

Don Hoffman
Plant Manager
J.H. Baxter & Co.
3494 Roosevelt Blvd.
Eugene, OR 97402

Re: Source Test Plan for emissions testing of the VPC stack, PCP stack, and permanent total enclosure assessments tentatively scheduled for the week of December 6 or December 13, 2021, at the facility located at 3494 Roosevelt Blvd. in Eugene, Oregon (ACDP No. 200502)

Dear Don Hoffman:

The Lane Regional Air Protection Agency (LRAPA) has completed its review of the Source Test Plan (STP) detailing the use of EPA Methods 23 and 25A for emission measurements of VOC, dioxins/furans, and PAHs from the VPC and PCP stacks, along with EPA Method 204 permanent total enclosure testing. This testing is in accordance with the request letter sent by LRAPA on January 7, 2021, regarding the Cleaner Air Oregon (CAO) emissions inventory. The STP for conducting this emissions testing for J.H. Baxter & Co. in Eugene, Oregon, has been conditionally approved by LRAPA with the following comments.

SOURCE TEST MEETING NOTES

On November 3, 2021, LRAPA met with J.H. Baxter & Co., Bison Engineering, and Maul Foster & Alongi to discuss the details and execution of the upcoming source testing of the VPC and PCP stacks. The following notes detail takeaways from this meeting, along with action items associated with these topics:

1. The facility indicated that it would know the types and quantities of the commodities that will be treated during the time of testing two to three weeks before the test date. LRAPA requests that the type and quantity of commodities to be treated during the testing program, along with the treatment cycle times, be submitted two (2) weeks prior to the finalized testing date.
2. The stack extensions and port installations required for the VPC (STP Section 3.3.1) and the PCP (STP Section 3.3.2) stacks were discussed in the meeting, with clarification that the scope of this pre-testing project is assigned to J.H. Baxter & Co. LRAPA requests that the facility provide weekly updates on the progress of this project and notification

when the extensions are finished, so that LRAPA staff may verify their install before the test.

3. J.H. Baxter & Co. indicated that PID testing was already being conducted on the VPC to verify the VOC destruction efficiency of the control device. It was also discussed that the suspected cause of the early fouling of the VPC was a plugged condensate drop-out that has been cleaned and is now part of the operation and monitoring conducted by the facility. LRAPA requests that weekly updates of the VPC destruction efficiency, as determined by the PID, be submitted for at least three (3) weeks leading up to the finalized testing date.

TESTING PLAN COMMENTS

1. Typically, source tests must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. Due to the complexity of the testing and the overall length of each retort charge, completing only two (2) valid test runs will be considered acceptable for this testing plan.
2. Section 3.4.3 of the STP describes the plan to use smoke, detailed in Section 8.4 of EPA Method 204, as the technique to verify the permanent total enclosure (PTE) conditions of the retort during the "crack-and-vac" cycle. LRAPA requests continued discussions on the possibility of using a differential pressure measurement device to confirm PTE conditions across the retort door opening.
3. As stated in Item 4 of the letter sent to J.H. Baxter & Co. on January 7, 2021, routine PID readings of the VPC must be conducted concurrent with the Method 25A testing to verify this control device monitoring method. LRAPA did not see the PID testing of the VPC noted in the STP, although it should be included in the plan even if this is considered part of the facility's scope during testing.
4. At a minimum, the following operating parameters must be monitored and recorded during the source test. All operating parameters are to be reported and averaged on a per run basis.
 - a. Treatment cycle and treatment step start and end times, and duration times for each treatment step;
 - b. Untreated wood volume in cubic foot per charge (ft³/charge);
 - c. Wood product type treated (e.g., ties, poles, cross-arms, etc.);
 - d. Volume of preservative solution per treatment cycle (gal/cycle);
 - e. Total volume of preservative solution per charge (gal/charge);
 - f. Temperature per treatment cycle; and
 - g. Manifold pressure in VPC unit (during EPA Method 204 testing).

GENERAL TESTING COMMENTS

1. All testing must be conducted in accordance with the ODEQ Source Sampling Manual unless an alternative testing plan is approved in advance by LRAPA.

2. LRAPA must be notified of any changes in the source test plan and/or the specified methods prior to testing. Significant changes not acknowledged by LRAPA could be the basis for invalidating an entire test run or potentially invalidating all test data. Documentation of any deviations must include an evaluation of the impact of the deviation on the test data.
3. Only regular operating staff may adjust the production process during the source performance tests and within two hours prior to the tests. Any operating adjustments made during the source performance tests, which are a result of consultation during the tests with source testing personnel, equipment vendors or consultants, may render the source performance test invalid.
4. It is acceptable to postpone a scheduled test or suspend a test in progress if the discontinuation is due to equipment failure beyond the facility's control, construction delays beyond the facility's control, severe meteorological conditions, and situations that would jeopardize the safety of the testing contractors and/or operators. If the test is underway, every effort should be made to complete the test run. All recoverable test information (process & sample data) must be available for LRAPA review. It is unacceptable to postpone or suspend a test run in progress if it is discontinued because the source is not able to comply with an emission limit or verify an emission factor. Written documentation must be provided to LRAPA explaining the reasons for the postponement or stoppage, and any data collected prior to the stoppage.
5. Method-specific quality assurance/quality control (QA/QC) procedures must be performed to ensure that the data is valid for determining source compliance. Documentation of the procedures and results must be presented in the Source Test Report for review. Omission of this critical information may result in rejection of the data, requiring a retest.
6. A copy of the completed Source Test Audit Report (STAR) Certification Form must accompany the submittal of the Source Test Report. A copy of the STAR Certification Form is available electronically from the LRAPA source test coordinator.
7. To conserve natural resources and to minimize storage space requirements, the test report should be printed on both sides of each page within the document. LRAPA recognizes that this may be infeasible for some supporting documentation (i.e. figures, maps, etc.).

COVID-19 PANDEMIC – SOURCE TEST OBSERVATION PROTOCOLS

To reduce the spread of coronavirus (COVID-19), LRAPA staff will implement the following protocols when observing source tests:

- A face mask will be worn at all times by LRAPA staff while at the facility
- All other facility-required COVID-19 precautionary measures will be observed as well as all other facility-required PPE will be worn (e.g. hard hats or safety vests)
- Whenever possible, activities at the facility will be conducted outside, but when it is necessary to enter inside the building, a minimum of 6 feet of distance will be maintained between individuals
- Hand sanitizer will be used prior to and immediately after the site inspection

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As always, LRAPA asks that the source testers and facility representatives stay in contact with LRAPA should testing plans change so that proper precautions can be taken.

If you have any questions, please contact me at (541) 736-1056 ext. 233 or katie@lrapa.org.

Sincerely,

Kathleen H Eagleson

Katie Eagleson
LRAPA Source Test Coordinator

cc: Scott Thielke
J.H. Baxter & Co.

Zach Harding
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Brian Snuffer Zukas
Maul Foster & Alongi, Inc.