



January 7, 2021

**e-mail**

Georgia Baxter  
President  
J.H. Baxter & Co.  
P.O. Box 5902  
San Mateo, CA 94402

Re: Cleaner Air Oregon Testing and Sampling

Dear Georgia Baxter:

LRAPA has reviewed the responses and supplemental information submitted by J.H. Baxter (JHB) on October 23, 2020 and is requesting the following changes to the Liquid Sampling Plan, with the addition of source testing to measure specific air toxics and support the facility's emission inventory.

The following is the list of changes to the liquid sampling plan and requests for source testing:

1. Add dioxins to the list of analytes at same locations as pentachlorophenol (PCP) and polycyclic aromatic hydrocarbon (PAH) in the Liquid Sampling Plan using EPA Method 8280B, EPA Method 1613B, or an LRAPA-approved method
2. EPA Method 23 to test vapor carbon unit (VCU) outlet for PAHs and dioxins on creosote condition and EPA Method 204 total enclosure testing
3. EPA Method 23 to test PCP Stack for PAHs and dioxins and EPA Method 204
4. EPA Method 25A VCU inlet/outlet for VOC (as propane) concurrent with routine photoionization detector (PID) in lieu of EPA AP-42 emission factors; JHB may propose alternative(s)
5. BAAQMD ST-1B for ammonia scrubber; JHB may propose alternative(s)

LRAPA acknowledges and appreciates the complexity, cost and time needed to satisfy the items outlined in requests 1 through 5 above and is open to considering a flexible timeline for completion.

Please communicate any questions or clarifications regarding the above comments in order to provide timely and complete submittals. LRAPA is available to collaborate with JHB during this timeline to review sequenced sections of the Emission Inventory and underlying preparatory work. **LRAPA is requesting a response to this letter from JHB by January 22, 2021.**

Let me know if you need anything additionally in the matter.

Sincerely,



Max Hueftle  
Permit Section Manager

Cc: Merlyn Hough, LRAPA  
John Morrissey, LRAPA  
Katie Eagleson, LRAPA  
Brian Snuffer Zukas, Maul Foster & Alongi, Inc.  
File