



September 10, 2021

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

Re: Source Test Plan for emissions testing of the ammoniacal copper zinc arsenate (ACZA) scrubber exhaust and permanent total enclosure assessments scheduled for the week of September 13, 2021, at the facility located at 3494 Roosevelt Blvd. in Eugene, Oregon (ACDP No. 200502) – Measurement of ammonia emissions utilizing FTIR and Method 204 permanent total enclosure testing in accordance with the request letter sent by LRAPA on January 7, 2021, regarding the Cleaner Air Oregon (CAO) emissions inventory.

Dear Don Hoffman:

The Source Test Plan (STP) for conducting emissions testing for J.H. Baxter & Co. in Eugene, Oregon, has been reviewed and is approved by Lane Regional Air Protection Agency (LRAPA) with the following comments. A second source test plan is expected to address the remaining testing required by the letter sent by LRAPA on January 7, 2021, for the vapor phase carbon (VPC) unit and the pentachlorophenol (PCP) stack. This second test plan must be submitted to LRAPA at least 15 days prior to the scheduled test date.

TEST PLAN COMMENTS

1. The letter sent by LRAPA to the facility on January 7, 2021, detailed the use of BAAQMD ST-1B, or another approved method, for the evaluation of ammonia emissions from the ACZA scrubber. Section 3.4.1 of the STP proposes the use EPA Method 320 (FTIR) as an alternative method for ammonia emissions measurement. Considering the justifications provided in the additional correspondence with the source testing company and the advantages of real-time ammonia emissions data, LRAPA accepts the proposed alternative method utilizing FTIR.
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 approves of the use of this technique as well as recording the time required for the vacuum pump to provide sufficient pull on the retort to create PTE conditions.

PROCESS COMMENTS

1. 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.

TESTING 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. 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;
 - g. Records of latest water change on scrubber;
 - h. pH sampling of scrubber during the testing; and
 - i. 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. 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.

4. 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.
5. 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.
6. In an attempt 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

1. In an effort 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

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
Bison Engineering, Inc.

Brian Snuffer Zukas
Maul Foster & Alongi, Inc.