Appendix I

Perkins Coie

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April 18, 2005

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

EPA Region X
1200 Sixth Avenue
Seattle, WA 98101
Attn: Continuous Release
MS ECL116

Re: CR-ERNS Number 754198

Dear Madam or Sir:

The enclosed report has been executed on behalf of Threemile Canyon Farms by Marty Myers, General Manager. Please feel free to contact me if you have any questions.

Sincerely,

Tom Lindley

TEL:dat

Enclosure

cc: Marty Myers, General Manager, Threemile Canyon Farms

[39527-0012/PA051080.050]

SECTION I: GENERAL INFORMATION

CR-ERNS Number: 754198

Date of Initial Release: Ongoing

Date of Initial Call to NRC: 3/29/05

Type of Report: Indicate below the type of report you are submitting.

- [x] Initial Written Notification
- [ ] First Anniversary Follow-up Report
- [ ] Written Notification of a Change to Initial Notification
- [ ] Written Notification of a Change to Follow-up Report

Signed Statement: I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

Marty Myers, General Manager

Name and Position

April 18, 2005

Date

Signature

Part A. Facility or Vessel Information

Name of Facility or Vessel: Threemile Canyon Farms

Person in Charge of Facility or Vessel

Name of Person in Charge: Marty Myers

Position: General Manager

Telephone No. (541) 481-9274 Alternate Telephone No. ( )

Facility Address or Vessel Port of Registration

Street 75906 Threemile Road County Umatilla

City Boardman State OR Zip Code 97818

Dun and Bradstreet Number for Facility

Facility/Vessel Location

Latitude Deg _____ Min _____ Sec _____

Longitude Deg _____ Min _____ Sec _____

Vessel LORAN Coordinates

Part B. Population Information

Population Density

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).

_x_ 0 - 50 persons ____ 101 - 500 persons ____ more than 1000 persons

____ 51 - 100 persons ____ 501 - 1000 persons

Sensitive Populations and Ecosystems Within One Mile Radius

Sensitive Populations or Ecosystems (e.g., schools, hospitals, wetlands, wildlife preserves, etc.)	Distance and direction from facility
No sensitive populations or ecosystems within 1 mile radius of dairies.	

SECTION II: SOURCE INFORMATION

CR-ERNS Number: 754198

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Threemile Canyon Farms

1. Indicate whether the release from this source is either:

continuous without interruption X **OR** routine, anticipated, intermittent _____.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*

Ammonia is emitted as an air discharge from all of the dairy cow waste generation, handling, storage, and processing operations.

3. Identify below how you established the pattern of release and calculated release estimates.

____ Past release data ____ Knowledge of the facility/vessel's operations and release history ____ Engineering estimate

____ AP-42 ____ Best professional judgment x Other (explain)

Ammonia emission factors were taken from published studies and scientific literature.

** Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.*

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 754198

Name of Source: Threemile Canyon Farms

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ____ (stack ____ or area X) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

- If identified source is a **stack**, indicate stack height: ____ feet or meters; **OR**
- If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: very large dairy farm & agriculture facilities, ~92,000 acres, ~100 sq.mi.

☒ **SURFACE WATER** ____ (stream ____, lake ____, or other _____)

- If the release affects any **surface water body**, give the name of the water body.

  _____

- If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

  stream order: ____ or average flow rate: ____ cubic feet/second; **OR**

- If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

  surface area of lake: ____ acres and average depth of lake: ____ meters.

☒ **SOIL OR GROUND WATER** ____

If the release is on or under ground, indicate the distance to the closest water well.

_____

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

- For a stack release to air, provide the following information, if available:

  Inside diameter _____ feet or meters
  Gas Exit Velocity _____ feet/second or meters/second
  Gas Temperature _____ degrees Fahrenheit, Kelvin, or Celsius

- For a release to surface water, provide the following information, if available:

  Average Velocity of Surface Water _____ feet/second

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 754198

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Threemile Canyon Farms

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)* Upper Bound	Normal Range (in lbs. or kg per day)* Lower Bound	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
Ammonia	7664-41-7	15,500 lb/day	4600 lb/day	365	same as current	All 12 months

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)* Upper Bound	Normal Range of Components (in lbs. or kg per day)* Lower Bound	Normal Range of Mixture (in lbs. or kg per day)* Upper Bound	Normal Range of Mixture (in lbs. or kg per day)* Lower Bound	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release

* *Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 754198

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Ammonia

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg, or Ci)
Current Operating Level: 52,300 dairy cows	15,500 lb/day of ammonia
Permitted Level: 90,667 dairy cows	27,000 lb/day of ammonia

TOTAL - SSI trigger for this hazardous substance release* : 27,000 lb/day of ammonia

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

Title 40--Protection of Environment

(This index contains parts 300 to 399)

CHAPTER I--ENVIRONMENTAL PROTECTION AGENCY (CONTINUED)

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	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) claims procedures
	Reimbursement to local governments for emergency response to hazardous substance releases
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