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March 9, 2011

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U.S. EPA-W09

U.S. Environmental Protection Agency
Region 10
Washington Operations Office
300 Desmond Drive SE Suite 102
Lacey WA 98503

Attention: Suzanne Powers

RE: Our Client: Tree Top, Inc.
Matter: Submission of Supplemental Environmental Project ("SEP") Completion Report

Dear Ms. Powers:

On behalf of our client, Tree Top, Inc., we are submitting this SEP Completion Report in accordance with Section 4.16 of the Consent Agreement and Final Order ("CAFO") filed in this matter (Docket No. EPCRA-10-2010-0194). Tree Top has completed its SEP consistent with the CAFO, and has spent \$82,751.67, fully mitigating the agreed penalty.

Project Description

Installation and testing of an engineered computer-controlled system for Tree Top's refrigeration system at its Selah Plant, including installation of additional ammonia detectors and automatic shut-down features as described in Appendix A to the CAFO.

Implementation of Project

Tree Top initiated the design and purchase of components for its SEP project in fall of 2010. Installation and testing was completed in February of 2011, and the system is currently in operation.

Tree Top installed an engineered computer-controlled system that includes ammonia detectors in the relief piping of the ammonia system and critical system parameter interlocks. The purpose of the computer-controlled system is to provide better control and improved monitoring of the ammonia refrigeration system at Tree Top's main plant, while having immediate detection of a release incident due to an upset condition. The system is programmed to shut down upon reaching high pressure levels on both the suction and discharge side of the ammonia compression system, as well as ammonia level detection in conjunction with high pressure conditions. Critical process parameters are logged to a historical database and stored where system dynamics and operation can be reviewed by plant personnel.

The glycol subsystem of the refrigeration system was modified to prevent high temperature glycol from entering the refrigeration system by utilizing temperature and system starting interlocks. This prevents extreme temperatures caused by glycol upsets from causing high ammonia pressures in the suction side of the refrigeration system. Upsets from increased temperature and high ammonia pressures are avoided because the system is designed to shut down the glycol pumps and prevent the system from starting if unsafe temperatures exist.

The local compressor controls for one of the compressors also was replaced to allow the system to be controlled by the new engineered control system, as well as having system operating parameters logged by the historical database. The other, newer compressors did not need local upgrades because they already supported the necessary communication and operational functions needed by the new engineered control system.

The new system described above was tested under the supervision of company engineers, and plant operators and maintenance personnel were trained on its operation. The upgraded system is designed to prevent the types of releases described in the CAFO, and will provide improved early detection in the unlikely event of a release from the system. The system is currently and continuously in operation at Tree Top's Selah Plant.

Documented Project Costs

Total project costs expended by the company to complete the SEP were \$82,751.67, as summarized in the Project Cost Summary attached to this letter as **Exhibit A**. This amount fully mitigates the remaining amount of the penalty described in Section 4.14 of the CAFO, which only required Tree Top to expend the sum of \$81,362. Documentation for SEP costs actually incurred, including copies of all purchase orders and invoices for the equipment and services incurred by Tree Top to implement the SEP, also are attached as **Exhibit A**.

Operational Issues and Environmental Benefits from Project

No operational problems were encountered during implementation of the SEP. Tree Top has completed the SEP substantially in accordance with Appendix A to the CAFO, as summarized and supplemented in this Completion Report.

Tree Top submits that all environmental and public health benefits described in Appendix A to the CAFO have been achieved. Installation of the new equipment and systems have provided better control and improved monitoring of Tree Top's ammonia refrigeration system, while having the ability to immediately detect a release incident due to an upset condition. In the unlikely event of a release, Plant personnel would be alerted immediately, substantially reducing response times and thereby protecting Plant personnel, the public and the environment. In addition, the engineered computer-controlled system also is designed to detect and shut down upon reaching high temperature threshold levels which will prevent ammonia pressure and temperature conditions in the system from reaching an upset level.

In summary, the system controls will make an ammonia release from the system much less likely, and in the unlikely event that one were to occur, detection and system shut down would be immediate.

Yours very truly,

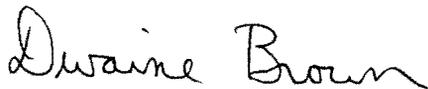
VELIKANJE HALVERSON P.C.

Mark E. Fickes

Certification

I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

TREE TOP, INC., a Washington corporation



By: Dwaine Brown, VP Finance and CFO

Cc: Stephanie Mairs
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