Oregon
Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
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October 22, 2021

Andrew Willis
Covanta Marion, Inc.
4850 Brooklake Road NE
Brooks, OR 97305

Mr. Willis,

DEQ has reviewed the revised source test plan submitted by Covanta Marion, Inc. (CMI) on September 13, 2021. Based on this review, DEQ requires that the following issues be addressed in a revised source test plan. A revised source test plan is due at least 30 days prior to the planned testing, which is required to be completed by December 31, 2021.

General Comments

1. Provide proposed in-stack detection limits for all pollutants. Include proposed minimum sample volumes for all test methods and lab analytical detection limits.
2. DEQ will require that data used for CAO risk assessment purposes result from source tests conducted under typical worst-case conditions that generate the highest emissions. Consistent with DEQ's Source Sampling Manual, it will be imperative to describe in detail the proposed process conditions that generate such "worst-case conditions". Because the facility accepts and burns a wide variety of materials (municipal solid waste, regulated medical waste, industrial solid waste, special waste, liquid), multiple source testing events may be required for DEQ to understand the facility's hazardous air pollutant emissions and approve a risk assessment. Add a section to the Source Test Plan to discuss why the proposed source testing conditions address testing during worst-case conditions for each of the analyte groups:
    a. PCDD/Fs
    b. PCBs
    c. PAHs
    d. VOCs
    e. Metals
    f. Hydrogen chloride, halides, and halogens
    g. Formaldehyde and other aldehydes
    h. Ammonia
    i. Chlorophenols
    j. Chlorobenzenes

Specific Revision Comments

1. Please revise to include contact information for the source testing company and analytical laboratories.
2. Page 6, Section 2.3. Please revise to include specific operating conditions for the proposed testing conditions including the following:
    a. High Fire
        i. Minimum steam load (Klbs/hr)
        ii. Minimum rate of regulated medical waste (tons/hr)
        iii. Minimum rate of liquid direct injection (gal/hr)

iv. If additional special wastes will be burned if available during the test.

b. Low Fire
   i. Maximum steam load (Klbs/hr)
   ii. Minimum rate of regulated medical waste (tons/hr)
   iii. Minimum rate of liquid direct injection (gal/hr)
   iv. If additional special wastes will be burned if available during the test.

3. Page 33, Section 8.1. Revise to include the additional operational information that will be recorded for each unit.
   a. Regulated Medical Waste
      i. Clarification of the different types of bins (e.g., blue vs. gray) delivered by customers and how those may or may not relate to the different types of regulated medical waste received (e.g., trace chemotherapy waste, pharmaceutical waste, pathological waste).
   b. Liquid Direct Injection
      i. Analyses of the liquid injected during the testing
         1. Chloride – Method 300.0
         2. Trace Metals – Method 6020A
         3. Total Halogenated Organics – Method 9020B
   c. Industrial Solid Waste
      i. Waste description
      ii. Total tons received and combusted
   d. Special Waste (if any)
      i. Waste description
      ii. Total tons received and combusted

DEQ recognizes the unique challenges this testing pose to your facility and operations, and the results will provide valuable information for completing the risk assessment. If you have any questions or concerns, please contact me directly at (503) 229-5534 or thomas.rhodes@deq.state.or.us. Thank you for your continued efforts with this process.

Sincerely,

Thomas Rhodes

Thomas Rhodes
DEQ CAO Source Test Coordinator

Cc: Jeffery Hahn, Covanta Marion, Inc.
Kirk Little, Covanta Marion, Inc.
Keith Johnson, DEQ
Kenzie Billings, DEQ
Claudia Davis, DEQ
Michael Eisele, DEQ
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