



Oregon

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Chemical Waste Management of the Northwest, Inc.
18177 Cedar Springs Ln.
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Mr. Denson,

We have reviewed the source test plan submitted by Chemical Waste Management of the Northwest, Inc. (CWM) on November 25, 2019. Based on our review of the source test plan, DEQ requires that the following issues be addressed in a revised source test plan. A revised source test plan is due at least 45 days prior to the planned testing, which should occur no later than June 29, 2020.

General Comments

Please review Appendix A of the Oregon Source Sampling Manual that has the source test plan requirements: page A-1 of the Source Sampling Manual lists multiple statements that must be included in the source test plan; table A-1 details additional test plan requirements as applicable to the source test. Each test method proposed is required to include the quantifiable or detectable limits for each pollutant. Minimum sample volumes must be proposed for all applicable test methods. When proposing minimum sample volumes for the test methods, review Section 2.7 of the Oregon Source Sampling Manual.

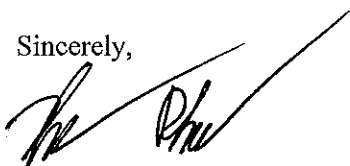
Specific Comments

1. Page 1. Please revise the ODEQ permit number listed on the cover page to the correct number for this facility.
2. Page 3. EPA Method 306 is only applicable to chromium electroplating and anodizing sources. SW-846 Method 0061 must be used to test for hexavalent chromium.
3. Page 3. EPA Method 25C is only applicable to Subpart W WW facilities. Another test method such as EPA Method 25A must be selected for determining Total VOC at the inlet locations.
4. Page 3. In consultation with EPA, EPA Method TO-15 is an ambient test method and is not applicable to stationary sources. EPA Method 18 is a more appropriate test method. TO-15 may be used as a screening tool to evaluate which air toxics may be present and approximate concentrations.
5. Page 3. A 1-hour minimum run time for Method 29 is not likely to achieve the sample volume needed for adequate in-stack detection limits (ISDLs). The ISDL is a function of the analytical detection limit, quantity of sample matrix and the volume of stack gas sampled. Provide a detailed analysis of the proposed ISDLs and subsequent sample run times.
6. Page 4. A 1-hour minimum run time for hexavalent chromium testing is not likely to achieve the sample volume needed for adequate ISDLs. The ISDL is a function of the analytical detection limit, quantity of sample matrix and the volume of stack gas sampled. Provide a detailed analysis of the proposed ISDLs and subsequent sample run times.
7. Page 4. The ducts for the inlet waste gas streams feeding the TOU are less than 12" so EPA Method 1A should be specified. If a standard pitot will be used to measure flow, EPA Method 2C should be specified.
8. Page 6. Since EPA Methods 5 and 26A are combined, the probe/filter assembly must be maintained at temperatures between 248F and 273F. The test plan description for the method states that there will be two impingers containing an alkaline absorbing solution but does not

- specify that Cl₂ and Br₂ may be analyzed from these solutions. Please include these species in your analysis. The method description must also include the proposed minimum sample volume and a discussion on the ISDLs.
9. Page 6. The Method 29 description contains past tense references were and was. Hg, Cd, and Pb are the metals listed to be analyzed despite the metals list being As, Cd, Cr, Pb, Mg, Hg, and Ni earlier in the test plan. Analysis must be completed for the entire Method 29 list of metals plus aluminum (Al) and vanadium (V). The method description must also include the proposed minimum sample volume, the analytical detection limits and the associated ISDLs.
 10. Page 7. The hexavalent chromium testing description states, "Sampling duration is currently based on 60 minutes per scrubber based on previous testing." Since ORU2 has not been previously tested and does not have a scrubber, this appears to be an artifact of some other test plan. Since Method 0061 must be used for hexavalent chromium testing, the method description should be updated accordingly. The method description must also include the proposed minimum sample volume, the analytical detection limits and the associated ISDLs.
 11. Page 7. EPA Method 23 as currently published does not include PAHs. However, it is common to modify the method to include PAHs. The test plan must clearly state that you are using a modified Method 23 and the modified procedures must be listed. The method description must also include the proposed minimum sample volume, the analytical detection limits and the associated ISDLs.
 12. Page 8. The test plan does not include method discussions for all of the proposed test methods, such as the NMOC and speciated VOC methods.
 13. Page 9. The test plan must include a more detailed discussion of the feed material that will be used during the test – provide documentation of the feed materials processed during the previous 12 months in this unit so that DEQ may determine 'representativeness' of the sampling event.
 14. Page 9. The test plan must include a more detailed description of the process data that will be collected during every test run. The proposed operating rate is a large range. Be advised that imposed process limitations may result from operating at atypical rates during the source test.
 15. Page 9. The test plan states, "All Labs shall be ODEQ approved. Labs yet to be determined." Labs will need to be listed before ODEQ can approve them.
 16. Page 9. The test plan must have a defined deadline as to when the final report will be submitted. Oregon DEQ believes that the "within 4 weeks of the test completion" stated in the test plan or the thirty (30) days as stated in the Source Sampling Manual will not be sufficient due to the proposed scope of source testing. Oregon DEQ will allow sixty (60) days from the completion of the source test for the submittal of the final report.
 17. Page 10. Update the proposed timeline with the correct test methods and revised sample durations. The inlet NMOC testing must occur simultaneously with the outlet THC testing if Destructive Removal Efficiency will be calculated.

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. Thank you for your continued efforts with this process.

Sincerely,



Thomas Rhodes
DEQ CAO Source Test Coordinator

Cc: Tom Wood, Stoel-Rives
Keith Johnson, DEQ

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