



# Oregon

Kate Brown, Governor

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

As part of DEQ's continued review of the Emissions Inventory and supporting materials submitted as part of the Cleaner Air Oregon (CAO) process for your facility, DEQ and Chemical Waste Management of the Northwest, Inc. (CWM) held a meeting on May 14, 2020 to discuss items related to the proposed calculation methodologies and data contained in the supporting documents.

This letter is a follow-up to that meeting, outlining the information CWM agreed to provide to DEQ in order to support the technical review of the Emissions Inventory – these materials are as follows:

1. A number of waste profiles provided in the supporting documentation had no associated Toxic Air Contaminants (TACs). CWM will review the provided list (see Appendix) for profiles related to the Organics Recovery Unit-2 (ORU-2) to:
  - a. Provide clarification if these profiles were analyzed by either a Toxicity Characteristic Leaching Procedure (TCLP) or a Total Constituent Analysis.
  - b. Indicate which zero values are based on Non-Detect (ND) analytical values.
  - c. Provide revisions to profiles as needed.
2. In regards to the emission estimates from the proposed Thermal Desorption Unit-1 (TDU-1), CWM clarified that emissions will be estimated by the following:
  - a. Average values of the proposed Portland Harbor Superfund Site sediments will be used to estimate the feedstock and CWM will provide the supporting material for review.
  - b. Source testing data from a similar unit at a facility in Louisiana and CWM will provide the following upon completion of the testing:
    - i. A timeline for completion and submittal of the final testing report.
    - ii. A summary of the emissions unit being tested and a comparison to the proposed operations at the CWM facility – including throughput rates and operating parameters.
    - iii. Testing methods and pollutants analyzed.
3. CWM will provide the references and justifications of the proposed estimation methodologies for TAC emissions based on the Environmental Protection Agency (EPA) Superfund National Technical Guidance Study Series (1992); specifically addressing the selection criteria and justification used when the reference provides for a range of parameter values associated with the emissions calculations.

Please submit this information by no later than 30 days from submittal of this letter. DEQ appreciates the continued effort on behalf of CWM to provide information in order to complete the review of the CAO emissions inventory for this facility. If you have any questions or concerns please contact me directly.

Thank you for your continued efforts with this process.

**<Signed Electronically>**

J.R. Giska  
DEQ CAO Program Engineer

Cc: Tom Wood, Stoel-Rives  
Keith Johnson, DEQ  
Mark Bailey, DEQ  
Doug Welch, DEQ  
File

## **APPENDIX:**

ORU-2 waste profiles to review.

<b><u>WASTE PROFILE</u></b>	<b><u>TONS REPORTED</u></b>
OR338095	9.79
OR338219	9.93
OR338340	1376.02
OR338415	30.82
OR338508	3.49
OR339132	17.72
OR339730	5.09
OR337485	25.81
OR337216	51.50
OR335132	248.62
OR334205	0.22
OR334440	12.33
OR333208	0.22
OR333231	3.75
OR333325	0.40
OR332271	0.66
OR329607	7.80
OR328439	57.24
OR328502	0.49
OR328576	0.51
AK7981	168.72
C15065	28.14
E39486	61.83
OR302395	2807.19
OR322678	67.99