



Chemical Waste Management of the Northwest
17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2030 phone
(541) 454-3247 fax

May 31, 2019

VIA E-MAIL ONLY

J.R. Giska
(giska.jonathan@deq.state.or.us)
Oregon Department of Environmental
Quality
700 NE Multnomah St.
Suite 600
Portland, OR 97232-4100

RE: Cleaner Air Oregon Emissions Inventory Submittal.

Dear Mr. Giska:

On March 4, 2019, Chemical Waste Management of the Northwest, Inc. received a letter from Keith Johnson providing us written notice pursuant to OAR 340-245-0050 that our Arlington facility was being called into the Cleaner Air Oregon (CAO) risk assessment process. OAR 340-245-0030(1)(a)(A) specifies that an emissions inventory must be submitted to DEQ no later than 90 days after the DEQ notice date and OAR 340-245-0040(1) specifies that the inventory must be submitted electronically. The email with which this letter is included constitutes our timely CAO emissions inventory submittal.

In preparing this inventory we employed best engineering knowledge to generate an estimate of the 2018 emissions of the toxics listed in OAR 340-245-8020, Table 2. Due to the limits of available information and the limited time available, certain assumptions were made in generating these estimates. Where appropriate, established emission factors were employed and judgments made as to process operations, operating schedules and material constituents. The time provided to prepare the inventory was limited and we have endeavored to do the best job possible while meeting the rule deadline. However, we reserve the option to revise these estimates as additional information becomes available.

We have not included an estimated potential to emit for the facility due to the unique nature of our variable waste streams. At this time we anticipate demonstrating risk based on our 2018 actual emissions estimate and proposing a risk limit based on the factors stated in OAR 340-245-0110(2)(b). Again, this approach is subject to change as additional information becomes available.

Included with this transmittal is a Form ED601 identifying all of our categorically insignificant activities. These constitute our Exempt TEUs.

May 31, 2019

Should you have any questions or concerns, please feel free to contact me by phone at (602) 757-3352 or by email at jdenson@wm.com.

Sincerely,

A handwritten signature in black ink, consisting of a large, loopy 'J' followed by a horizontal line and a vertical stroke that crosses the line.

James L. Denson Jr.
PNW/BC Area Environmental Protection Manager

CC;

Tom Wood, Stoel Rives by E-mail
Facility Operating Record

Attachment

Form AQ405cao, Excel electronic file
Form ED601, pdf electronic file