



# 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,

We have reviewed the revised source test plan and response letter submitted by Chemical Waste Management of the Northwest, Inc. (CWM) on June 26, 2020 as required by the Cleaner Air Oregon (CAO) process. Based on our review the source test plan is approved with the following comments.

### ***General Comments***

DEQ approves the requested method deviations to use two piece quartz probes instead of one piece probes for the Method 5/26A, 23 and 29 testing. The source test report shall include an evaluation of the impact of this deviation on the test data.

All further modifications and/or alternatives to testing methods or procedures that are performed to satisfy DEQ testing requirements must receive approval from DEQ prior to their use in the field. Changes not acknowledged by the DEQ could be basis for invalidating an entire test run and potentially the entire testing program.

### ***Test Method Specific Comments***

1. EPA Method 26A
  - a. Method 26A sampling shall include analysis for all of the hydrogen halides (HCl, HBr, and HF) and halogens (Cl<sub>2</sub> and Br<sub>2</sub>) listed as analytes in the reference method. This request is for a complete analysis of the samples that will be collected during this sampling event. All of these compounds are in the OAR 340-245-8020 Table 2 Toxic Air Contaminant Report List. HCl, HF and Cl<sub>2</sub> have RBCs listed in OAR 340-245-8040 Table 4. Additionally, CWM has not provided emissions data or detailed feedstock analysis for ORU-2 indicating these Toxic Air Contaminants (TACs) are not emitted from this Toxic Emission Unit (TEU). Inclusion of these additional compounds is required to establish a robust and accurate emissions inventory.
2. EPA Method 2
  - a. DEQ is aware of the challenges in obtaining analytical data for all of the PAH and PAH derivatives listed in OAR 340-245-8020 Table 2. Every effort should be made to get analytical data on these compounds in order to complete an accurate emissions inventory for the facility. Documentation shall be provided for the PAH species for which laboratory analysis and reporting is not available.
  - b. Due to the toxicity and extremely low Risk Based Concentrations (RBCs) of some the compounds sampled with this method, the minimum sample volume shall be at least 120 dscf in order for DEQ to consider allowing the use of zero for non-detects in the risk analysis. DEQ will not pre-approve the use of zero for non-detects in the risk analysis without having reviewed the source test data.
3. EPA Method 306 or SW846 Method 0061
  - a. DEQ notes that CWM is opting not to do testing to determine hexavalent chromium emissions. CWM is determining total chromium emissions using EPA Method 29.

On November 27, 2019 DEQ approved CWM's timeline to have source testing completed by July 3, 2020. DEQ has reviewed and requested two revisions to previous source testing plans on March 9 and June 5, 2020. Because CWM has not submitted a formal extension request in regards to the anticipated delays in testing, DEQ requests source testing to be completed no later than **August 24, 2020**.

DEQ recognizes the unique challenges this testing poses to your facility and appreciates the continued assistance with this process. The results will provide valuable information for completing the CAO emissions inventory. If you have any questions or concerns please contact me directly. Thank you for your continued efforts with this process.

Sincerely,

*Thomas Rhodes*

Thomas Rhodes  
DEQ CAO Source Test Coordinator

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