



Chemical Waste Management of the Northwest  
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July 24, 2020

**VIA U.S. MAIL ONLY**

Mr. Thomas Rhodes, Source Test Coordinator  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232

**Subject: Chemical Waste Management of the Northwest, Inc., (CWMNW) Third Source Test Plan Response**

Dear Mr. Rhodes;

CWMNW, SCS Engineers (SCS), and Blue Sky Environmental (Blue Sky) have reviewed the Oregon Department of Environmental Quality (ODEQ or Department) Source Test Plan (STP) comment letter, dated July 10th, 2020. We appreciate the Department's cooperation in working together on this complex project and approving of the proposed alternatives. Attached is an updated source testing plan incorporating the approved changes and alternatives.

Test Method Specific Comments

1. EPA Method 26A (M26A)

- a. Test for All Hydrogen Halides including Hydrogen Bromine (HBr) and Hydrogen Fluoride (HF): We have added the testing for the additional Halides, HBr and HF, and the halogens Cl<sub>2</sub> & Br<sub>2</sub>, and we have included these procedures into the revised STP attached.
- b. M26A Specifies Quartz Glass and One-Piece Nozzle and Probes: CWMNW appreciates the Department's approval of the use of the two-piece probe for this method. During the test, we will evaluate the two-piece probe and report these observations in the final test report. We will evaluate aspects of the probe and fittings connections, the overall integrity as well as the resulting data.
- c. ORU Feed Stock Toxic Air Contaminant Data: As discussed in the last response CWMNW has resampled and tested the Organic Recovery Unit (ORU) waste for metals, volatile organic compounds (VOCs) and semi-volatile compounds, and plan to update the storage building emissions in our Emission Inventory (EI) accordingly. Once the results from the ORU Thermal Oxidizer Unit (TOU) source testing are available, we will incorporate these into the EI, and provide that revision to the Department.

EPA Method 23 (M23)

- d. Testing for All PAHs and Derivatives in OAR 340-245-8020, Table 2: CWNNW appreciates the Department's approval of the partial list. We have included the laboratories complete compound list in our STP. For your reference, we have also included a table show showing which OAR 304-245-8020 compounds the laboratory can analyze for and those they cannot.
- e. ODEQ considers 120 dscf sample volume to be the minimum: We have increased the source test run time to 4 hours to attain the 120 dscf. The STP has been updated to include the 4-hour run time and the attainment of the 120dscf.

2. EPA Method 23 (M23) and SW846 Method 0061

- a. Not Testing for Hexavalent Chromium and Allowing an Alternative Calculation: We appreciate the Department's approval of this alternative.

Based upon approval of the STP, CWMNW has scheduled the testing for August 18 – 20, 2020. Testing is expected to start at 9am each day and will begin on August 19<sup>th</sup>. As discussed CWMNW can only allow pre-approved and scheduled visitors that have evidence of the following to enter the site;

- Evidence of current 24 or 40 hour HAZWOPER training
- Respirator and evidence of a fit test
- We can supply the Tyvek suit and any gloves you may need
- Steel toe boots
- Hard hat
- Safety glasses
- Completion of site-specific web-based safety and environmental training
- Completion if the site-specific face to face safety and emergency response class that will be given the day of the testing
- Daily completion if the attached COVID -19 health check attached.

Visitors must check in at the lower Chem Waste office and be escorted into the facility. Please make sure you are prepared for the weather as during this time period Arlington temperatures can reach above 100deg F and the winds are significant during the daytime hours. CWMNW will have a small tent structure for visitors and technicians to access shade and hydration. Personal vehicles are not allowed on site, and there are no air-conditioned areas other than the break room accessible to visitors. The facility is in an area without cellular service, should you need it the main number at the site is 541-454-2030.

Please let me know if you have any questions, I can be contacted by phone at 602-757-3352 or at [jdenson@wm.com](mailto:jdenson@wm.com).

Sincerely,



James L. Denson Jr  
PNW/BC Environmental Protection