



# Oregon

Kate Brown, Governor

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August 8, 2019

Chemical Waste Management of the Northwest, Inc.  
18177 Cedar Springs Ln.  
Arlington, OR 97812

Mr. Denson,

DEQ appreciates the submittal of the Cleaner Air Oregon Toxic Air Contaminants Emissions Inventory Form AQ405CAO for the Chemical Waste Management facility in Arlington, OR. DEQ received your submittal on May 31, 2019 and has completed an initial review.

Based on our initial review, DEQ has identified several deficiencies in your May 31, 2019 submittal. According to OAR 340-245-0030(2), DEQ is requesting you submit additional information, corrections and updates to the Emissions Inventory by no later than December 6, 2019.

General Comments:

Due to the omission of process emissions related to "Organic Recovery Unit 2", DEQ considers this submittal to be incomplete.

In order to meet the requirements in OAR 340-245-0030(3), DEQ requires Chemical Waste Management to perform source testing on the "Organic Recovery Unit 2" and furnish DEQ with the results of this testing, along with the revised Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan (if applicable) 120 days from the date of this letter pursuant to ORS 468A.070 & OAR 340-212-0120. This request is consistent with CWM's stated intentions to perform this sampling.

DEQ requires submittal of a Source Sample Plan for review 30 days prior to the actual test date as outlined in the DEQ Source Sampling Manual. At a minimum, DEQ requires sampling methods be performed that provide emissions data for the following TACs:

- Metals: arsenic [As], cadmium [Cd], chromium [Cr], lead [Pb], manganese [Mn] mercury [Hg], nickel [Ni] (e.g. EPA Method 29)
- Halogenated gases: hydrogen chloride [HCl], hydrogen fluoride [HF], hydrogen bromide [HBr] (e.g. EPA Method 26A)
- Polycyclic aromatic hydrocarbons and dioxins/furans (e.g. EPA Method 23)
- Volatile organic compounds and specified toxic organic compounds: sample both inlet and outlet of the thermal oxidizer to obtain destruction/removal efficiencies (e.g. EPA Method 25A and EPA Method TO-15)

Specific Comments:

Based upon the initial review, DEQ requires additional information on the following items pursuant to [OAR 340-245-0030(2)]:

1. DEQ requests methodologies used to calculate the emission factors, based on engineering estimates, in order to substantiate the emissions for all associated TACs reported in this submittal.

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2. DEQ requests all analytical data used in support of recent sampling and analysis of all waste material profiles processed in Organic Recovery Unit 2. This data was collected in addition to the Toxicity Characteristic Leachate Procedure (TCLP) analysis normally required under the Hazardous Waste permit. DEQ also requests the total annual amounts processed of each type of material analyzed. DEQ requests the data be provided in electronic spreadsheet format if possible. DEQ is not requesting information relative to waste generators associated with waste profiles.

Please note the following if you think some or all of this information should be treated as "Confidential Business Information":

In order for DEQ to exempt Emissions Inventory submittal data not already publicly available, DEQ must obtain the requested emissions information along with verification of this claim in accordance with OAR 340-214-0130, specifically sub-sections 2(b) and 3(a-e) as follows:

(2) If an owner or operator claims that any writing, as that term is defined in ORS 192.410, is confidential or otherwise exempt from disclosure, in whole or in part, the owner or operator must comply with the following procedures:

(a) The writing must be clearly marked with a request for exemption from disclosure. For a multi-page writing, each page must be so marked.

(b) The owner or operator must state the specific statutory provision under which it claims exemption from disclosure and explain why the writing meets the requirements of that provision.

(c) For writings that contain both exempt and non-exempt material, the proposed exempt material must be clearly distinguishable from the non-exempt material. If possible, the exempt material should be arranged so that it is placed on separate pages from the non-exempt material.

(3) For a writing to be considered exempt from disclosure as a "trade secret," it must meet all of the following criteria:

(a) The information cannot be patented;

(b) It must be known only to a limited number of individuals within a commercial concern who have made efforts to maintain the secrecy of the information;

(c) It must be information that derives actual or potential economic value from not being disclosed to other persons; and

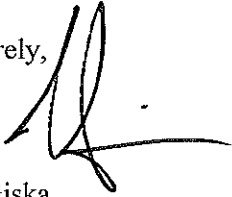
(d) It must give its users the chance to obtain a business advantage over competitors not having the information.

(e) It must not be emissions data.

Please communicate any questions or clarifications regarding the above comments proactively in order to provide a timely Source Sample Plan 30 days prior to the actual testing date and timely, revised Emissions Inventory by December 6, 2019. DEQ remains available during this timeframe to discuss the submittal with you and answer any questions you may have. Failure to provide additional information or corrections required by DEQ by this date may result in a violation of OAR 340-245-0030(1) and OAR 340-245-0040(1).

Once we have received the requested information, we will complete our review of the Emissions Inventory. If you have any questions or need further clarification, please contact me directly at (503.229.5178, [giska.jonathan@deq.state.or.us](mailto:giska.jonathan@deq.state.or.us)). We look forward to your continued assistance with this process.

Sincerely,

A handwritten signature in black ink, appearing to be 'J.R. Giska', with a long horizontal stroke extending to the right.

J.R. Giska  
DEQ CAO Program Engineer

Cc: Keith Johnson, DEQ  
Kenzie Billings, DEQ  
Mark Bailey, DEQ  
Doug Welch, DEQ  
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