



Chemical Waste Management of the Northwest  
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December 6, 2019

**VIA E-MAIL ONLY**

Mr. J.R. Giska  
([giska.jonathan@deq.state.or.us](mailto: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 (CAO) Draft Emissions Methods and Inventory Calculation Submittal.**

Dear Mr. Giska:

This Review Draft Emissions Methods Report along with the accompanying electronic Draft Emissions Calculation Spreadsheet is being submitted in compliance with the December 6th, 2019 agency approved CWMNW CAO project task schedule. The email with which this letter is included constitutes our timely submission of the “Revised Emission Inventory Less ORU-2 TOU Emissions” general timeline subtask. Each document is intended as an Agency review draft to afford the Agency time for questions or comments to CWMNW emissions calculation methods for each emissions unit (EU).

The wastes accepted and processed at the facility are characterized by the generator in compliance with 40 CFR part 261, RCRA hazardous waste regulations and the site-specific RCRA Part B permit requirements. Generator’s characterization of wastes includes profiling all potential waste streams based upon its individual chemical and physical characteristics as required by 40CFR part 261, comparing the generator characterized waste to the contaminants for that waste to the RCRA land disposal restrictions contained in 40 CFR Part 268.40. 40 CFR Part 268.40 establishes the list of contaminants required for analysis for each waste type.

Emissions calculated in the Draft Emission Spreadsheet were developed using Maximum Expected Throughput (MET) based on facility waste acceptance expectations at the current time, multiplied by the average of the compound concentration, however actual throughput for any of the above EUs may be higher or lower than the MET used in these calculations. CWMNW intends that the facility wide throughput will be maintained such that calculated facility wide emissions will be below the CAO risk action levels.

In order to determine compound emissions for the various processes at the facility, CWMNW and our consultants have completed a comprehensive review of the available waste profiles and laboratory data for approximately 5,000 individual profiles. These profiles were sorted electronically into groups corresponding to the waste processing emission. Profiles and laboratory reports were reviewed from 2017 and 2018 to allow for the estimation of the average contaminate concentrations in each sub-category of wastes treated at the facility. The laboratory reports associated with each profile were reviewed individually to identify CAO

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compounds, then the average compound concentrations were calculated using the accepted waste mass. The average concentrations of each compound were multiplied by the MET throughput to calculate the annual and maximum 24-hour mass emissions rates. For maximum daily emissions, maximum daily throughput information was used in the calculation. In addition, for the stabilization and solidification processes, safety data sheets (SDS) for reagent products were reviewed to identify CAO compounds within those products. The concentrations of compounds and the weight throughput was used to determine the compound emission rates for each EU used in these processes.

Due to the complex nature of hazardous waste treatment and disposal processes, best engineering judgement, appropriate EPA methodologies, as well as standard engineering practices were used in the CWMNW emissions inventory to estimate annual and daily emissions from individual EUs. These estimates are based on MET, the average concentrations of compounds in waste from the waste profiles, and conservative assumptions regarding volatilization rates.

At this time, we anticipate demonstrating facility risk based on the a completed final emissions inventory to be developed once the TOU-1 source test has been completed, which is scheduled to occur on or before September 18<sup>th</sup>, 2020.

CWMNW would like to respectfully request that the enclosed documents be treated as preliminary and not for dissemination to the general public or other agencies until such time the Agency has agreed with the methods and approaches contained in this document and CWMNW has provided a final interim inventory based on the outcome of our discussions.

Once the CAO team has reviewed this submittal, we would like to offer to setup a meeting to review the contents of this submission and discuss any concerns the Agency may have. please feel free to contact me by phone at (602) 757-3352 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Denson Jr.", with a large, sweeping loop at the end.

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

CC;

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

Attachment

Draft CWMNW Emission Methods Report  
Draft CWMNW Emission Report