



# Oregon

Kate Brown, Governor

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December 3, 2021

Andrew Willis  
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4850 Brooklake Road NE  
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Mr. Willis,

DEQ has reviewed the revised source test plan submitted by Covanta Marion, Inc. (CMI) on November 8, 2021. Based on this review, DEQ approves the source test plan with the following comments.

### ***General Comments***

1. DEQ will require that data used for CAO risk assessment purposes result from source tests conducted under typical worst-case conditions that generate the highest emissions. Consistent with DEQ's Source Sampling Manual, it will be imperative to describe in detail the proposed process conditions that generate such "worst-case conditions". Because the facility accepts and burns a wide variety of materials (municipal solid waste, regulated medical waste, industrial solid waste, special waste, liquid), multiple source testing events may be required for DEQ to understand the facility's range of toxic air contaminant emissions and approve a risk assessment that covers the broad range of operational conditions.
2. Only regular operating staff may adjust the production process and emission control parameters during the source performance tests and within two (2) hours prior to the tests. Any operating adjustments made during the source performance tests, which are a result of consultation during the tests with source testing personnel, equipment vendors or consultants, may render the source performance test invalid.
3. DEQ must be notified of any changes in the source test plan and/or the specified methods prior to testing. Significant changes not acknowledged by DEQ could be the basis for invalidating a test run and potentially the entire testing program. Documentation of any deviations must include an evaluation of the impact of the deviation on the test data.
4. It is acceptable to postpone a scheduled test or suspend a test in progress if the discontinuation is due to equipment failure beyond the facility's control, construction delays beyond the facility's control, severe meteorological conditions, and situations that would jeopardize the safety of the testing contractors and/or operators. If the test is underway, the permittee must make every effort to complete the test run. If the test run cannot be finished the sample must still be analyzed and results must be included in the test report unless written permission is received from DEQ stating otherwise. All recoverable test information (process & sample data) must be included in the test report along with a detailed explanation of why the test run could not be finished. Covanta may include discussions regarding the validity of such test runs and DEQ will determine if a run is valid.

It is unacceptable to postpone or suspend a test run in progress if it is discontinued because the source is not able to comply with an emission limit or verify an emission factor.

### ***Specific Comments***

1. Upon review of annual steam data, high-fire testing steam rate must be greater than or equal to 67 klbs/hr.
2. EPA Method 5/26A must be sampled isokinetically if used for analysis of particulate matter (MoO<sub>3</sub>).
3. Analysis for chloride, total metals, and total halogenated organics must be completed on the liquid that is used for Liquid Direct Injection (LDI).
4. Supplemental natural gas fuel (if used) will be reported as scf.

### ***Approved Deviations***

1. DEQ approves the requested EPA Method 0061 deviation to use 0.1M sodium bicarbonate as the impinger solution in place of 0.1M KOH.
2. DEQ approves the requested CARB Method 430 deviation to use a calibrated dry gas meter in place of a rotameter.
3. DEQ approves the requested CARB Method 430 deviation to use a toluene “float” in the DNPH impingers to capture acrolein and to prevent interference from NO<sub>x</sub>.
4. DEQ approves the requested EPA Method 26A deviation for constant rate sampling only for halogens and hydrogen halides.

Any further modifications and/or alternatives to testing methods or procedures that are implemented 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 the basis for invalidating an entire test run and potentially the entire testing program.

The DEQ extension request approval letter dated June 23, 2021 requires source testing to be completed by December 31, 2021. DEQ recognizes the unique challenges this testing pose to your facility and operations, and the results will provide valuable information for completing the risk assessment. If you have any questions or concerns, please contact me directly at (503) 229-5534 or [thomas.rhodes@deq.state.or.us](mailto:thomas.rhodes@deq.state.or.us). Thank you for your continued efforts with this process.

Sincerely,

*Thomas Rhodes*

Thomas Rhodes  
DEQ CAO Source Test Coordinator

Cc: Jeffery Hahn, Covanta Marion, Inc.  
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