

**Covanta Marion, Inc.**  
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December 8<sup>th</sup>, 2021

Ms. Kenzie Billings  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232

Re: Request for Extension Pursuant to OAR 340-245-0030(3)  
for Completion of Cleaner Air Oregon Air Toxics Test Program

Dear Ms. Billings:

The source test plan Covanta Marion, Inc. (CMI) submitted for the testing required by the Cleaner Air Oregon program was approved by the Oregon Department of Environmental Quality (DEQ) on December 3<sup>rd</sup>, 2021. The source test plan outlines specific operating conditions that would be expected to produce the highest emissions under 'worst case' scenario operations. One of the conditions CMI proposed operating under was a minimum injection rate of 3 gallons per minute of leachate from the Marion County monofil.

At the start of the testing, CMI had sufficient leachate on hand to complete the first two days of testing, with the expectation that additional deliveries later in the week would provide the necessary volume of leachate to inject the minimum proposed leachate rate for the remainder of the testing. On December 7<sup>th</sup>, 2021, CMI was informed that leachate deliveries would not resume until the start of the new year (2022), due to the unforeseen breakdown of two pumps that transfer the liquid into tankers for delivery to CMI. It is CMI's understanding that the contract between Marion County and their transportation contractor contains specific details on the transfer/loading of the material. Due to these contractual obligations, the transportation contractor is unable to receive the material for delivery to CMI while the pumps are out of service.

The following table provides an overview of the testing that has been completed and that which remains once CMI can resume operating under the conditions specified in the approved source test plan.

Day	Unit/Location	Parameter	Reference Method	Replicates	Completion Status
1 – Dec 7					
	1 Stack*	MMTL, plus Al, Fe, Mo and V	EPA 29	1, 2	Completed
	1 Stack*	HCl, HF	EPA 26A (Modified)	1, 2	Completed
2 – Dec 8					

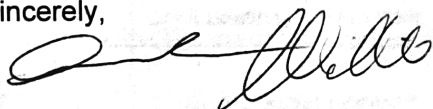
	1 Stack*	MMTL, plus Al, Fe, Mo and V	EPA 29	3	Pending
	1 Stack*	HCl, HF	EPA 26A (Modified)	3	Pending
	2 Stack	SLO-SMVOC and SMVOC (4)	EPA SW-846 0031	1, 2, 3	Completed
	2 Stack	HCl, HF, HBr, Cl <sub>2</sub> & Br <sub>2</sub>	EPA 26A (Modified)	1, 2, 3	Completed
	2 Stack	Ammonia	BAAQMD ST1B	1, 2, 3	Completed
	2 Stack	Formaldehyde, acetaldehyde, acrolein	CARB 430	1, 2, 3	Completed
3 - Dec 9					
	1 Stack	MMTL, plus Al, Fe, Mo and V	EPA 29	1, 2, 3	Pending
	1 Stack	Chromium VI <sup>(3)</sup>	EPA SW-846 0061	1, 2, 3	Pending
	2 Stack	PCDD/F, PCB	EPA 23	1, 2	Pending
	2 Stack	PAH	CARB 429	1, 2	Pending
4 - Dec 10					
	1 Stack	Chlorobenzene, Chlorophenol	EPA SW-846 0023a	1, 2	Pending
	2 Stack	PCDD/F, PCB	EPA 23	3	Pending
	2 Stack	PAH	CARB 429	3	Pending
	2 Stack	Chlorobenzene, Chlorophenol	EPA SW-846 0023a	3	Pending

\*Acute toxicity testing at reduced load

Due to the unavailability of leachate, which is beyond CMI's control, any testing conducted without injection of leachate would not adhere to the operating conditions proposed in the approved source test plan. Pursuant to OAR 340-245-0030(3), and based on the source testing contractor availability, we are requesting an extension to complete the remaining source testing by April 30, 2022.

Should you have any questions or need additional information please contact me or Kirk Little at 503-393-0890.

Sincerely,



Andrew Willis  
Environmental Compliance