



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
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December 14, 2021

Andrew Willis
Covanta Marion, Inc.
4850 Brookdale Rd. NE
Brooks, OR 97305

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

Mr. Willis,

On December 3, 2021, DEQ approved Covanta Marion, Inc.'s (CMI) source test plan (test plan) for testing scheduled for December 7-9, 2021. This test plan included a requirement that CMI complete testing with minimum liquid injection rates of 3 gallons per minute and 3.75 gallons per minute of leachate from the Marion County monofill during sampling of the stack emissions for high fire and low fire operating scenarios, respectively.

Testing was performed on December 7-8, 2021 while injecting the minimum proposed leachate rate. However, on December 7, 2021, CMI was informed that two pumps used to transfer leachate from the Marion County monofill's onsite storage lagoon into tankers for delivery to CMI had failed. Furthermore, CMI was informed that leachate delivery to the Marion facility would not resume until the new year (2022).

CMI provided a status update of which testing was completed and which testing was pending in the December 8, 2021 extension request. At least two additional days of testing are required to fulfill Cleaner Air Oregon (CAO) source testing requirements. Based on source testing contractor availability, and conditions proposed in the approved testing plan, CMI requested to extend the date by which CAO source testing must be completed to April 30, 2022.

DEQ will allow CMI to complete source testing by no later than March 31, 2022. The source test report for this testing must be submitted within 60 days of the completion of testing. An updated testing schedule to the approved source test plan must be submitted at least 30 days prior to testing.

In regards to the testing that was completed successfully on December 7-8, 2021, a source test report must be submitted to DEQ by February 6, 2022 as required in DEQ's March 11, 2021 letter. DEQ encourages CMI to complete source testing as soon as is feasible. Please contact me directly at 503.229.5247, billings.kenzie@deq.state.or.us if you have any questions regarding this extension.

Sincerely,

Kenzie Billings, P.E.
Air Toxics Project Manager

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