



Oregon

Kate Brown, Governor

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Covanta Marion, Inc.
4850 Brooklake Road NE
Brooks, OR 97305
Sent via email only

Terry Coble,

DEQ has reviewed the source test plan submitted by Covanta Marion, Inc. (CMI) on July 21, 2022 for additional testing of Toxic Air Contaminants (TACs) for generating an Emissions Inventory for Cleaner Air Oregon (CAO). Based on this review, DEQ requires that the following issues be addressed in a revised source test plan. A revised source test plan is due at least 7 days prior to the planned testing.

Specific Revision Comments

1. Page 7, Section 2.3. Please revise to include the specific operating condition for the proposed high fire testing condition:
 - a. Minimum steam load \geq 67 Klbs/hr (three run average)
2. Page 9, Section 3.1. Revise the Emission Parameters and Sampling Methods to reflect the planned scope of testing.
3. Pages 9-11, Section 3.3.1. Revise SW-846 Method 0031 estimated In Stack Detection Limits (ISDLs). Listed ISDLs in ng/dscm do not correspond to the listed analytical detection limits in μ g and planned sample volume of approximately 60 L. Actual ISDLs from previous testing were in the μ g/dscm range.
4. Page 17, Section 4.0. Please revise the Schedule of Activities to match planned test methods and dates.
5. Page 34, Section 8.1. Revise to include additional details regarding how the Regulated Medical Waste (RMW) burned during each test run is tracked, including but not limited to:
 - a. How the number of containers burned is tracked
 - b. How the weight of each container is determined
 - c. Submittal of the following with the source test report:
 - i. Waste tracking manifests corresponding to the deliveries of RMW burned
 - ii. To the extent possible, records of the number and waste subcategory of containers burned from each manifest.

DEQ recognizes the unique challenges this testing pose to your facility and operations. If you have any questions or concerns, please contact me directly at (503) 869-0054 or thomas.rhodes@deq.state.or.us. Thank you for your continued efforts with this process.

Sincerely,

Thomas Rhodes

Thomas Rhodes

24-5398 Covanta Marion, Inc.

DEQ CAO Source Test Coordinator

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File