



# Oregon

Kate Brown, Governor

Department of Environmental Quality  
Agency Headquarters  
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November 10, 2020

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

Re: Cleaner Air Oregon Toxic Air Contaminant Emissions Inventory Extension Request

Mr. Willis,

On August 13, 2020, Covanta Marion, Inc.'s (Covanta) facility in Brooks, Oregon was formally called in to the Cleaner Air Oregon program. On August 27, 2020, Covanta met with DEQ to discuss toxic air contaminant Emissions Inventory (Emissions Inventory) requirements. At this meeting, DEQ stated the need for quantification of polychlorinated dioxins and furans (PCDD/PCDFs), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), halogens, metals, and other reportable toxic air contaminants in the facility's Emissions Inventory. On October 26, 2020, Covanta submitted a formal extension request in accordance with OAR 340-245-0030 requesting a 45-day extension to the November 11, 2020 Emissions Inventory due date to:

1. Analyze additional metals analyses performed on EPA Method 29 samples collected during August source testing at the Brooks, Oregon facility
2. Coordinate with sister facilities to obtain representative emissions data for the toxic air contaminants listed above

On November 4, 2020, DEQ met with Covanta to discuss progress made in preparing the facility's Emissions Inventory and understand the formal extension request submitted on October 26, 2020. During this meeting, Covanta referenced source testing performed at one of Covanta's sister sites in Burnaby, British Columbia. Covanta is requesting that DEQ review the applicability of the Burnaby facility's source testing data to determine whether it is applicable to their Brooks facility. Covanta provided DEQ the Annual Trace Organics Emission Report (Report) dated September 25, 2020 from testing completed August 18-19, 2020 at this facility. The Report summarized testing results for PCDD/PCDFs, PAHs, PCBs, hexachlorobenzenes, chlorobenzenes, and chlorophenols during normal operations at the facility.

DEQ grants Covanta an additional 17 days to complete and submit the Emissions Inventory. Please submit your Emissions Inventory no later than **November 28, 2020**.

Please contact me directly at (503.229.5247, [billings.kenzie@deq.state.or.us](mailto:billings.kenzie@deq.state.or.us)) if you have any questions regarding this extension. We look forward to your continued assistance with this process.

Sincerely,

Kenzie Billings  
DEQ CAO Project Manager

Cc: Scott Anderson, Covanta Marion, Inc.  
Claudia Davis, DEQ  
Mike Eisele, DEQ  
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File