



# Oregon

Kate Brown, Governor

Department of Environmental Quality  
Agency Headquarters  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232  
(503) 229-5696  
FAX (503) 229-6124  
TTY 711

June 3, 2022

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

Terry Coble,

DEQ received the submittal of the Cleaner Air Oregon (CAO) Source Test Reports for the Covanta facility in Brooks, OR on March 9, 2022, and has completed an initial review.

In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ has determined that the following additional information, corrections, and updates are required **30 days** from the issuance of this letter, by **July 5, 2022**, in order to approve the Source Test Reports:

1. Low Steam Load Test Report
  - a. Method 29: Metals
    - i. Many of the metals were reported using an incorrect analytical detection limit for the back-half samples. Review and revise all metal results using the correct analytical detection limits or the detected values as reported from the lab.
2. High Steam Load Test Report
  - a. Please revise the facility process data in Appendix B to include the 1-minute process data for each of the test runs.
  - b. Method 26A: Halogens and Hydrogen Halides
    - i. Revise the steam values, given in pound pollutant per 1,000-pound steam [lb/1000 lb], for all halogens and hydrogen halides using the Unit 1 steam production data from March 9, 2022.
  - c. Method 29: Metals
    - i. Many of the metals were reported using an incorrect analytical detection limit for the back-half samples. Review and revise all metal results using the correct analytical detection limits or the detected values as reported from the lab.
  - d. Method 23: Dioxins, Furans, and Polychlorinated Biphenyls (PCBs)
    - i. For dioxins, furans, and PCBs that were below the lab analytical detection limits, revise reported results using the In-Stack Detection Limit (ISDL) as specified in Section 2.11.c of the [Oregon DEQ Source Sampling Manual](#).
    - ii. For individual congeners that are reported as 'below the detection limit' for a given test result, the contribution of that congener to the 2,3,7,8-TCDD Equivalent value shall be calculated as 0.5 times the detection limit, as specified in Section 2.11.c of the Oregon DEQ Source Sampling Manual
    - iii. Revise the Total PCB results as the sum of **all** PCBs and not as the sum of only the reportable PCB congeners.
  - e. CARB Method 429: Polyaromatic Hydrocarbons (PAHs)

- i. For PAHs that were below the lab analytical detection limits, revise reported results using the ISDL as specified in Section 2.11.c of the Oregon DEQ Source Sampling Manual.

DEQ is requesting that you submit revised Source Test Reports by **July 5, 2022**. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in OAR 340-214-0130 to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss this information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of OAR 340-245-0030(1).

If you have any questions regarding this letter, please contact me directly at (503-869-0054, [thomas.rhodes@deq.oregon.gov](mailto:thomas.rhodes@deq.oregon.gov)), and I look forward to your continued assistance with this process.

Sincerely,

*Thomas Rhodes*

Thomas Rhodes  
DEQ CAO Source Test Coordinator

Cc: Kirk Little, Covanta Marion, Inc.  
Jeffery Hahn, Covanta Marion, Inc.  
Michael Eisele, DEQ  
Claudia Davis, DEQ  
Julia DeGagné, DEQ  
J.R. Giska, DEQ  
Matt Davis, DEQ  
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