

Covanta Marion, Inc.

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May 20th, 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:

On March 11th, Covanta Marion, Inc. (CMI) received formal notification from the Department of Environmental Quality (DEQ) of required source testing to be completed by June 21st, 2021 for additional toxic air pollutants required for reporting under the Cleaner Air Oregon (CAO) program. Unfortunately, DEQ's requested testing schedule is not attainable due to circumstances beyond the control of CMI. Principal among these is the availability of source testing contractors with specifically trained staff with a focus on laboratory preparation, including procurement of additional analytical reference standards for compounds currently not included in the EPA or CARB methods, but requested by CAO. An additional limitation is CMI's long-planned maintenance outage downtime, the scheduling of which has been complicated by limited maintenance contractor availability during the COVID-19 pandemic.

CMI has engaged with several CARB certified, well-qualified firms for this comprehensive air toxics source testing program and we are reviewing their bids and qualifications to accomplish the scope of work requested by CAO. None of these firms are available to complete source testing by June 21st due to previous schedule commitments nationwide during the May-June 2021 timeframe. The testing firms' contract laboratories must also review the CAO analytical requirements for compounds that are not on the list of standard analytes for the proposed test methods that CMI agreed to evaluate. Additionally, obtaining appropriate laboratory reference standards will extend beyond June 21st. Lastly, CAO has expressed interest in having CMI test later in the fall, when municipal solid waste may have a higher moisture content, and also to allow for a longer period between planned maintenance outage work and source testing.

Pursuant to OAR 340-245-0030(3), we are requesting an extension to complete this comprehensive 2021 CAO source testing program no later than December 31, 2021. This date reflects DEQ's above referenced concerns regarding waste moisture content and post-outage timing. With an extension of the CAO source test due date, DEQ will also have the opportunity to ensure all test conditions, methodologies, and data reporting requirements are carefully constructed and clearly described in the Source Test Plan (STP) required to be submitted in advance of CAO air toxics source testing.

Finally, CMI intends to complete Title V Permit specific performance testing, including RATA and start up and shut down testing, during summer 2021 in order to maintain compliance

with condition 35.f. of Title V Permit Number 24-5398-TV-01, which requires testing completion within 15 calendar months following the previous performance test (August 2020). A separate STP for the Title V Permit testing, as required by DEQ, will be submitted in a timely manner.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Willis". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Andrew Willis
Environmental Compliance