



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Agency Headquarters
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April 25, 2023

Scott Anderson
Covanta Marion, Inc.
4850 Brooklake Road NE
Brooks, OR 97305

Sent via email only

Scott Anderson,

On April 17, 2023, DEQ received a request from Covanta Marion, Inc. (Covanta) for a 30-day extension of the deadline to respond to DEQ's March 20, 2023, letter (Information Request) with a revised submittal of the Cleaner Air Oregon (CAO) Emission Inventory (Inventory). The Inventory is currently due on May 4, 2023. DEQ met with Covanta staff on April 20, 2023, to discuss the extension request. DEQ understands that Covanta is requesting additional time to: (1) obtain photographic documentation of the ammonia tanker transfer operations and detection system in order to respond to Item 2.c of the Information Request; and (2) estimate emissions from maintenance activities in order to respond to Items 2.a and 2.b of the Information Request.

Regarding Item 2.c of the Information Request, DEQ understands from our April 20, 2023, meeting that Covanta currently has sufficient information to provide a response, but with additional time would be able to include additional photographic documentation of the tanker transfer operations. DEQ has not required photographic documentation of the transfer at this time; therefore an extension specifically for providing this additional information will not be granted at this time.

Regarding Items 2.a and 2.b, DEQ may grant an extension based on the criteria set in [OAR 340-245-0030\(3\)](#), which require sources to demonstrate progress towards completing the submittal and show that a delay is necessary for good cause. DEQ understands that Covanta has made progress in responding to the Information Request by obtaining information from vendors and working with a consultant to complete emissions estimates, and that the data analysis required is time and resource intensive. However, DEQ made Covanta aware of CAO's requirements for documenting emissions from maintenance activities in a previous information request on August 19, 2022, and subsequently approved a 30-day extension of the due date for that information request, partially in order to allow Covanta time to gather information about maintenance activities. Covanta submitted some relevant information on October 18, 2022, and requested that these activities be determined to be Exempt Toxics Emissions Units (TEUs), but did not include sufficient emissions data for DEQ to make this determination. With the March 20, 2023 Information Request, DEQ provided 45 additional days for Covanta to develop these emissions estimates. For these reasons, DEQ will only partially approve Covanta's request and grant an 11-day extension from the original submittal deadline of May 4, 2023. Covanta's revised Inventory and full response to the March 20 Information Request must be submitted by no later than **May 15, 2023**.

Please contact me directly at 503.866.9643, julia.degagne@deq.oregon.gov, if you have any questions regarding this extension or the Inventory submittal requirements.

24-5398 Covanta Marion, Inc.



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Sincerely,

Julia DeGagne

Julia DeGagné
Air Toxics Project Manager

Cc: Terry Coble, Covanta Marion, Inc.
Joseph Walsh, Covanta Marion, Inc.
Jeffery Hahn, Covanta Marion, Inc.
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File