Covanta Marion, Inc.
4850 Brooklake Road NE
PO Box 9126
Brooks, OR 97305
Tel (503) 393-0890
Fax (503) 393-9714

Powering Today. Protecting Tomorrow.

April 17, 2023

Ms. Julia DeGagne
Air Toxics Project Manager
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232

Re: Covanta Marion, Inc. (CMI) Cleaner Air Oregon Emission Inventory Submittal

Dear Ms. DeGagne:

We have received the Department's correspondence dated March 20, 2023, requesting CMI to submit various documents associated with an Emissions Inventory prepared in accordance with the Cleaner Air Oregon program. The deadline for submission of the requested data is May 4, 2023.

Although CMI is making progress in addressing each of the Specific Comments, there are a couple requested items that will need additional time to complete. For example, we want to document our ammonia detection system during a tanker transfer to our storage tank in order to accurately demonstrate that there are no ammonia emissions during tanker transfer and normal operations. We anticipate a delivery sometime in early May based on both our consumption rate and current inventory levels. Additionally, we have contacted our primary contractor who completes welding during our scheduled maintenance shutdowns for information on their welding usages and locations. We are expecting the information soon but will need some time to quantify the data, estimate actual and potential emissions, and identify the relevant locations (e.g., inside the boiler or in the maintenance shop).

Accordingly, we request that the above referenced deadline be extended an additional 30 days.

We look forward to continuing to work with the Department to meet the goals of the Cleaner Air Oregon program. Should you have any questions or need additional information please contact me at 503-393-0890.

Sincerely,

Scott Anderson
Facility Manager

Cc: Michael Eisele, DEQ,
        Kasey Carlson, Covanta Marion Inc.
        Terry Coble, Covanta Marion Inc.
        Jeffrey Hahn, Covanta Consultant
        Jesse Gonzalez, Trinity Consultant