



Oregon

Tina Kotek, 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

July 28, 2023

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

Scott Anderson,

Covanta Marion, Inc. (Covanta) in Brooks, OR was called in to the Cleaner Air Oregon (CAO) program on August 13, 2020, with an initial CAO Emissions Inventory Form (Inventory) due date of November 11, 2020. DEQ granted a 17-day extension of the initial due date, and Covanta submitted the Inventory on November 24, 2020. DEQ completed an initial review and responded on March 11, 2021, requiring source testing of the Municipal Waste Combustors, MWC-1 and MWC-2, for the purpose of emission factor development for use in a revised Inventory. Source testing was initially required to be completed no later than June 21, 2021. At Covanta's request, DEQ granted two extensions of the source testing deadline (to December 31, 2021 and March 31, 2022), and source testing was completed in December 2021 and March 2022. On August 19, 2022, DEQ approved the source testing and, in accordance with Oregon Administrative Rule [\(OAR\) 340-245-0030\(2\)](#), outlined requirements for the revised Inventory to be submitted no later than September 19, 2022. Covanta requested and received a 30-day extension of this due date and submitted the revised Inventory on October 18, 2022. DEQ issued a second written request on March 20, 2023, requiring additional information and a revised Inventory to be submitted on May 4, 2023. On April 17, 2023, Covanta requested a 30-day extension of this deadline, and DEQ granted an 11-day extension, to May 15, 2023. Covanta submitted a revised Inventory with supporting information on May 12, 2023.

DEQ has reviewed the revised Inventory and identified additional updates that are needed before approval. In accordance with [OAR 340-245-0030\(4\)\(b\)](#), DEQ is providing Covanta with a revised deadline for submittal of a revised Inventory. Please submit the information specified below by **September 1, 2023**.

General Comments

To request an "Exempt Toxic Emissions Unit (TEU)" designation for welding activities under [OAR 340-245-0060\(3\)\(a\)](#), Covanta must submit emissions data and risk calculations demonstrating that welding activities are not likely to materially contribute to facility risk. DEQ will evaluate the risk presented and make determinations on a case-by-case basis.

The aqueous ammonia storage tank may be considered an Exempt TEU under [OAR 340-245-0060\(3\)\(a\)](#), based on information provided by Covanta in the March 12, 2023 Inventory

24-5398 Covanta Marion, Inc.

submittal and in a meeting with DEQ staff on April 20, 2023. At the reported throughput and with the emission controls currently in place (including enclosure of the tank and transfer system, vapor balancing during tank filling, and a leak detection system), ammonia emissions are not likely to exceed the 1,000 pound per year threshold listed in DEQ's CAO [Exempt TEU Reporting](#) document.

In addition to the revisions requested by DEQ, Covanta has made the following updates to the emission factors for the MWC-1 and MWC-2 TEUs:

- The safety factors applied to polycyclic aromatic hydrocarbon (PAH) emissions are at least 10 times the source test results; and
- The safety factor applied to mercury emissions is 200 times the source test results.

Specific Comments

1. Revise the Inventory and supplemental materials to include Toxic Air Contaminant (TAC) emissions from welding activities as follows:
 - a. Designate TEUs as needed to represent the following:
 - i. Outdoor welding;
 - ii. Inside-boiler welding;
 - iii. Maintenance building welding; and
 - iv. Boiler building (outside the boiler) welding;
 - b. Update emission factor calculations to include all TACs present in the welding material Safety Data Sheets (SDSs);
 - c. Use the composition information in the SDSs, rather than default San Diego County Air Pollution Control (SDAPCD) composition data, to determine emissions using the SDAPCD guidance¹;
 - d. Assume zero percent capture/control for welding emissions in the boiler building (outside the boiler)²;
 - e. Assume a maximum 99 percent control efficiency for the baghouse (in-boiler welding) and fume extractor (maintenance building welding). Alternatively, Covanta may provide manufacturer's specifications and/or test data demonstrating a higher control efficiency – this data should specify efficiencies as a function of particle size;
 - f. Provide manufacturer's specifications for the Grainger HEPA fume extractor used to control welding emissions in the maintenance building;
 - g. Provide Maximum Daily and Annual Requested Potential to Emit usage and emissions data for all welding activities;
 - h. Provide SDSs for the following welding materials:
 - i. ER80S-B2; and
 - ii. 90SB-3;
 - i. For the "Messer MG289" welding material:

¹ San Diego Air Pollution Control District, Welding Operations, Revised July 11, 2022. Available at: <https://www.sdapcd.org/content/dam/sdapcd/documents/permits/emissions-calculation/welding/APCD-Welding-Operations.pdf> [Accessed July 5, 2023].

² This assumption is based on the typical particle size distribution of welding emissions (primarily less than 2.5 microns in diameter) and DEQ's current understanding of ventilation in the boiler building.

- i. Clarify which product Covanta uses (the supporting calculations list “MG289” as the product, but the SDS provided is for “MG382”), and update the SDS or supporting calculations as needed; and
 - ii. Clarify the type of process this product is used in (e.g. soldering, brazing or welding). If the rod is used in welding, include these emissions in the Inventory; if used in soldering or brazing, based on DEQ’s analysis of potential emissions at the usage rates reported, this activity may be considered an Exempt TEU under [OAR 340-245-0060\(3\)\(a\)](#).
 - j. SDSs were provided for the following products – please include their usage in the Inventory, or confirm that Covanta does not plan to use them:
 - i. Lincoln Electric Techrod 112;
 - ii. Lincoln Electric Fleetweld 35;
 - iii. ESAB Stooddy 77; and
 - iv. Radnor Carbon Arc electrodes.
2. Provide estimates of maximum projected annual usage and TAC emissions for chemicals used in maintenance activities. This information is needed to evaluate Covanta’s request to designate chemical usage as an Exempt TEU, and may be estimated from actual annual usage with a safety factor applied to cover potential variability;
3. Update the emission factor in the Inventory for xylene (mixture) (CASRN 1330-20-7) for MWC-1 and MWC-2 to include a safety factor consistent with other reported volatile organic compound TACs;
4. 1,2,4-Trichlorobenzene (CAS 120-82-1) has been reported twice in the Inventory for each MWC due to its inclusion in two source test methods. To avoid double-counting, remove the two line items listing the 0.000808 pounds per hour emission factor from Tab 3 of the AQ520;
5. On Tab 3 of the AQ520, remove the line items for chemicals that are not TACs listed in [OAR 340-247-8010 Table 1](#) (21 line items for each MWC TEU); and
6. On Tab 2 of the AQ520, include TEU IDs for Exempt TEUs (e.g., lime storage silos, carbon storage silo, cooling towers, brazing, and ammonia storage tank) in column A. TEUs which are exempt under [OAR 340-245-0060\(3\)\(a\)](#) should be listed in the Inventory but usage data and emissions do not need to be quantified in the AQ520.

DEQ is requesting that you submit additional information to complete your Inventory. 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 deadline 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 503-866-9643 or julia.degagne@deq.oregon.gov, and I look forward to your continued assistance with this process.

Sincerely,

Julia DeGagne

Julia DeGagné
Air Toxics Project Manager

Cc: Terry Coble, Covanta Marion, Inc.
Brian Kent, Covanta Marion, Inc.
Joseph Walsh, Covanta Marion, Inc.
Jeffery Hahn, Covanta Marion, Inc.
Kasey Carlson, Covanta Marion, Inc.
Jesse Gonzalez, Trinity Consultants
Michael Eisele, DEQ
J.R. Giska, DEQ
File