

From: [DEGAGNE Julia * DEQ](#)
To: "Jesse Gonzalez"; Hahn,Jeffrey
Cc: [RUDLOFF Owen * DEQ](#); [EISELE Michael * DEQ](#); [GISKA JR * DEQ](#)
Subject: Covanta Marion CAO Emissions Inventory Meeting follow up
Date: Wednesday, October 18, 2023 10:59:49 AM
Attachments: [image001.png](#)

Hi Jeff and Jesse,

Thanks for meeting with us yesterday to discuss Covanta's CAO Emissions Inventory. Below is a list of some follow-up items that we discussed:

1. Welding Controls (WELD-MAINTENANCE TEU):
 - a. Please identify the specific model of fume extractor that Covanta plans to use in the maintenance shop – the RoboVent specification sheet in Attachment 1 includes several models. Also indicate whether the fume extractor has a single HEPA filter or will include a primary filter with a secondary HEPA filter.
 - b. We've received a spec sheet for the HEPA filters – please provide any additional documentation you have directly from the manufacturer regarding control efficiency.
 - c. Provide a timeline for installation of the fume extractors and HEPA filters.
2. Welding Throughputs: Confirm that the daily maximum welding usages submitted reflect true potential future maximum usages that could reasonably be tracked on a daily basis, and provide any updates if changes are needed to projected usage amounts or products. One potential option we discussed is to calculate acute risk using the highest-risk welding rod for all welding on any given day, so that any necessary daily tracking would be for total welding usage rather than individual products. Right now, these are the maximum total daily welding amounts in the Inventory:
 - a. WELD-MAINTENANCE TEU: 8.06 lbs/day
 - b. WELD-BOILER TEU: 28.1 lbs/day
 - c. WELD-BB TEU: 1.11 lbs/day
 - d. WELD-OUTDOOR TEU: 0.01 lbs/day
3. Level 1 Risk Assessment:
 - a. Provide a map indicating Covanta's property boundary and the locations of the emission points (or building areas, if assessing fugitive sources as buildings) for the WELD-MAINTENANCE, WELD-BOILER, and WELD-BB TEUs.
 - b. As we discussed, Covanta will need to request a zoning location change if they decide to assess the adjacent Exclusive Farm Use (EFU) zoning as acute exposure location rather than residential, worker, and acute. This will impact the risk assessment and the exemption determination for the welding TEUs. As we discussed, please let me know **by Friday 10/20** if Covanta has made a decision about this. If Covanta wishes to submit the zoning location change forms, they are:
 - i. [AQ521 Exposure Location Change Request Form](#); and
 - ii. [AQ522 Exposure Location Change Request Table](#).
4. Maintenance Shop Chemical Usage (CHEMUSE TEU): Please indicate whether Covanta intends to continue using the product "45% VOC TALON ECONOMY BRAKE PARTS CLEANER" and if so, provide a maximum annual usage amount. This TAC-containing product is listed in the "Chemical Use" tabs of Attachment 2 ("Chemical Usage Data"), but was not included in the "Covanta TAC Data" tab. Based on the SDS provided and Covanta's projected usage assumptions, continuing to use this product would not increase risk above the threshold values in DEQ's Exempt TEU guidance – we would just like to confirm usage amounts.

Please provide answers to the above as they are available (and for 3b by Friday 10/20). I will plan to include any outstanding items along with DEQ's updates to the emission factor calculations in our next letter. We appreciate your help so far working through these final details – feel free to reach out with questions any time.

Sincerely,



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