

From: [Jesse Gonzalez](#)
To: [DEGAGNE Julia * DEQ](#)
Cc: [RUDLOFF Owen * DEQ](#); [EISELE Michael * DEQ](#); [GISKA JR * DEQ](#); [Hahn,Jeffrey](#); [Coble,Terry](#)
Subject: RE: Covanta Marion CAO Emissions Inventory Meeting follow up
Date: Friday, October 20, 2023 4:03:39 PM
Attachments: [image002.png](#)
[image004.png](#)
[Attachment 2. Chemical Usage Data 2023-1020.xlsx](#)

Hi Julia,

In response to Item 4 in your October 18, 2023 email, the maximum annual usage of the 45% Talon Economy VOC Economy Brake Parts Cleaner should be 149 lbs. The original intent was to combine the two brake parts cleaners into a single item, however the formula was not carried through to our previous versions in our September 1 submittal to you. After further review of this material's break down (which is slightly different than the other brake parts cleaner) and also since including will not change the outcome of the review, we added this material to the attached spreadsheet and accounted for the usage appropriately this time. Similarly to other materials, we applied a safety factor of 2 to the maximum usage for this material from 2020 through 2022.

Please let us know if you have any questions or comments, thanks!

Jesse Gonzalez

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[11/14/23 – Air Quality Permitting in Washington \(SEATTLE\)](#)

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Subject: RE: Covanta Marion CAO Emissions Inventory Meeting follow up
Date: Friday, October 20, 2023 4:04:44 PM
Attachments: [image002.png](#)
[image004.png](#)
[RoboVent HEPA Filter.Eff .Guide-8-31-15.pdf](#)

Julia,

Please see attached documents in response to Item 1 in your October 18, 2023 email. The RoboVent G-110 HEPA filter attachment and HEPA filters for the Series 100, Model VB-800-1 RoboVent system already in use at Covanta Marion will be fabricated and delivered within 10 weeks from 8/31/23, due to the fabrication time needed by the supplier. The G-110 works behind two pre-filters, a metal mesh filter and a MERV 15 filter, before the HEPA filter (please refer to the attachment showing the existing metal mesh and MERV 15 pre-filters). The second to last listing on the attached specification sheet are the HEPA filters to be used at Covanta Marion with a 99.97% DOP removal efficiency. We have attached photos taken in the shop of the existing RoboVent, equipment identification number and the filter setup.

Please let us know if you have any questions or comments, thanks!

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Subject: RE: Covanta Marion CAO Emissions Inventory Meeting follow up
Date: Friday, October 20, 2023 4:06:37 PM
Attachments: [image002.png](#)
[image004.png](#)
[AQ521Form v1.0 Printed.pdf](#)
[AQ522Form v1.0.xlsx](#)
[Map of Zoning Variance Request.pdf](#)
[Covanta Marion Welding Locations.pdf](#)

Julia,

Please see attached documents in response to Item 3 in your October 18, 2023 email. Covanta is electing to submit the Exposure Location Change Request forms. Although AQ521 form states that it is to be submitted along with the modeling protocol, we intend on using this for the Level 1 and wanted to provide this to you as soon as possible. It should be noted at this time that Covanta is only requesting the variance for the plot located to the west of the facility, however there is additional exclusive farm use shown in the Marion County zoning maps to the south and southeast of the facility. As part of the risk assessment submittal Covanta will reserve the right to request this variance for additional areas zoned as exclusive farm use if needed.

Additionally, please see commentary below regarding Item 3a in your request. A map is also attached as requested that identifies the locations of each welding TEU and the boiler building.

- WELD-BOILER TEU
 - Source is modeled as a point source, with the stack height of 78 m (50 m for the actual Level 1 assessment since that is the default factor with the highest stack height)
- WELD-MAINTENANCE TEU
 - Source should also be modeled as a point source
 - The RoboVent system exhausts through a roof vent on the shop, with a stack height of 5 m
- WELD-BB TEU
 - Per our discussions on Tuesday, we consider the roof vent on the boiler building to be a point source and will model it in the Level 1 accordingly. Our reasoning as to why this should be a point source is due to the chimney effect of hot outside boiler surface heating the surrounding boiler building air and exhausting out the roof as indicated by the different color patterns on the roof adjacent to the roof vents. There are four doors located at the boiler building, however they are typically closed and any welding fumes would rise with the heated air through the roof vents.
 - The stack height would be equivalent to the height of the building which is 20 m.
 - If Cleaner Air Oregon requests us to model the boiler building as a fugitive source, please provide further clarification. We have outlined the boiler building in the attached map (see blue outline) for your reference.

Please let us know if you have any questions or comments, thanks!

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