



Oregon

Tina Kotek, Governor

Department of Environmental Quality
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November 7, 2023

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

Jesse Jensen,

DEQ received the submittal of the revised Cleaner Air Oregon (CAO) Emissions Inventory for Covanta Marion, Inc. (Covanta) in Brooks, OR on August 31, 2023. Additionally, Covanta submitted Exposure Location Change Request forms and supplemental information related to maintenance activities on October 20, 2023. This letter serves as notice to you that DEQ has reviewed and approves the Emissions Inventory and the Exposure Location Change Request. Please note that this Exposure Location Change Request approval applies only to Tax Lot 062W17C000500 (located adjacent to the west and south of Covanta) and only to the Level 1 risk analysis for making the Exempt Toxics Emissions Unit (TEU) determination of the welding activities.

Based on the throughput and product information provided, DEQ approves Covanta's request that the CHEMUSE, WELD-OUTDOOR, WELD-BOILER, WELD-MAINTENANCE and WELD-BB TEUs be designated Exempt TEUs under [OAR 340-245-0060\(3\)\(a\)](#). As discussed with representatives from Covanta and Trinity Consulting on October 17, 2023, DEQ has revised the emission calculations and Level 1 risk analysis for welding activities and is providing the updated calculations in Attachment A to this letter. Updates were made for consistency with DEQ's emission estimation methodology, to incorporate additional equipment information provided by Covanta, and to use more conservative assumptions about usage rates to estimate maximum daily emissions. Emails to DEQ from Trinity Consulting on October 20, 2023, and November 2, 2023, indicated that Covanta considers emissions from the WELD-MAINTENANCE and WELD-BB TEUs to be point sources rather than fugitive sources. Based on our understanding of the building and exhaust configurations, DEQ cannot currently confirm that all emissions would exhaust through the roof vents. Because of this, and due to the limitations of the Level 1 risk assessment methodology, we have retained the more conservative designation of "fugitive" emission release for the purposes of making an exemption determination for these TEUs. If Covanta would like to request updates to maximum throughputs, product information, or risk assessment for welding activities, you may resubmit the calculations and request a re-evaluation of DEQ's exemption determination at any time.

The next step in the CAO process is to submit the Modeling Protocol no later than thirty (30) days after the date of this letter, by December 7, 2023. [\[OAR 340-245-0030\(1\)\(b\)\]](#) Modeling Protocol requirements are listed in [\[OAR 340-245-0210\(1\)\(a\)\]](#). If you plan to complete a Level 3 or 4 Risk Assessment, your Risk Assessment Work Plan (RAWP) must be submitted to DEQ by no later than sixty (60) days from the date of this letter, by January 6, 2024. [\[OAR 340-245-0030\(1\)\(c\)\]](#) RAWP requirements are listed in [\[OAR 340-](#)

24-5398 Covanta Marion, Inc.

[245-0210\(2\)](#).

If you have any questions regarding this letter, please contact me directly at (503) 866-9643 or julia.degagne@deq.oregon.gov. I look forward to your continued assistance with this process.

Sincerely,

A handwritten signature in black ink that reads "Julia DeGagne". The signature is written in a cursive, flowing style.

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.
Jesse Gonzalez, Trinity Consultants
Josh Haar, Trinity Consultants
Michael Eisele, DEQ
J.R. Giska, DEQ
Zach Loboy, DEQ
File

Enc: Attachment A. Supplemental Welding Data_DEQ.xls