



Oregon

Kate Brown, Governor

Department of Environmental Quality
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May 29, 2020

Marie E. Piper
Cascade Environmental Management
316 SE Pioneer Way, Suite 294
Oak Harbor, Washington 98277

Re: Response to ORRCO-IOI Klamath Falls Additional Deadline Extension Requests

Ms. Piper,

The Oregon Department of Environmental Quality (DEQ) received written notification from you on behalf of Oil Re-Refining Company (ORRCO) on May 13, 2020, requesting an extension of time for submittal of the current June 15, 2020 revised emissions inventory submittal and July 30, 2020 source testing completion deadlines for the ORRCO facility in Klamath Falls, Oregon. DEQ understands that ORRCO would like an extension to each of these submittal timelines for the following reasons:

1. Source testing cannot be scheduled with the contracting company until later in August.
2. A new burner for the Klamath Falls facility is on order, but its delivery is delayed due to COVID-19. The new burner is capable of combusting oil and propane and will replace an old burner for which replacement parts are no longer available. ORRCO cannot commit to a source test date until the new burner is delivered and installed.
3. ORRCO is replacing recycled fuel oil (RFO) with propane as a back-up fuel for their auxiliary boiler. This decision impacts the emissions inventory as well as the final decision on the source test operating conditions.

ORRCO has also indicated that the results of the source testing could be used to estimate emissions from similar operations at their Portland facility. Additional information will be required in order to determine applicability of the results to Portland operations. To make this determination, DEQ requests that ORRCO provide the following:

- A comparison of the design, operation, and emissions of the process units at the Portland facility to the burner at the Klamath Falls facility.
- Discuss and compare the distillate fuels combusted at each facility. Provide a comparison of the used oils accepted and processed at each facility, as well as the finished oil products.

DEQ approves ORRCO's request for an extension to the revised emissions inventory and source testing deadlines with the conditions outlined below:

1. ORRCO is switching from RFO to propane as a back-up fuel for their auxiliary boiler. Emissions inventory revisions, source testing, and permitting are impacted by this change:
 - a. The emissions inventory must be revised to reflect the change from RFO to propane use in the auxiliary boiler no later than **July 15, 2020**. Provide all assumptions and calculations used to estimate fuel usage.
 - b. The sampling method and analyte requirements outlined in DEQ's March 17, 2020 letter remain in place for source testing conducted on distillate fuels at this facility. Source testing shall be completed no later than **August 31, 2020**. Source test results are due to DEQ within 60 days after the testing is completed and must include the information required in Appendix A of the Source Sampling Manual.

DEQ grants ORRCO extensions for the revised emissions inventory and source test deadlines with the presumption that ORRCO will communicate any questions or clarifications proactively in order to provide timely and complete submittals. The revised emissions inventory shall be submitted no later than **July 15, 2020**. Source testing shall be completed no later than **August 31, 2020**.

Please contact me directly at (503.229.5247, billings.kenzie@deq.state.or.us). We look forward to your continued assistance with this process.

Sincerely,

Kenzie Billings
DEQ CAO Project Manager

Cc: Keith Johnson, DEQ
J.R. Giska, DEQ
Thomas Rhodes, DEQ
Frank Messina, DEQ
Scott Briggs, DEQ