



# Oregon

Kate Brown, Governor

Department of Environmental Quality

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December 13, 2019

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

Re: ORRICO-IOI Klamath Falls Emissions Inventory Submittal Deadline Extension Request  
ACDP No. 18-0020

Ms. Piper,

DEQ called ORRICO into the Cleaner Air Oregon (CAO) program on August 26, 2019. On November 15, 2019, Cascade Environmental Management, on behalf of Oil Re-Refining Company (ORRICO), requested that DEQ extend the submittal deadline for their Emissions Inventory (AQ405CAO) to December 15, 2019 for the following reasons:

1. Quarterly fuel analysis reports show that metals emissions factors used in the facility's most recent review report may not consider the actual metals concentrations in fuel oil used in the auxiliary boiler. Arsenic concentrations in the facility's fuel analysis reports are lower than are characterized by the arsenic emission factor used in the facility's 2018 review report. In addition, lead concentrations in the quarterly fuel analysis reports are higher than are characterized by the lead emission factor used in the 2018 review report. ORRICO would like to use analytical results from fuel oil samples collected on November 14, 2019 that were analyzed at lower detection limits in their AQ405CAO where possible.
2. ORRICO would like to have polychlorinated biphenyls (PCBs) and chlorinated compounds analyzed as extractable organic halides (EOX) analyzed at lower detection limits to verify the characterization of non-detect/zero emissions of these constituents and precursors from the distillate fuel and recycled fuel oil combusted in the auxiliary boiler. If PCBs or EOX are detected at lower detection limits, ORRICO would like the option to conduct source testing and extend the AQ405CAO submittal deadline to April 15, 2019.

DEQ approves this extension request with the following condition: provide analytical results for fuel oil samples collected on November 14, 2019 by Monday, December 16, 2019 with the completed AQ405CAO. ORRICO should also incorporate concentrations of metals, PCBs, and EOX detected in the fuel analyses as appropriate in the submittal.

DEQ appreciates the proposed testing and consideration of source testing. We will review and respond to your submittals and work with you to develop source testing protocols for specific processes and

equipment as needed. This approved extension timeline presumes ORRSCO will communicate any questions or clarifications regarding the above comments proactively in order to provide timely and complete submittals. DEQ is available to coordinate with ORRSCO to review any portion of this extension request as well as sections of the Emissions Inventory and any other pertinent documents to facilitate this process.

Please contact me directly (503.229.5247, [billings.kenzie@deq.state.or.us](mailto:billings.kenzie@deq.state.or.us)) with any questions or concerns. We look forward to your continued assistance with this process.

Sincerely,



Kenzie Billings  
Air Toxics Project Manager

Cc: Scott Briggs, ORRSCO  
Eric Moody, ORRSCO  
David Archuleta, ORRSCO  
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