



May 13, 2020

Kenzie Billings, PE  
Air Toxics Project Manager  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232

RE: ORRCO-IOI Klamath Falls Additional Deadline Extension Requests

Dear Kenzie,

Thank you for your time and assistance with ORRCO-IOI's emission inventory project. We are submitting this formal request for an extra 30-day extension of the current revised emission inventory submittal and source test deadlines. The current deadlines are June 15<sup>th</sup> for the revised emission inventory and July 30<sup>th</sup> for the source testing.

While we have made progress, the COVID-19 situation is having an impact on the source testing schedule. We can have a source test plan to you by the end of this month; however, we cannot schedule the source test until later in August. The new burner is on order; but, delays due to COVID-19 are inevitable. And we cannot commit to a source test date until we are certain the new burner is delivered and installed.

We are also considering whether to use RFO at Klamath Falls anymore. The facility is considering using propane as backup/supplemental fuel instead of RFO. This decision impacts the emission inventory as well as the final decision on the source test operating scenario. If propane was the backup/supplemental fuel to distillate fuel, do you see any concerns with source testing just the distillate fuel burn scenario, and using the source test data for the Portland facility as well?

Any thoughts and relief you could provide would be greatly appreciated. Please let me know if you need any additional information to support our request for another deadline extension.

Ms. Kenzie Billings, PE

May 13, 2020

Page 2

Thank you again for your time and help!

Best regards,

*M.E. Piper*

Marie E. Piper  
Principal Engineer

cc: JR Giska, ODEQ  
Thomas Rhodes, ODEQ  
Frank Messina, ODEQ  
Scott Briggs, ORRCO  
Andy Winkler, ETS