



Oregon

Kate Brown, Governor

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Oil Re-Refining Company
c/o Marie E. Piper
Cascade Environmental Management
316 SE Pioneer Way, Suite 294
Oak Harbor, Washington 98277

Ms. Piper,

DEQ received the submittal of the Cleaner Air Oregon (CAO) Level 1 Risk Assessment (Risk Assessment) and "Level 1 RA IOI Capacity 2021-12-29 Appendix B" (Appendix B) dated December 29, 2021 for the Oil Re-Refining Company, Inc. facility in Klamath Falls, OR and has completed our review.

DEQ approves the Risk Assessment and concludes that it is complete and satisfies the CAO requirements for performing a risk assessment pursuant to OAR 340-245-0050(1) with the following comments:

1. Risk Assessment

- a. Figure 6: The shortest distance from the Toxics Emissions Units (TEUs) to the nearest worker location was taken to the river. DEQ notes that a more reasonable likely worker exposure location would be at the northeast property boundary instead of the river. Because there is no substantial difference in distance to each location, DEQ considers it acceptable to assume worker exposure (chronic and acute) at the location identified in the Risk Assessment.
- b. Table 3-3: Risk should be presented as less than a value, such as <0.1 or <0.01 as appropriate, rather than 0.0.

2. Appendix B: TEU Tabs

- a. The Risk-Based Concentrations (RBCs) were not updated to include the recent rule updates (November 2021) to the RBC table [OAR 340-245-8010 Table 2]; note the following:
 - i. The acute RBC for antimony and compounds (CAS No. 7440-36-0) should be 1 $\mu\text{g}/\text{m}^3$.
 - ii. Polychlorinated biphenyl (PCB)-189 (CAS No. 39635-31-9) RBCs were corrected in the 2021 rule revisions. No emissions of PCB-189 were noted, so there is no change in calculated risk.
 - iii. Some Chemical Abstract Service Registry Numbers (CASRN) were revised in the November 2021 rule update, which were not updated in the Risk Assessment.
- b. *TEU Emissions* Tab: the 'TEU Emissions summary' tab contains an error in the calculation of maximum daily acute emission rates at capacity – it appears the emission rate at capacity for hexavalent chromium, 1.63E-4 lb/day, was incorrectly applied to other chemicals in the table. This error does not affect risk calculations.

DEQ has determined that your facility meets the criteria established in OAR 340-245-0050(7)(a)(A) to be designated as a de minimis source under the CAO program. Therefore, a Toxics Air Contaminant Permit Addendum (TACPA) is not required at this time to limit TAC emissions from this facility.

The next step in the CAO process is to complete and submit the AQ501 Cleaner Air Oregon Permit Application Form and the \$1,000 *Level 1 Risk Assessment –de minimis* activity fee. The completed AQ501 Form and applicable fee are due no later than **February 26, 2022**.

Please contact Kenzie Billings directly at 503.866.8741 or kenzie.billings@deq.oregon.gov with any questions.

Sincerely,

Kenzie Billings
Air Toxics Project Manager

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