



# Oregon

Kate Brown, Governor

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August 2, 2021

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

Ms. Piper,

DEQ received the revised Cleaner Air Oregon (CAO) Air Toxics Emissions Inventory Form AQ520 (Inventory) for the Oil Re-Refining Company (ORRRCO) facility in Klamath Falls, OR and has completed our review. In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ has determined that corrections are required in order to approve the Inventory.

Please revise the Inventory with the appropriate emission factors for the TACs listed below and resubmit the Inventory to DEQ no later than **August 31, 2021**. Polychlorinated biphenyls, polychlorinated dioxins and furans, polycyclic aromatic hydrocarbons, and metals were measured during August 2020 auxiliary boiler source testing. Some metals tested for using Method 29 had a mix of non-detects in the front half and/or back half of samples. One dioxin congener was detected during some, but not all test runs.

Method 29 source testing yields two analytical sample fractions per test run (i.e., front half and back half). DEQ may allow the substitution of zero or one-half the detection limit for each sample fraction in accordance with Appendix G of DEQ's Recommended Procedures for Conducting Toxic Air Contaminant Health Risk Assessments. If a toxic air contaminant is not detected in any source test runs or samples, you may consider the toxic air contaminant not present, and treat its concentration as zero in that portion of the risk assessment. If a toxic air contaminant is detected in 10% or more of the test runs or samples, assign a concentration of one-half the detection limit to those test runs or samples that were non-detect.

In regards to Method 29 results, average the detected values with  $\frac{1}{2}$  detection limit values for the non-detect samples, and report the final average value for use in the risk assessment. See #1 below as an example of how DEQ would allow each half of the Method 29 analytical fractions to be treated with respect to detection limits.

1. Antimony and compounds (CAS No. 7440-36-0):
  - a. Front half: detected in one sample, use  $\frac{1}{2}$  detection limit
  - b. Back half: non-detect, may use zero
2. Cadmium and compounds (CAS No. 7440-43-9): detected in three of six sample fractions
3. Lead and compounds (CAS No. 7439-92-1): detected in three of six sample fractions
4. Manganese and compounds (CAS No. 7439-96-5): detected in all six sample fractions
5. Mercury and compounds (CAS No. 7439-97-6): detected in nine of fifteen sample fractions
6. 1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin (CAS No. 39277-28-6): detected in two of three test runs

DEQ is requesting that you submit additional information to complete your Inventory. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in

part, you must comply with the requirements in OAR 340-214-0130 to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss the information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of OAR 340-245-0030(1).

If you have any questions regarding this letter please contact me directly at 503.229.5247 or [billings.kenzie@deq.state.or.us](mailto:billings.kenzie@deq.state.or.us), and I look forward to your continued assistance with this process.

Sincerely,

Kenzie Billings  
DEQ CAO Project Manager

Cc: Scott Briggs, ORRCO  
Mark Bailey, DEQ  
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Keith Johnson, DEQ  
Frank Messina, DEQ  
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