



# Oregon

Kate Brown, Governor

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July 29, 2020

Scott Briggs  
Oil Re-Refining Company dba Industiral Oils, Inc  
4150 N Suttle Road  
Portland, OR 97217

Mr. Briggs,

The Oregon Department of Environmental Quality (DEQ) received a revised source test plan from Environmental Technical Services (ETS) on behalf of Oil Re-Refining Company (ORRCO) on July 23, 2020 as required by the Cleaner Air Oregon (CAO) process. Based on our review the source test plan is approved with the following comments.

### ***General Comments***

PCB totals reporting is for all congeners, not the sum of just the congeners in OAR 340-245-8020 Table 2.

Any modifications and/or alternatives to testing methods or procedures that are implemented to satisfy DEQ testing requirements must receive approval from DEQ prior to their use in the field. Changes not acknowledged by the DEQ could be the basis for invalidating an entire test run and potentially the entire testing program.

DEQ appreciates the continued assistance with this process. The results will provide valuable information that will help us better understand emissions from the facility, and allow for completing the CAO emissions inventory. If you have any questions or concerns please contact me directly. Thank you for your continued efforts with this process.

Sincerely,

*Thomas Rhodes*

Thomas Rhodes  
DEQ CAO Source Test Coordinator

Cc: Andy Winkler, ETS  
Marie Piper, Cascade Environmental Management  
Keith Johnson, DEQ  
Kenzie Billings, DEQ  
Mark Bailey, DEQ  
Frank Messina, DEQ  
Mark Ludwiczak, DEQ  
File