



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
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June 27, 2024

Orchid Orthopedic Solutions Oregon, Inc.  
13963 S Fir St.  
Oregon City, OR 97045  
*Sent via email only*

Nathan Holwege,

This letter provides written notice to you in accordance with Oregon Administrative Rules ([OAR](#)) [340-245-0050\(1\)](#) that Orchid Orthopedic Solutions Oregon, Inc., DEQ Air Quality Source Number 03-2505, is being called in to the Cleaner Air Oregon (CAO) program. The issuance date of this letter serves as the notice date for deadline requirements in [OAR 340-245-0030\(1\)](#).

Your facility must perform a Risk Assessment in accordance with the CAO program rules adopted by the Environmental Quality Commission. This assessment will require you to provide emissions information (for example, production activities, emissions units, and control devices) that will be used, in conjunction with other data about where your facility is located, to estimate risks to the surrounding community as required under [OAR 340-245-0050\(1\)](#).

#### Next Steps:

1. Submit the CAO Pre-Application Fee form ([AQ500](#)) with payment of the Existing Source Call-In Fee by **30 days** after the issuance date of this letter, or **July 25, 2024**. [[OAR 340-245-0400\(3\)](#)] The CAO Existing Source Call-In fee associated with your Simple Air Contaminant Discharge Permit is **\$1,000.00**. [[OAR 340-216-8030 Table 3](#)]
2. Submit the CAO Emissions Inventory Form ([AQ520](#)) by **90 days** after the issuance date of this letter, or **September 23, 2024**, as identified in [OAR 340-245-0030\(1\)\(a\)](#). If you wish to perform additional source testing to complete your CAO Emissions Inventory, please contact DEQ prior to this submittal deadline, as this may affect the dates listed above.

For most facilities, this Emissions Inventory will be more detailed than previously submitted emissions information because it will include information about maximum daily emissions as well as annual average emissions. In order for DEQ to be able to approve your submission, please provide all required supplementary materials required under [OAR 340-245-0040\(4\)](#). DEQ will consider submissions incomplete if submitted without the required supporting information.

Information about the CAO Risk Assessment process and permitting, including the forms mentioned above, recommended procedures documents, and a flow chart showing the Risk Assessment process, can be found in the [Step-by-Step Guide for Facilities](#) available on the CAO web site, along with [Frequently Asked Questions](#).

DEQ is available for consultation prior to reviewing and approving submittals for the CAO process, including the Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan (if you plan to complete a Level 3 or Level 4 Risk Assessment) and the Risk Assessment itself. Once the Risk

Assessment is complete and approved, DEQ will use the Risk Action Levels identified in [OAR 340-245-8010 Table 1](#) to determine whether additional action is required under the CAO program rules.

Your contact for CAO Risk Assessment work is:

Amy DeVita-McBride – CAO Project Engineer  
[amy.devita-mcbride@deq.oregon.gov](mailto:amy.devita-mcbride@deq.oregon.gov)  
971.300.3653

Please contact DEQ to clarify any questions you may have regarding the Emissions Inventory and Risk Assessment process. We look forward to working with you.

Sincerely,



J.R. Giska  
Cleaner Air Oregon Program Manager  
971.337.4102  
[JR.giska@deq.oregon.gov](mailto:JR.giska@deq.oregon.gov)

Cc: Amy DeVita-McBride, DEQ  
Boris Barrera, DEQ  
Joshua Alexander, DEQ  
Ali Mirzakhali, DEQ