



January 10, 2025

Heather Kuoppamaki, P.E.
Project Engineer, Cleaner Air Oregon
Oregon Department of Environmental Quality
700 NE Multnomah St. Suite 600
Portland, OR 97232

Sent via email: Heather.KUOPPAMAKI@deq.oregon.gov

RE: ORRCO Portland Deadline Extension Request

Dear Heather,

ORRCO is submitting this request for an extension of the CAO emission inventory submittal deadline. The current deadline is January 28, 2025, and we would like to extend that to March 17, 2025.

We have made significant progress and on Monday we will provide process flow diagrams showing TEUs we looked at and discussed during your site visit this past Wednesday. However, we need additional time to sort and find methods to quantify the many smaller, "unique" TEUs that had not been assessed previously. Also, we need time to add to and revise the previous tank emissions calculations. The tank emissions calculations methodology has changed since we last conducted them and, as you saw, there are many tanks, including some smaller tanks not previously assessed, at ORRCO.

We will work to complete the emission inventory as quickly as possible; however, any relief you could provide would be greatly appreciated. And please let me know if you need any additional information to support our request for this deadline extension.

Thank you again for your time and help!

Best regards,

M.E. Piper

Marie E. Piper
Principal Engineer

cc: Amy Devita-McBride, ODEQ
Louis Bivins, ODEQ
JR Giska, ODEQ
Scott Briggs, ORRCO