



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
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January 13, 2025

Oil Re-Refining Company Inc.  
4150 N Suttle Rd  
Multnomah County  
Portland, OR 97217  
*Sent via email only*

Robert Calica,

On January 10, 2025, DEQ received a request from Oil Re-Refining Company, Inc. (ORRCO) for a 48-day extension of the deadline for submittal of the CAO Emissions Inventory (Inventory). ORRCO was called-in to the CAO program on October 30, 2024, with a deadline of January 28, 2025, to submit the Inventory. ORRCO hosted DEQ staff for a site visit on January 8, 2025, to discuss onsite processes and relevant Inventory requirements.

The facility requests the additional time to determine appropriate methodologies to estimate emissions from various toxic emission units (TEUs) and to update tank emission calculations using the updated TANKS model from EPA. ORRCO submitted the facility process flow diagram (PFD) on January 13, 2025.

DEQ may grant an extension based on the criteria set in [OAR 340-245-0030\(3\)](#), which require sources to demonstrate progress towards completing the submittal and show that a delay is necessary for good cause. ORRCO has demonstrated progress on the Inventory by meeting with DEQ, preparing the PFD, and documenting all the TEUs onsite. Further, DEQ agrees that a delay is necessary for ORRCO to accurately estimate emissions from many of the TEUs onsite.

For these reasons, DEQ approves ORRCO's request and grants a 48-day extension from the original submittal deadline of January 28, 2025. ORRCO's Inventory must be submitted by no later than **March 17, 2025**.

DEQ remains available to meet with ORRCO or provide feedback via email. Please contact me directly at 503-407-7596 or heather.kuoppamaki@deq.oregon.gov if you have any questions regarding this letter or CAO submittal requirements. I look forward to your continued assistance with this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Kuoppamaki', with a stylized flourish at the end.

Heather Kuoppamaki, P.E.  
CAO Project Engineer

Cc: Scott Briggs, ORRCO  
Marie E. Piper, Cascade Environmental Management  
J.R. Giska, DEQ  
Amy DeVita-McBride, DEQ  
Louis Bivins, DEQ  
Lisa Ball, DEQ  
File