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April 28, 2025



Oregon Department of Environmental Quality
Attn: Amy DeVita-McBride, Cleaner Air Oregon Project Engineer
700 NE Multnomah St., Suite 600, Portland, Oregon 97232 - 4100

RE: 30-day Extension Request
Orchid Orthopedic Solutions Oregon, Inc.
13963 S Fir Street, Oregon City, OR 97045

Amy DeVita-McBride:

On behalf of Orchid Orthopedic Solutions Oregon, Inc. (Orchid), we are requesting a 30-day extension of their deadline to respond to Cleaner Air Oregon's (CAO) comments dated March 18, 2025. This delay is being requested for good cause as the extra time will allow Orchid to address changes in operations and to perform multiple evaluations needed to respond to comments with more accurate or new data.

As a demonstration of progress, Orchid will be able to respond to the following CAO Specific Comments before the current May 19, 2025 due date.

- Comment #1 - provide CAO with process flow diagrams.
- Comment #2 - Provide ODEQ with alloy composition data (note, this information will be marked Confidential Business Information).
- Comment #3I (Parts Cleaning TEU) – Provide a reference for the source of compositional information for the "Isopropyl Alcohol" material in Column H of Worksheet 5.
- Comment #3p(i, ii, and iii). No longer applicable. As a note, the KOLENE TEU has been eliminated (last emissions January 2025). The associated Viron Horizontal Scrubber (control device SCRUBBER) is also in process of being taken offline (June 2025) and will be removed from the list of control devices.
- Comment #9a-c - provide CAO with the additional SDSs as requested.

Work on the 14 pages of comments from CAO is ongoing. Many of the comments require updates to AQ520 which will be submitted once all updates are complete. Orchid has internally assigned tasks and responsibilities to complete this work and will engage CAO with any questions related to any of the comments still being addressed as they arise.

Environmental and Natural Resource Consulting

Additionally, Orchid will continue to submit to CAO any additional stand-alone items as they are completed.

Please let us know if this 30-day extension is approved. If you have any questions about this request, please do not hesitate to phone me. Thank you for considering this extension request.

Kind regards,

EVREN Northwest, Inc.

A handwritten signature in blue ink, appearing to read 'Lynn Green'.

Lynn Green, C.E.G.
Principal Engineering Geologist

CC: Nathan Holwege, **Orchid Orthopedic** (sent electronically)