



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Agency Headquarters

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May 1, 2025

Orchid Orthopedic Solutions Oregon, Inc.
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Oregon City, OR 97045
Sent electronically only

Nathan Holwege,

Orchid Orthopedic Solutions Oregon, Inc. (Orchid Orthopedics) was called in to the Cleaner Air Oregon (CAO) program on June 27, 2024. Orchid Orthopedics submitted a CAO Emissions Inventory (Inventory) on November 22, 2024. In accordance with Oregon Administrative Rule [\(OAR\) 340-245-0030\(2\)](#), DEQ issued a written request on March 18, 2025, requiring additional information and a revised Inventory to be submitted by May 19, 2025. On April 28, 2025, DEQ received a request from Orchid Orthopedics for a 30-day extension to submit the Inventory and supporting information by no later than June 18, 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. DEQ understands that Orchid Orthopedics has demonstrated progress on the Inventory by meeting with DEQ on April 1, 2025, and identifying items from DEQ's request which can be submitted by the original due date of May 19, 2025. DEQ agrees that an extension would allow Orchid Orthopedics to better address all DEQ's comments.

For these reasons, DEQ approves Orchid Orthopedics' request and grants a 30-day extension from the previous submittal deadline of May 19, 2025. Orchid Orthopedics' Inventory and all requested information must be submitted by no later than **June 18, 2025**. The original submittal deadline of **May 19, 2025** remains for responses to the following Specific Comments from DEQ's March 18, 2025 letter:

1. **Process Flow Diagram:** Provide a copy of the facility's process flow diagram which meets the requirements of [OAR 340-245-0040\(4\)\(b\)\(C\)\(i\)](#). The process flow submitted with the Inventory is a text-based flow document which, while useful, does not fulfill the requirements.
2. **Alloy Composition Data:** DEQ requests that more refined alloy compositional information be provided for the purposes of developing the Inventory. Batch sheets or alloy specification sheets provided by the supplier should be used over SDS sheets for the alloys.
 - a. Provide DEQ copies of this compositional information for review. If this information is considered Confidential Business Information (CBI), follow appropriate CBI protocols when submitting these documents.
 - b. Update TAC emission estimates for all TEUs which use alloy compositional data. Specific instances are identified below in Specific Comment 3.
9. **Safety Data Sheets:** The SDSs for some materials were either missing or the copies provided were incomplete in the initial submittal. Provide SDSs for the following materials:
 - a. P-255 Liquid Compound (U-014) – incomplete in initial submittal;
 - b. Caustic Potash (M-1136) – missing in initial submittal; and
 - c. ER70S-6 MIG Welding rod – missing in initial submittal.

DEQ remains available to meet with Orchid Orthopedics or provide feedback via email. Please contact me directly at (971) 300-3653 or amy.devita-mcbride@deq.oregon.gov, if you have any questions regarding this letter or CAO submittal requirements, and I look forward to your continued assistance with this process.

Sincerely,

Amy DeVita-McBride
Cleaner Air Oregon Project Engineer

Cc: Lynn Green, EVREN Northwest Inc.
Lisa Simmons, EVREN Northwest, Inc.
Boris Barrera, DEQ
Joshua Alexander, DEQ
Heather Kuoppamaki, DEQ
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