



December 16, 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 #2r

Dear Heather,

ORRCo is submitting this update and a request for an extension of the CAO emission inventory response deadlines of December 31, 2025. We would like a second extension so a sampling plan can be discussed with you and then sampling and analyses performed to address the speciation needs for the emission inventory. There are several TEUs that may need more accurate characterization and then subsequent emissions calculations to be performed. Our work looking into this has been ongoing with many references and documents reviewed in hopes of finding representative speciation information. The speciation data found this far is for pure substances and ORRCo is a re-refiner of used oils and related materials. Hence, we would like to sample various TEUs and had hoped to work with you to determine the best path forward before developing a specific sampling plan. We have spent many hours researching, and we believe the sampling is needed to obtain "more accurate or new data" as may be allowed, and intended, under OAR 340-245-0030(3)(b) requirements. At this time, we anticipate TEU sampling that would impact/address Items 2d, 16, and 17 of the July 16, 2025 letter.

Additionally, ORRCo is in the midst of enhancing the Hydrocarbon Absorption Unit (HAU) and revisions need to be made relating to HAU TEUs. This also impacts the VSEP downstream of the HAU. (Items 22 and 23 of the July 16, 2025 letter.) The extension to address "changes in operations" may be allowed under OAR 340-245-0030(3)(b) requirements.

Meanwhile, all other items in both letters have been, or are expected to be, addressed by the current December 31st deadline. You'll find an updated AQ520 workbook, a separate worksheet listing the work done in relation to your two information request letters, and the SDSs for the welding operations. Additionally, the CWT-1A sampling results can be found uploaded to the

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YourDEQ server for this facility. This substantial progress in responding to both letters should meet the intended OAR 340-245-0030(3)(a) requirements.

We are requesting an extension to February 13, 2026 to conduct sampling for more accurate speciation purposes, to more accurately depict the enhanced HAU/VSEP units, and to update the emissions calculations accordingly.

As presented above, we believe we meet the criteria for being granted another extension and do appreciate your help and consideration. If there are any concerns with continued progress being made and meeting the February 13th requested deadline, I am open to weekly conference calls to review the work done and the steps moving forward to meet the new deadline. We understand the importance of deadlines with this process; but, we also wish to provide an accurate representation of the unique emissions/TEUs at ORRCO.

Thank you for your time, help, and understanding.

Best regards,

M.E. Piper

Marie E. Piper
Principal Engineer

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