



Oregon

Tina Kotek, Governor

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December 17, 2025

Oil Re-Refining Company Inc.
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Sent electronically only

Robert Calica,

Oil Re-Refining Company, Inc. (ORRCo) was called in to the Cleaner Air Oregon (CAO) program on October 30, 2024. ORRCo submitted a CAO Emissions Inventory (Inventory) on March 17, 2025 (Your DEQ Online [YDO] submittal 65673). In accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), DEQ issued a written request on July 16, 2025, requiring additional information and a revised Inventory to be submitted by September 15, 2025. On August 25, 2025, ORRCo submitted a revised Inventory and a partial response to DEQ's July 16, 2025 request, along with a request for an extension of the deadline to address the remainder of DEQ's request by no later than December 31, 2025. DEQ issued another written request on October 23, 2025, requiring additional information and revisions to the Inventory to be submitted by the December 31, 2025, deadline. On December 16, 2025, DEQ received a request from ORRCo for an additional 44-day extension of the deadline for submittal of a subset of the information requested by DEQ and the revised Inventory.

ORRCo proposes to conduct sampling to obtain site-specific Toxic Air Contaminant (TAC) speciation for various materials processed onsite and to complete an upgrade to the Hydrocarbon Absorption Unit (HAU). Modifications to the HAU also impact the downstream VSEP (nano-filtration unit). ORRCo's requested extension is for the following comments from DEQ's July 16, 2025, letter:

2. Provide detailed information so that DEQ can confirm the emission estimates, including the following:
 - d. If using particulate matter (PM) or volatile organic compound (VOC) emission factors as the basis of the toxic air contaminant (TAC) emission factors, provide documentation, such as laboratory data or published reference data, to support the TAC speciation.
16. Solidifying Half Tank TEU (HT3): HT3 is listed as an exempt TEU on Worksheet 2 of the AQ520 form. The TEU description provided in Column G is not sufficient to justify the exempt TEU request. Update the Inventory to include emissions from HT3 or provide justification for the exempt TEU determination.
17. Solids Hopper TEU (SH1): SH1 is listed as an exempt TEU on Worksheet 2 of the AQ520 form. The TEU description provided in Column G is not sufficient to justify the exempt TEU request and the process appears likely to emit TACs as it handles solids prior to TEU HT3. Update the Inventory to include emissions from HT3 or provide justification for the exempt TEU determination.
22. Provide additional information on the VSEP unit, including if the unit vents to the atmosphere and any engineering testing conducted on this unit. Evaluate the VSEP for potential TAC emissions and update the Inventory as appropriate to include this equipment as a TEU. If ORRCo

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believes this is not a source of TACs or should be considered an Exempt TEU, provide justification, with supporting documentation for DEQ review and approval.

23. Include the Hydrocarbon Absorption Unit in the Inventory. This emissions unit appears likely to emit TACs. Evaluate the Hydrocarbon Absorption Unit for potential TAC emissions and update the Inventory as appropriate to include this equipment as a TEU. If ORRCo believes this is not a source of TACs or should be considered an Exempt TEU, provide justification, with supporting documentation for DEQ review and approval.

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 ORRCo has demonstrated progress on the Inventory by submitting partial information and a partially updated Inventory and limiting the extension request to a subset of the comments. Further, DEQ agrees that a delay may be necessary for ORRCo to include enhancements to the HAU and downstream VSEP in the Inventory.

For these reasons, DEQ approves ORRCo's request and grants a 44-day extension from the previous submittal deadline of December 31, 2025, for response to **comments 2d, 16, 17, 22, and 23 of DEQ's July 16, 2025 letter only**. Additional information and updates to the Inventory to address these comments must be submitted by no later than **February 13, 2026**. The original submittal deadline of **December 31, 2025** remains for responses to all other comments in DEQ's July 16, 2025 and October 23, 2025 letters.

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,



Heather Kuoppamaki, P.E.
CAO Project Engineer

Cc: Scott Briggs, ORRCo
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