



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

### Agency Headquarters

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May 20, 2026

Orchid Orthopedic Solutions Oregon, Inc.  
13963 S Fir St.  
Oregon City, OR 97045  
*Sent electronically only*

Nathan Holwege,

Orchid Orthopedic Solutions Oregon, Inc. (Orchid) was called in to the Cleaner Air Oregon (CAO) program on June 27, 2024. Orchid submitted a CAO Emissions Inventory (Inventory) on November 22, 2024 (Your DEQ Online Submittal ID 65714). 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. Orchid requested, and DEQ approved, an extension to DEQ's deadline. Orchid submitted supporting information on May 15, May 16, and May 23, 2025. Orchid submitted additional supporting information and the revised Inventory on June 17, 2025. In accordance with [OAR 340-245-0030\(4\)\(b\)](#), DEQ issued a written request on December 8, 2025, requiring additional information and a revised Inventory. Orchid submitted supporting information on January 6 and January 12, 2026; additional supporting information and the revised Inventory were submitted on February 6, 2026. DEQ issued a written request on April 16, 2026, requiring additional information and a revised Inventory by June 15, 2026. On May 15, 2026, DEQ received a request from Orchid for a 60-day extension to submit a portion of the Inventory and supporting information by no later than August 14, 2026.

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. Orchid has requested additional time to obtain an engineering design for capture of emissions from casting operations. Orchid has demonstrated progress on the Inventory by meeting with DEQ on April 27, 2026, and identifying items from DEQ's request which can be submitted by the original due date of June 15, 2026. DEQ agrees that an extension would allow Orchid time to obtain the necessary engineering designs to support a higher capture efficiency of the casting operations in the Inventory.

For these reasons, DEQ approves Orchid's request and grants a 60-day extension from the previous submittal deadline of June 15, 2026, to address Specific Comment 3.b from DEQ's April 16, 2026, letter. Orchid must submit an updated Inventory and engineering documents necessary to support the casting operations' capture efficiency by no later than **August 14, 2026**. The original submittal deadline of **June 15, 2026**, remains for responses to the following Specific Comments from DEQ's April 16, 2026, letter:

1. **Process Flow Diagram:** Submit to DEQ a revised process flow diagram (PFD) to address the following comments.
  - a. Update the emissions type for the Casting TEUs (F-75 CAST and 17-4 CAST) to be consistent with the revised Inventory. These TEUs are noted as "fugitive" emissions in the PFD.
  - b. Include the F-75 SANDBLAST TEU and 17-4 SANDBLAST TEU activities which are collected at DC6. The PFD only includes emissions from these TEUs which vent to DC3 and DC4.

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2. Review of information in Orchid's 2025 Annual Report submitted to DEQ on February 12, 2026, indicates that the facility replaced pollution control devices DC1, DC2, and DC3 in April 2025. Submit manufacturer filter specifications for these new units.
3. **Revised Inventory:** Submit to DEQ a revised AQ520 Inventory Form, along with all supporting calculations in Excel format, as well as all information required under [OAR 340-245-0040\(4\)](#). Include the following updates to the AQ520:
  - a. Per General Comment 1, Orchid should omit potential annual and maximum daily production activities and usage based on capacity unless the numbers presented represent the actual capacity. Only sources seeking to prove they are de minimis are required to assess risk at capacity.
  - c. 17-4 SANDBLAST TEU: Update the TEU Description on Worksheet 2 to more accurately reflect activities at this TEU. The Inventory describes this TEU as emissions from grinding activities.
  - d. F-75 Alloy TEUs: Update the reference for nickel and compounds (CASRN 7440-02-0) on Worksheet 3 for the following TEUs. Nickel content of alloy noted differs from that in the material's specifications.
    - i. F-75 CAST;
    - ii. F-75 CUT;
    - iii. F-75 GRIND; and
    - iv. F-75 SANDBLAST.

DEQ remains available to meet with Orchid or provide feedback via email. Please contact me directly at (971) 300-3653 or [amy.devita-mcbride@deq.oregon.gov](mailto:amy.devita-mcbride@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,



Amy DeVita-McBride  
Cleaner Air Oregon Project Engineer

Cc: Lynn Green, EVREN Northwest Inc.  
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