

December 1, 2021

BY EMAIL

Kenzie Billings (Kenzie.BILLINGS@state.or.us)
Air Toxics Project Manager
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232

Re: Response to Cleaner Air Oregon Supplemental Information Request

Dear Kenzie:

PCC Structural is currently preparing responses to your letter request for information dated October 19, 2021. The letter asked that we provide you with supporting data related to the Large Parts Campus emissions inventory. While we anticipate meeting the deadlines outlined in the letter for most of the items, we expect that at least two items (2.d.iii and 3) will require additional time beyond the December 15th deadline to prepare our response.

Item 2.d.iii requests additional data to support the assumption that “... smoke represents 1% of the total mass of hot top used.” PCC is assessing different means to justify the percentage loss on ignition resulting from the application of hot top during the casting processes. One promising means of assessing emissions is to conduct a bench scale test. However, designing a bench scale test capable of measuring the trace amounts of emissions has proven to be difficult, so PCC is requesting an extension of the due date.

Item 3 requests the submission of SDSs for DEQ review. PCC is going to great lengths to assess the SDSs and present them in a manner that is protective of our confidential business information. This requires multiple levels of senior review. This process cannot be completed by December 15 and so I am also requesting an extension for this response.

I shall be out of the office starting December 16th and returning to the office on January 3rd. Many other key employees will be out of the office for a similar period. As a result, I am requesting that we be allowed until January 21st to respond to these two items. Although PCC expects to otherwise meet the December 15th deadline, there are responses to other items in the letter that have not been completed at the time of this request. If it appears that any other responses will not be complete by the 15th, I request the ability to amend this request to seek additional time for those items. My hope and expectation at this time is that delay in responding to any other questions besides the two identified above will not be necessary, but it is impossible

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to be certain until the responses are complete. I shall notify you at the earliest opportunity if any other responses look to be delayed.

Thank you for your consideration of this request. I look forward to hearing back from you soon.

Very truly yours,

A handwritten signature in cursive script, reading "Sherry Uchytel".

Sherry Uchytel

cc: Bryan McCampbell
Tom Wood (Stoel Rives)
Brian Eagle (MFA)