



Oregon

Kate Brown, Governor

Department of Environmental Quality

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TTY 711

December 14, 2020

Sherry Uchytel
PCC Structural, Inc.
5001 SE Johnson Creek Blvd
Milwaukee, OR 97222
4600 SE Harney Drive
Portland, OR 97206

Re: Response to Cleaner Air Oregon Supplemental Information Extension Request

Ms. Uchytel,

On October 19, 2021, DEQ formally requested supporting information and materials needed to complete the review of the Emissions Inventory submitted by Precision Castparts for their Large Parts Campus (PCC Structural) for the purposes of completing a risk assessment for the Cleaner Air Oregon (CAO) program. In this request, DEQ required that supplemental information be provided by December 15, 2021, and source testing be completed by January 31, 2022. DEQ received a Baghouse Testing Conceptual Plan from PCC Structural on December 3, 2021, that is currently in review. DEQ will continue to work with PCC Structural to prepare for upcoming source testing.

On December 1, 2021, PCC Structural requested an extension to provide part of the information requested by no later than January 21, 2022; specifically, items (2.d.iii) and (3) of DEQ's information request made on October 19, 2021. These items are summarized below with PCC Structural's justification for an extension:

2.d.iii: Emissions estimates made on a percentage of usage basis must be accompanied by supporting data or engineering testing for the following comment: *"Hot Top is the "molten metal insulation" applied after casting. The purpose of the hot top is to melt and create an insulative layer on openings in the mold after casting by way of a thermite reaction. Some smoke is generated by the instantaneous reaction, and it is conservatively estimated that this smoke represents 1% of the total mass of hot top used."*

PCC Structural's Response: PCC Structural is assessing different means to justify the percentage loss on ignition resulting from the application of hot top during the casting processes, and designing a bench scale test capable of measuring the trace amounts of emissions has been a challenge. PCC Structural is requesting to extend the due date for this requested information to January 21, 2021.

3: Please provide information regarding alloys and Safety Data Sheets (SDSs) claimed to be Confidential Business Information by December 15, 2021.

- a. Alloy composition data, including specific alloy contents
- b. Autoclave & Wax Reclaim engineering testing data/bench scale report(s)
- c. Wax SDSs
- d. Acid Etch Line SDSs
- e. Welding rod, wire, etc. SDSs
- f. Titanium alloy composition data, including specific alloy content(s)

26-1867 PCC Structural, Inc.

PCC Structurals Response: PCC Structurals is assessing the SDSs and working to determine how to present this information in a manner that is protective of confidential business information. This requires multiple levels of senior review and cannot be completed by December 15.

PCC Structurals also made a general request to have the ability to amend this extension request for items not currently specified therein, but that may not be completed and submitted by PCC Structurals by the December 15, 2021 deadline. DEQ cannot grant an extension for additional items unless they are explicitly requested in accordance with OAR 340-245-0030(3).

Therefore, DEQ grants an extension as requested for items (2.d.iii) and (3) from DEQ's October 19, 2021 letter, with the following conditions:

1. PCC Structurals must provide a progress report on December 15, 2021 detailing:
 - a. Which means to justify the percentage loss on ignition resulting from the application of hot top during the casting processes are being considered, including proposed testing method(s), and
 - b. What information on SDSs is considered confidential, and an update on which methods of providing the confidential business information are being considered.

Please contact me directly at (503.229.5247, billings.kenzie@deq.state.or.us). We look forward to your continued assistance with this process.

Sincerely,

Kenzie Billings
DEQ CAO Project Manager

Cc: James Raspen, PCC Structurals
Bryan McCampbell, PCC Structurals
Tom Wood, Stoel Rives
Brian Eagle, MFA
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