

January 27, 2023

J.R. Giska
Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Re: Response to DEQ letter dated January 18, 2023

Dear J.R. Giska:

PCC Structural, Inc. (PCC) received your letter dated January 18, 2023 (“the letter”) in which you request that we submit a Source Test Plan by January 31, 2023 and complete source testing by March 2, 2023. As you and I discussed, PCC’s long time employee who has overseen our Cleaner Air Oregon efforts since their inception retired at the end of 2022. As a result, we are in the process of hiring and onboarding a new person to oversee these efforts. This person will have a steep learning curve as she takes over this critical role. In addition, our existing environmental staff are in the middle of our reporting season when data must be compiled from the prior calendar year and assembled into reports submitted to our regulatory authorities. For these reasons, and as more fully explained below, I am requesting an extension to the deadlines stated in your letter.

PCC’s Large Parts Campus (LPC) was called into the Cleaner Air Oregon program in late 2019. Since that time we have expended thousands of person-hours preparing our emissions inventory, meeting with DEQ, responding to questions and preparing the requested submittals. In every phase we have worked hard to ensure that we provide expedited responses to DEQ. This includes submitting the Baghouse Testing Conceptual Plan – Revision 1 on March 4, 2022. Your January 18, 2023 letter responding to our conceptual plan provided clear guidance for which we are appreciative. We fully expect to be able to work with our stack testing vendors to develop a Stack Test Plan and ultimate testing event consistent with that direction. However, setting aside the staffing issues outlined above, we do not have a stack testing company identified or accredited in our system for this round of testing. We are required to seek multiple proposals, choose a contractor, and then get the chosen contractor entered into and approved within our system. Keep in mind that as a defense contractor we have strict contracting requirements and identifying and qualifying a vendor to perform work in our manufacturing areas takes a significant amount of time. Once under contract, the Source Test Plan will be developed by the selected stack testing firm. No reputable stack testing company has the quantity of time needed for the amount of stack testing identified in your letter prior to March 2, 2023. For these reasons, we are unable to provide a Source Test Plan less than two weeks after receiving your letter. Nor are we able to complete the multi-week testing event within 6 weeks of receipt of your letter. It is simply not possible even if we were not in the midst of a significant staffing shift and in the middle of our reporting season.

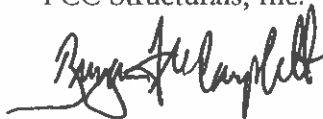
While PCC is unable to meet the deadlines suggested in the letter, I want to propose for your consideration a schedule that meets DEQ's and PCC's need to move the Cleaner Air Oregon process along expeditiously. We have consistently demonstrated progress in completing our submittals (including submittal of the Conceptual Plan last March). For the reasons stated above, a delay is necessary for good cause in order to perform this additional analysis. Therefore, I propose the following milestones leading up to completion of the LPC baghouse testing:

- PCC will issue a request for quote (RFQ) to potential stack testing firms by February 8, 2023 based on the Baghouse Testing Conceptual Plan – Revision 1 and DEQ's comments.
- PCC will select a stack testing firm, have them qualified as a vendor in PCC's accounting system, and notify DEQ of the selection within three weeks of receiving RFQ responses from potential stack testing firms.
- PCC will request selected firm prepare a detailed Source Test Plan to be submitted to DEQ within three weeks of firm selection.
- PCC will request that the selected stack testing firm complete testing no later than June 30, 2023. Testing dates will of course depend on stack testing firm availability. If necessary, PCC may request an extension on this deadline.

Responses to items 1, 2, 3, and 5 in the letter will be incorporated into the Source Test Plan, which will be prepared by the selected stack testing firm. Regarding item 4, PCC will take reasonable action to plan production on the days of testing to achieve a representative maximum loading rate to the baghouses being tested.

I appreciate the DEQ's consideration of our current circumstances when reviewing the timeline proposed above. Please let me know if you have any additional questions.

Sincerely,
PCC Structurals, Inc.



Bryan McCampbell
Division Environmental Manager

cc:

David Graiver (DEQ)
Thomas Rhodes (DEQ)
Tom Wood (Stoel Rives)
Brian Eagle (MFA)