



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

### Agency Headquarters

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February 9, 2023

Bryan McCampbell  
PCC Structural, Inc.  
5001 SE Johnson Creek Blvd  
Milwaukee, OR 97222

Re: Response to Cleaner Air Oregon Baghouse Testing Extension Request from January 27, 2023

Bryan McCampbell,

On January 18, 2023, DEQ issued a comment letter providing revisions to the source test plan and requiring that a revised source test plan, incorporating those revisions, be submitted by January 31, 2023. This letter also required PCC Structural, Inc. Large Parts Campus (PCC-LPC) to perform the source testing by no later than March 2, 2023. On January 27, 2023, PCC-LPC requested an extension to complete source testing and provided the following information:

1. The environmental staff that had been working with DEQ on completing the Cleaner Air Oregon (CAO) risk assessment process is no longer an employee of PCC-LPC.
2. An outline of the procurement process that PCC-LPC is required to adhere to as a defense contractor when selecting a source testing firm.
3. PCC-LPC proposed a timeline for completion of the required source testing as follows:
  - a. PCC-LPC 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 from the January 18, 2023 letter.
  - b. PCC-LPC will select a stack testing firm, have them qualified as a vendor in PCC-LPC's accounting system, and notify DEQ of the selection within **three weeks** of receiving the RFQ responses from potential stack testing firms.
  - c. PCC-LPC will request selected firm to prepare a detailed source test plan to be submitted to DEQ within **three weeks** of firm selection.
  - d. PCC-LPC will request that the selected stack testing firm complete testing no later than **June 30, 2023**.
4. Responses to items 1, 2, 3, and 5 in DEQ's January 18, 2023, comment letter will be incorporated into the revised source test plan from (3)(c) above.
5. PCC-LPC will take reasonable action to plan production during the testing to satisfy item 4 from DEQ's January 18, 2023, comment letter.

DEQ appreciates the thorough review of comments from the January 18, 2023, comment letter, and the establishment of a timeline for meeting source testing requirements. Additionally, PCC-LPC has already communicated to DEQ that an RFQ has been issued by February 8, 2023, as indicated in (3)(a) above. For these reasons DEQ approves this extension request, allowing for an extension of source testing by no later than **June 30, 2023**, with the following conditions:

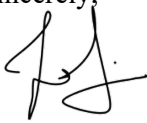
1. Upon selection of a source testing firm and notification of DEQ, as proposed in (3)(b) above, PCC-LPC will schedule a meeting with DEQ, and the selected source testing firm, prior to submittal of a source test plan, as proposed in (3)(c) above to ensure all DEQ requirements are satisfied.

26-1867 PCC Structural, Inc.

2. Upon approval of the source test plan, PCC-LPC shall meet, at least, monthly for regular progress check-ins with DEQ to ensure timely source testing, as well as, to work through remaining issues with the CAO Emissions Inventory.

Please contact me directly at 971.337.4102, or [JR.giska@deq.oregon.gov](mailto:JR.giska@deq.oregon.gov), if you have any questions. We look forward to your continued assistance with this process.

Sincerely,



J.R. Giska  
DEQ CAO Program Engineer

Cc: James Raspen, PCC Structural  
Tom Wood, Stoel Rives  
Brian Eagle, Maul Foster & Alongi  
Amy DeVita-McBride, Maul Foster & Alongi  
David Graiver, DEQ  
Thomas Rhodes, DEQ  
File