



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
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June 3, 2020

Sherry Uchytel
PCC Structural, Inc.
4600 SE Harney Drive
Portland, OR 97206

Re: Follow-Up to Cleaner Air Oregon Emissions Inventory Information Request

Ms. Uchytel,

On March 17, 2020, the Oregon Department of Environmental Quality (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-LPC) on January 2, 2020. In this request, DEQ included tables of specific comments requesting supporting information and materials.

On March 25, 2020, DEQ spoke with PCC-LPC on a conference call to discuss the feasibility of providing the requested information by the May 1, 2020 due date. On April 1, 2020, DEQ and PCC-LPC discussed a phased approach to providing the requested information. On April 8, 2020, PCC-LPC announced plans to temporarily shut down facility operations at PCC-LPC beginning April 20 and lasting through May 3. Significant facility resources were allocated to facility shutdown and startup activities, and on April 10, PCC submitted a formal extension request with a proposed phased schedule to submit the information DEQ requested in its March 17 letter.

DEQ requested supplemental clarification to the formal extension request in a meeting with facility representatives on April 28, 2020. PCC-LPC provided additional clarification on May 7, 2020.

DEQ approves the following updated submittal schedule:

Submittal Date	Deliverable	Notes
June 15, 2020	Process flow diagrams and corresponding site diagrams	Include Toxics Emission Units (TEUs) as defined in OAR 340-245-0020(60), including all significant and aggregate TEUs. Where applicable, indicate TEU emission points (e.g., exhaust stack, control device, fugitive) with an identification distinctly separate from the TEUs. Exact spatial coordinates of emission points and designation of where they are on site diagrams shall be submitted no later than the modeling protocol phase of the CAO risk assessment.

	Baghouse dust analysis reports referenced in 2018 and PTE emissions estimates	Include baghouse dust analysis reports citing metal percentages reported in supporting TAC emission estimates.
	Supporting data for control efficiencies reported	Submit this information to the extent possible by June 15, 2020, including manufacturer testing data, source testing data, input process activity, or production activity being controlled by the control device in order to accurately apply control efficiencies. Provide justification for the delayed submittal of DEQ requested data you cannot provide by this date.
	Testing data used to develop emission factors	Submit this information to the extent possible by June 15, 2020. If bench scale testing data, source testing data, and other testing data used to develop the Emissions Inventory is not available at this time, explain why the data is not available, and provide the earliest available date to submit this information.
	Supporting information for quantity and types of TACs emitted from autoclave and wax reclaim	Submit this information to by June 15, 2020. If bench scale testing data used to develop your Emissions Inventory is not available at this time, explain why the data is not available, and provide the earliest available date to submit this information.
	Burnout oven emission testing results used in developing emissions inventory	Provide supporting data used to develop TAC emission factors reported. For any data not provided, explain why the data is not available, and provide the earliest available date to submit this information.
August 28, 2020	Due date for submitting remainder of materials	Provide analytical data, production data, supporting calculations and determinations, waste manifests, manufacturer and performance data, facility-provided information, and other previously requested data used in emissions calculations that has not yet been submitted. Provide consideration of more current, representative emission factor references for DEQ review as necessary. For any data not provided at this time, explain why the data is not available, and provide the earliest available date to submit this information.
October 30, 2020	Due date for any submittals requested in March 17, 2020 DEQ letter not previously submitted	Provide remaining data not previously submitted for DEQ review.

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: Keith Johnson, DEQ
J.R. Giska, DEQ
Steve Dietrich, DEQ
Dave Graiver, DEQ
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