

May 7, 2020

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

Dear Kenzie:

Please accept my apologies for having to miss the April 28 conference call. As you know, PCC Structurals' (PCC) Large Parts Campus was shut down and staff were furloughed. There were very tight restrictions regarding what could be done while on furlough.

I understand that the call was in follow-up to our prior conference calls and my April 10, 2020 letter requesting a submittal deadline extension consistent with OAR 340-245-0030(3). That letter was in response to our conversations concerning the March 17, 2020 information request and the list you subsequently emailed me identifying your highest priority items. One of those high priority items that we had committed to provide you in the first portion of our response was a set of process flow diagrams (PFDs). You had requested additional detail about the PFDs that we intend to submit on or before June 15.

As I understand was discussed on April 28th, we recognize that you are looking for PFDs that provide adequate detail for you to be able to associate the spreadsheet entries with specific equipment and steps in the process. We anticipate that we will be able to give you quite a bit of detail that will allow you to much better understand our processes and how they relate to the emissions inventory. (for example, we will provide TEU IDs, how the TEUs vent, control devices, category of emission sources venting to individual baghouses, site diagrams showing departments) What we expect will likely not be spelled out in the PFDs are the physical locations of every emission point and designation of where they are on site diagrams. That information is extremely complex given the way our process is laid out. We are working towards having that information for the modeling protocol but did not want to delay sharing the PFDs with you in order to gather that additional detail. I believe that you indicated on the April

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28 call that this was not a problem. All said, we anticipate that we will be able to provide you with quite a bit of information to orient you better to our facility and regulated processes.

We recognize that it is in all our best interests to ensure that you have a good understanding of our facility, and we are working hard to provide PFDs that provide you the information you need. Once you have a chance to review our submittal, please contact me and we can set up a call to go over any questions you might have.

Very truly yours,

Sherry Uchytil

PCC Structurals, Inc.

Division Environmental Affairs

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cc: Bryan McCampbell

Bryan Trotter

Tom Wood (Stoel Rives)

Brian Eagle (MFA)