

August 26, 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

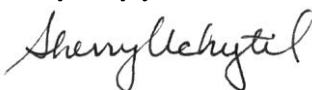
Dear Kenzie:

Thank you for talking with us earlier today about our emissions inventory submittal. By letter dated August 4, 2020, you provided PCC a supplemental information request with a due date of September 3, 2020. That request asked that we provide you with several things including a revised emissions inventory.

As you know, two highly complex emissions inventories were submitted as part of the Cleaner Air Oregon program: a 2018 actual emissions inventory, and a potential to emit emissions inventory. Any changes to one of the two inventories will have similar, but not necessarily identical, impacts on the other. In order to approach your request in the most careful and efficient manner, we request your approval of a staged submittal of the inventory documentation. By September 3rd, we would submit the revised potential to emit inventory (along with the other requested materials). We would then await DEQ's comments on the potential to emit inventory. After resolution of the comments on the potential to emit inventory, we would submit a 2018 inventory utilizing the approaches finalized for the potential to emit inventory. As we cannot be certain whether or to what extent you will request changes to the potential to emit inventory we will submit on the 3rd, we propose to develop a mutually agreeable submittal schedule for submittal of the 2018 inventory once we have resolved the potential to emit inventory.

Thank you for your consideration of this request. I look forward to hearing back from you soon.

Very truly yours,



Sherry Uchytel

cc: Bryan McCampbell
Tom Wood (Stoel Rives)
Brian Eagle (MFA)