

April 10, 2020

**BY EMAIL**

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Air Toxics Project Manager  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
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**Re: Response to Cleaner Air Oregon Emissions Inventory Information Request**

Dear Kenzie:

PCC Structurals (PCC) received your letter dated March 17, 2020 requesting that we respond to various comments on the emissions inventory submitted January 2, 2020. As you explained in our subsequent telephone calls and emails, the Department would like to have a schedule for what we intend to submit and on what timeline. To assist us in developing that schedule, you supplied me with a list of your top priority items. Based on that list, we have prepared the following schedule with an eye towards getting you your highest priority items first.

During our last phone call, we indicated that we would be able to submit responses to some of your questions on May 1, with additional answers being provided on July 31 and September 30. Since that time, our circumstances have changed significantly, with an announcement by management on April 8<sup>th</sup> that the Large Parts Campus (LPC) will essentially be shut down beginning April 20 and lasting through May 3. A vast amount of preparation goes into shutting down our operations which are designed to be operated continuously. Similarly, there will be a substantial focus required to restart all of the processes and associated controls once the shutdown is over. As a result, we anticipate there being extremely limited capacity to address your questions between now and May 18 and, even then, it will be difficult to get attention from people working in production areas. Based on these changed circumstances, we are proposing to submit, at a minimum, the following materials by the deadlines stated below.

<b>Submittal Date</b>	<b>Deliverable</b>	<b>Notes</b>
June 15	Process flow diagrams and corresponding site diagrams	While we will make every effort to make these PFDs comprehensive, not all detail specified in your letter will be able to be included in the response. The remainder of information will accompany the modeling protocol.
	Baghouse dust analysis reports referenced in 2018 and PTE emissions estimates	
	Supporting data for control efficiencies reported	To extent possible—some may follow later
	Any testing data used to develop emission factors	Bench scale testing may take longer to gather
	Supporting information for quantity and types of TACs emitted from autoclave and wax reclaim	Bench scale testing may take longer to gather
	Original analytical data presented in Table D2 of submittal	This is the baghouse dust referenced above
	Burnout oven emission testing results used in developing emissions inventory	
August 28	Target date for submitting remainder of materials	
October 30	This is our deadline for anything we cannot get to you by 8/28	

Obviously, the ability for PCC to respond to your requests has been and will continue to be severely impacted by COVID-19 and the requisite social distancing policies imposed by the Governor. At this time, I do not see any reason we cannot meet the schedule outlined above, but a month ago I could not have foreseen the plant shutdown announced this week. Depending on what happens locally and nationally, new obstacles may present themselves. We will be in contact with you if we see the possibility of additional delays.

Kenzie Billings  
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Please let me know if you have any questions. Do not be surprised if I am slow getting back to you between now and mid-May. In the interim, please practice social distancing and stay healthy.

Very truly yours,

A handwritten signature in cursive script that reads "Sherry Uchytel".

Sherry Uchytel  
PCC Structural, Inc.  
Division Environmental Affairs

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