

January 14, 2022

**BY EMAIL**

Kenzie Billings ([Kenzie.BILLINGS@deq.oregon.gov](mailto:Kenzie.BILLINGS@deq.oregon.gov))  
Air Toxics Project Manager  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232

**Re: Cleaner Air Oregon Baghouse Testing Extension Request**

Dear Kenzie:

In your letter request for information dated October 19, 2021, the DEQ requested that PCC Structural perform “representative source testing of baghouses by January 31, 2022 to verify assumed control efficiencies” for baghouses at the PCC Large Parts Campus. Since we received this letter, PCC and the DEQ have been working to develop an agreed-upon baghouse testing plan. We submitted a baghouse testing conceptual plan to you via email on December 3, 2021, and as a group we discussed this plan during a conference call on December 14, 2021. As of the date of this letter, the DEQ has not yet provided their approval of the baghouse testing conceptual plan. As a result, we have not been able to schedule the requested testing and will be unable to meet the testing deadline of January 31, 2022.

As previously discussed, we are not able to contract with a testing firm or schedule the testing until the overall scope of the testing is defined. The number of testing teams and days onsite needed to complete the requested testing will depend on the number of baghouses selected for testing, which also dictates the testing firms’ ability to put PCC on their testing schedule.

PCC will continue to work with the DEQ to reach an agreeable testing plan. Rather than requesting an arbitrary extension to the January 31, 2022 testing deadline, we propose the following timeline.

After the DEQ confirms the number of baghouses that will be tested, PCC will solicit bids from potential testing firms and schedule the dates on which the selected testing firm will complete the testing. PCC will notify the DEQ of the confirmed testing schedule within 21 days of the date on which the DEQ approves the baghouse testing conceptual plan.

Kenzie Billings  
January 14, 2022  
Page 2

Although PCC expects to meet the proposed schedule, our ability to review quotes and set a testing schedule also depends on the responsiveness of the stack testing firms. In addition, PCC continues to be impacted by the COVID-19 pandemic and this new surge of cases driven by the Omicron variant. If our ability to meet the proposed schedule is impacted by such things that are out of our control, I request the ability to amend this request to seek additional time as needed.

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

Very truly yours,

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

Sherry Uchytel

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