Hi Julia,

Thank you for taking the time to meet with us on September 22, 2023 to discuss the Department’s review of our updated Cleaner Air Oregon emission inventory (EI), submitted August 9, 2023. During the September 22 meeting, we understood from you that the Department’s comments were relatively minor and, in good faith, we believed we could provide a revised inventory back to DEQ within three weeks. However, we were surprised by the breadth of the Department’s two EI information request letters that we received via email on September 29th and October 3rd. These letters include challenging requests, not part of our discussion on September 22, to change our existing emission calculation methodologies and assumptions, and we are requesting additional time to provide a response. We are requesting an extension of the submittal deadline for our response to the three most complex questions (identified below) presented in the Department’s September 29 and October 3 letters.

Specifically, CSRM is requesting an extension until December 22, 2023 to prepare and submit our response to the complex questions, and to suggest alternative approaches (if appropriate) for quantifying emissions from the activities addressed by those questions. OAR 340-245-0030(3) authorizes DEQ to grant an extension to a deadline associated with an information request where (a) the owner has demonstrated progress in completing the submittal and (b) a delay is necessary to obtaining more accurate or new data, perform additional analyses, or address changes in operations or other key parameters, any of which are likely to have a substantive impact on the outcomes of the submittal.  We believe that we meet the first criterion as we are clearly demonstrating progress by continuing to engage with DEQ on the technical aspects of estimating emissions from our facility and providing information to DEQ as expeditiously as possible, responding by October 24, to items 1.a.ii, 1.a.iii, 1.b, 1.c, 1.d and 1.f.

We believe that we meet the second criterion based on the additional time needed to accurately prepare responses to the more complex questions included in DEQ’s September 29 and October 3 letters. These complex questions include: (1) DEQ’s request to use a three-side enclosure particulate control factor based on grain handling operations and apply it to our metal alloy handling operations (item 1.e), (2) use of an unadjusted “drop equation” derived from aggregate handling operations and apply it to our metal scrap handling operations (item 1.g), and (3) estimating fugitive hydrogen fluoride emissions for allocation to TEU EU-3 (item 1.a.i.). Responding to these complex questions will require considerable effort, particularly as DEQ’s information request letters include references to technical literature that requires our further evaluation, and could require us to develop additional, site-specific information. Therefore, we believe that we meet both the letter and the intent of the rule, and the requested extension is appropriate.

We appreciate your consideration of this request. Please let me know if you have any questions.

Best Regards,

Jim Spahr

EHS Director

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