

5/28/2024

**Via E-mail ([heather.kuoppamaki@deq.oregon.gov](mailto:heather.kuoppamaki@deq.oregon.gov))**

Heather Kuoppomaki, P.E.  
Cleaner Air Oregon Project Manager  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232

**RE: Response to Cleaner Air Oregon Information Request**

Dear Heather:

PCC Structurals (PCC) and Maul Foster & Alongi, Inc. (MFA) are currently developing responses to your letter request for information dated April 25, 2024. The letter asked us to provide additional supporting data related to the Large Parts Campus emissions inventory, with an initial due date of June 24, 2024, for items 1 through 10. While we anticipate meeting the proposed deadline for most of the items (items 2 through 10), we expect that item 1 will require additional time beyond the June 24<sup>th</sup> deadline to prepare our response.

As you are aware, both PCC and MFA have experienced turnover this year among staff who had previously been instrumental in the Cleaner Air Oregon (CAO) process. This turnover has affected our capacity to simultaneously support both existing regulatory reporting deadlines and requests for information, alongside the regular internal demands placed on PCC's environmental team. While we understand the importance of your information request, it is imperative to recognize that PCC is also subject to air quality reporting deadlines of July 1<sup>st</sup> for both Toxics Release Inventory reporting and Cleaner Air Oregon triennial air toxics reporting. The July 1<sup>st</sup> deadlines apply to all of our Oregon facilities, and the team preparing these reports is the same team that is developing the response to your CAO information request.

At this time, we need to prioritize the TRI and triennial reporting deadlines with the help of MFA and other contractors, which leaves limited capacity to respond to substantive requests for information. We believe that we will be able to provide responses for items 2 through 10 of your information request by the June 24, 2024 deadline stated in your letter but will require additional time to adequately address item 1.

I am requesting that the deadline for a response to item 1 be extended to July 26, 2024. There is a substantial level of data review and analysis required to properly respond to item 1. Extending the deadline to July 26, 2024 will allow us to give this response the attention it requires, upon the completion of both TRI and triennial reporting. In the meantime, you will have responses to 9 of your 10 questions that you can be reviewing. Based on this demonstration of progress and the regulatory deadlines and staffing challenges outlined above, I hope that you agree that we meet the criteria in OAR 340-245-0030(3) for granting of extensions.

May 28, 2024

Heather Kuoppomaki, P.E.

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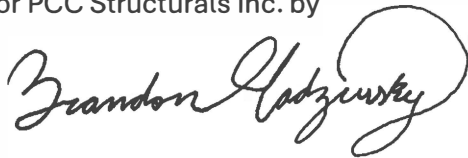
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I will notify you at the earliest opportunity if any other responses look to be delayed.

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

Sincerely,

For PCC Structurals Inc. by



Brandon Hadzinsky

Environmental Engineer

[Brandon.Hadzinsky@PCCStructurals.com](mailto:Brandon.Hadzinsky@PCCStructurals.com)

Cc: Bryan McCampbell, PCC Structurals Inc.

Tom Wood, Stoel Rives

Brian Eagle, Maul Foster Alongi

David Graiver, Oregon DEQ

JR Giska, Oregon DEQ

Julia Degagne, Oregon DEQ

Thomas Rhodes, Oregon DEQ