



March 13th, 2025

Heather Kuoppamaki, P.E.
Project Engineer
Cleaner Air Oregon, Oregon Department of Environmental Quality
700 NE Multnomah St. Suite 600
Portland OR 97232

Dear Heather Kuoppamaki

Imerys Perlite USA, Inc. ("Imerys") in Lakeview, Oregon (the "Site") was officially "called into" the Cleaner Air Oregon (CAO) program on January 2, 2025. As part of the call in process, Imerys was required to submit the CAO existing source call-in fee of \$1,030 which was officially submitted on February 2, 2025. Additionally, Imerys is required to submit a completed CAO Emissions Inventory Form (AQ520) by April 2, 2025, 90 days after the call-in letter date. In that time Imerys has taken a number of steps to develop a complete and accurate CAO emissions inventory. These steps are listed below:

- Imerys has been gathering most recent safety data sheets (SDS's) and throughputs for different maintenance and cleaning materials used at the Site.
- Imerys has been gathering most recent SDS's and throughputs for various welding materials used at the Site.
- Imerys is electing to perform a renewed inductively coupled plasma (ICP) analysis on the finished Perlite ore as well as the raw ore that is initially received at the Site. The last analysis was done in 2018, and an updated analysis would be beneficial to confirm metal and inorganic toxic air contaminants and associated weight percents found in the current product at the Site, before and after expansion in the rotary dryer. This ICP analysis would provide similar constituent information that is currently present in Imerys' existing ACDP and review report. Note that the previous analysis was solely for finished product and not the raw ore received at the site. Imerys believes testing for both will provide more accurate and complete emissions data.
- Imerys has hired an Environmental Consultant, Trinity Consultants, to help complete the CAO emissions inventory and associated risk assessment.

Imerys is requesting an extension of 60 days to the current emission inventory deadline pursuant to OAR 340-245-0030 (3) for demonstrating progress towards completing the submittal with complete and accurate information. This extension is based on the expected turnaround time for the ICP analysis per conversations with Imerys' current laboratory that is used for historic ICP analyses. Additionally, Imerys acknowledges that upon being granted a 60 day extension to the current Emissions Inventory deadline a modeling protocol and risk assessment workplan will be submitted concurrently with the emissions inventory per OAR 340-245-0030(1)(B).

Pursuant to the requirements of OAR 340-245-0030(3), Imerys is submitting this extension letter more than fifteen days prior to the current submittal deadline, the Site has made demonstrable progress on preparing the CAO Emission Inventory Form and the extension will allow Imerys to obtain the information listed above, which is expected to have an impact on the data submitted.



Ultimately, this extension will allow Imerys to ensure the submittal is complete and accurate, as well to avoid future potential revisions due to information obtained after the current deadline if not granted the extension request.

For any questions or clarification, please contact me at karon.brown@imerys.com or David Dooley at david.dooley@imerys.com.

Best regards,

Karon Brown
Imerys Perlite USA

Cc: David Dooley, Imerys Perlite USA
Greg Nostrand, Trinity Consultants
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