

June 27, 2025

Heather Kuoppamaki
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232
Re: Response to DEQ letter dated June 5, 2025

Heather,

PCC Structurals (PCC) is working on addressing the information requested in your letter dated June 5, 2025. However, the level of effort required to adequately address the information request is significant, and we will require additional time beyond the August 4th deadline to develop responses. We are therefore requesting an extension to the August 4, 2025 deadline indicated by your June 5, 2025 letter. The following is provided to help demonstrate that PCC is both demonstrating progress in completing the submittal, and that this extension is necessary for good cause, as required by OAR 340-245-0030(3).

1. PCC environmental staff have been, and are currently, dedicated to supporting other regulatory reporting deadlines, including the July 1st Toxics Release Inventory reporting deadline and July 31st semiannual reporting deadline. These represent a significant effort due to the number of facilities being supported, and this work is performed by the same staff that also support the CAO program.
2. PCC has prioritized the requested Baghouse 8901 stack testing (item 1 of the information request). Preparing for CAO stack tests at PCC is a large effort and significantly impacts production leading up to and during the test. Test runs are long (8 hours) and require careful planning with production and an onsite presence to ensure sufficient material is available to process over the duration of the tests.
3. The amount of information requested, and the level of required revision to previously submitted documents represents a significant amount of work and will require the involvement of various groups both internal and external to PCC.
4. Consultants and experts supporting PCC with the CAO program will be on extended leave between now and beyond the proposed August 4th due date. PCC relies on this outside support to develop responses to DEQs questions.

It is for the reasons stated above that we are requesting an extension to the deadline for deliverables from the June 5, 2025 information request. PCC proposes to provide responses to items that currently have a due date of August 4, 2025 within 30 days of DEQ

approving the final stack test report for Baghouse 8901. This will allow PCC to ensure that each item is adequately addressed and will prevent additional “intermediate” submittals of incomplete inventories, which would exhaust available resources.

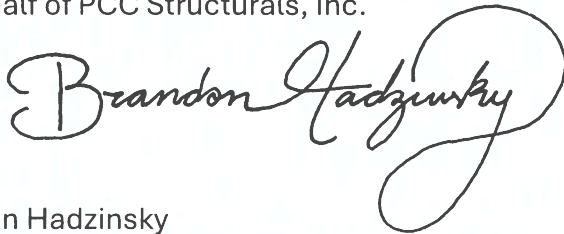
To help expedite this timeline (despite limited bandwidth), PCC promptly began working to identify a stack test firm with the soonest availability, and was able to confirm a testing window before the end of July. As a result, testing is scheduled to occur more than a month sooner than the proposed September 3, 2025 deadline. A testing protocol has already been submitted to the DEQ, and PCC will continue efforts to prepare for a successful testing campaign. Attached to this email is the list of baghouses that may be considered similar to Baghouse 8901, which satisfies item 3.iii. of the June 5, 2025 information request.

We will reach out to set up a time for DEQ to review the bench-scale test results of BURNOUT_NW_S and BURNOUT_NW_T by August 4, 2025 (item 4 of the information request).

We appreciate your consideration of this request, please let us know if you would like to have a call to discuss further.

Thank you,

On behalf of PCC Structurals, Inc.

A handwritten signature in black ink that reads "Brandon Hadzinsky". The signature is fluid and cursive, with a large loop at the end of the last name.

Brandon Hadzinsky
Division Environmental Engineer