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RE: Response to Oregon DEQ's Review of Imerys Perlite's CAO Emission Inventory

Trinity submitted the Cleaner Air Oregon (CAO) emission inventory on June 2, 2025, for the Imerys Perlite USA, Inc. (Imerys) Lakeview, OR facility. Imerys received a response from the Oregon Department of Environmental Quality (ODEQ) on August 11, 2025, regarding the CAO emission inventory. CAO inventory was revised in response to the comment letter. The comment letter's points are below in italics and the responses in bold. This cover letter serves to answer the points made in the comment letter and address where changes were made in the emission calculations.

1. *Provide the following additional information:*
    a. *A copy of the O&M plan referenced in the ACDP 19-001-SI-011.*
    A copy of each baghouse O&M plans have been added as Attachment A to this response letter for ODEQ to review.

    b. *The following SDSs were provided to DEQ but the material usage is not listed on Tab 4 of the AQ520. Please provide clarification on the usage of these materials:*
        i. *PB Penetrating Catalyst;*
        ii. *ii. Cyclo Breakaway Fast Penetrating Oil.*
    The material usage has been included for these materials on Tab 4 of the AQ520, each material is listed as exempt under OAR 340-245-0060(3)(b) as they do not contain any Toxic Air Contaminants (TAC).

    c. *For the Rotary Dryer – Used Oil Burned (TEU RDO):*
        i. *Source test reports for the Rotary Dryer referenced in Table 17 of the supporting calculations;*
        The Rotary Dryer source test report has been included as Attachment B to this response letter for ODEQ to review.

        ii. *Confirm that the used oil combusted onsite is "re-refined" used oil;*
        The oil combusted onsite has been confirmed with Imerys staff to be "re-refined" used oil.

        iii. *The entire laboratory report for the used oil. Only page 4 from the 20 total pages were provided in the supporting documentation; and*
        The entirety of the laboratory report on used oil has been provided as Attachment B to this letter response for ODEQ to review.

        iv. *Additional information on how the used oil is delivered to the site and if any used oil is stored onsite – onsite used oil storage tanks would be considered a TEU.*

The used oil is delivered to the site via trucks and there are two (2) 12,500 gallon used oil tanks onsite currently. These tanks have been added to the emission calculations and AQ520 form as TEU-Tank1 and TEU-Tank2.

d. *For the Drop Points – Active Raw Ore (drop points 1-6) (TEU DP-1):*
   i. *Additional justification for the moisture content of the raw ore; and*
   ii. *Meteorological data used to calculate average and maximum wind speed; additionally provide a discussion that includes the location, time period, and representativeness of the data used.*

The moisture content for the Raw Ore was obtained from AP-42 chapter 30.11, where a range of moisture contents is provided for crude Perlite ore and the lower end of this range, 4%, is utilized. This assumption was approved via email after discussion by ODEQ on 09/08/2025. Meteorological Data has been included as electronic Attachment C in .PFL and .SFC format to this letter for ODEQ to review. The meteorology data representativeness discussion is included as Attachment D as well.

e. *For Stockpiles (TEU AS and TEU IS), provide the meteorological data used to calculate average and maximum wind speed – provide a discussion that includes the location, time period, and representativeness of the data used.*

The same meteorological data is used for the Stockpiles as for the Drop Points and is provided as an electronic Attachment C to this letter for ODEQ to review. Attachment D provides the meteorological data representativeness discussion.

2. *Revise and submit supporting calculations to resolve the following:*
   a. *Rotary Dryer – Used Oil Burned (TEU RDO): For Table 17 of the supporting calculations, correct the source attribution for pyrene (CASRN 129-00-0) and TCE (CASRN 79-01-6) – these emission factors are from AP-42 chapter 1.11-5 and not the permit.*

The source description has been updated to the CAO re-refined oil emission factors provided by ODEQ for pyrene. TCE has been removed from the calculations as it was not listed within the provided re-refined oil emission factors. This table has been updated to Table 20 in this submission.

   b. *Drop Points – Active Raw Ore (drop points 1-6) (TEU DP-1):*
      i. *Update the emission estimates to account for six independent drop points – the activity should be multiplied by a factor of 6 to account for the separate emission points.*

The emission estimates for the drop points have been updated to account for six independent drop points by multiplying the total throughput by a factor of 6.

      ii. *Provide units for the hourly emissions and annual emissions in Table 10.*

The units have been updated for the hourly and annual emissions in Table 10.

      iii. *Update the emission estimates to calculate worst case daily emissions using the lowest moisture content and highest wind speeds, per AP-42 chapter 13.2.4.*

Emission estimates for the worst-case daily emissions using the highest daily windspeed of 28.97 mph and the lowest moisture content of 4%

have been added to the Drop Points emissions tab. The .SFC file was used to determine highest daily windspeed. An excel file with that analysis can be found in Attachment C.

iv. *Confirm the units for the amount of ore processed per activity period. The units in Tab 2 state that 262,800 pounds of ore is processed per year and 720 pounds is processed per day. The emission factors used in Tab 3 and calculations provided in the supporting calculations indicate that 262,800/720 tons of ore is processed per year/day. Please fix this discrepancy.*

The units have been updated on Tab 2 to reflect tons of ore rather than pounds of ore. The daily estimate has been updated to 800 tons/day to be reflective of a more conservative estimate of potential daily emissios as seen in the throughputs tab of the emission calculations and tab 2 of the AQ520 form.

c. *Stockpiles (TEU AS and TEU IS):*

i. *For Table 18, correct the spelling of "Emissin" to "Emission" in the title*

This table no longer exists as the acreage is measured using google earth in table 24 rather than using the permit acreage throughput.

ii. *Update the emissions estimates calculations to account for two points of emission (material handling and wind erosion). Each of these points of emission will have different average annual and maximum daily emission factors. Calculate these emission factors using the information below. Submit all calculations conducted to DEQ in Excel format:*

1. *Material Handling – use AP-42 chapter 13.2.4 equation 1 for loading/unloading the storage piles.*
    a. *Use the following to calculate the maximum daily emission factor:*
        i. *Review the rolling 24-hour historical meteorological data to determine the maximum mean daily wind speed; and*
        ii. *Unless site specific information is available, assume M (material moisture content) is 0.25%. Site specific information could include dust control such as water spraying.*

The Stockpile emission calculations have been updated to reflect material handling and wind erosion emissions separately as requested by ODEQ. Equation 1 from AP-42 chapter 13.2.4 was used to estimate material handling emissions from the maximum annual and daily hauling data maintained by Imerys Lakeview. The meteorological data provided previously was used to calculate the maximum mean daily wind speed of 28.97 mph and the material moisture content of 4% was utilized as well.

    b. *Imerys may also use the Industrial Wind Erosion methodology provided in AP-42 chapter 13.2.5. Please discuss with DEQ if Imerys would prefer to use this method.*

Imerys is using AP-42 chapter 13.2.4 equation 1 for these calculations.

2. *Wind erosion – use EPA 1988 "Control of Open Fugitive Dust Sources", Equation 4-9 for Total Suspended Particulate (TSP).*
    a. *For "s" and "f" use whole number for the percentages (for 20% use 20, not 0.20) in the calculation;*
    b. *Use the following to calculate the maximum daily emission factor:*
        i. *For maximum daily, review rolling 24-hour historical meteorological data to determine the maximum % of time wind exceeds 12 mph in a day.*
        ii. *Assume 0 for number of days with >0.01 inch of precipitation.*

Equation 4-9 in the 1988 EPA article mentioned above was used to calculate wind erosion emissions from the stockpile. The assumptions provided by ODEQ in the CAO Emission Inventory review received on 08/11/2025 were utilized as well as the meteorological data to calculate the maximum percentage of time the wind exceeded 12 mph in a day. Annual precipitation data from 1981-2010 from a local weather station (2 NNW, OR, US) was used to determine days above precipitation for the annual totals, while 0 was assumed for daily emissions. A silt content of 10% was determined using unpaved road emission factors for mining haul roads and is considered a conservative assumption for this calculation methodology, as the ore coming from the mine is coarse material before being processed. An 85% control was applied to wind erosion and material handling emissions for wetting, following the fugitive dust control plan maintained on site in order to comply with fugitive dust control requirements regulated by the permit. This control percentage is the average given for water spraying of storage piles in AP-42 Chapter 11.19.1-5.

d. *Welding emissions (TEU WELD1, TEU WELD2, TEU WELD3 and TEU WELD4):*
    i. *Include the electrode type used in Tables 4 and 5.*

The electrode type has been specified in Tables 4 and 5. Please note that the manufacturer had no information available to conclude or make a sound assumption about the electrode type for the Rocketmount Orin Flux Core material (WELD4). The Bode method has been used to calculate the emission factors when the electrode type is not known as approved by ODEQ during discussion on 09/08/2025.

    ii. *For WELD1: make the following corrections:*
        1. *Include quartz (at 3%) as respirable silica, crystalline (respirable) (CASRN 7631-86-9) or provide further documentation that the quartz in the welding rod is not respirable;*

The overall Crystaline Silica weight percent in WELD 1 was updated to include quartz with a weight percent of 3%.

        2. *Correct the maximum weight percent for aluminum oxide (CASRN 1344-28-1) from 5% to 1% to match the SDS;*

The maximum weight percent has been updated to 1% to reflect the SDS.

3. *Include aluminum oxide (CASRN 1344-28-1) on Tab 3 of the AQ520; and,*
Aluminum and compounds (CASRN 7429-90-5) has been added to Tab 3 of the AQ520 for WELD1. This TAC was utilized in place of aluminum oxide because that chemical is not present in fibrous forms as confirmed by ODEQ in a follow-up email to the discussion on 09/08/2025.

4. *Correct emission factors obtained from AP-42 Table 12.19-2. These emission factors are provided in units of 10^{-1} lb/10^{3} lb and should be converted to units of lb/10^{3} lb. This applies to the following TACs:*
    a. *Manganese (CASRN 7439-96-5) should have an emission factor of 1.03 lb/1000 lb;*
    b. *Cobalt and compounds (CASRN 7440-48-4) should have an emission factor of 0.001 lb/1000 lb;*
    c. *Nickel (CASRN 7440-02-0) should have an emission factor of 0.002 lb/1000 lb.*

All emission factors for the pollutants listed above have been corrected by converting to units of lb/10^{3} lb.

iii. *For WELD3: Include fluorides from lithium fluoride (along with fluorides from barium fluoride) in the calculation for total fluorides (DEQ Seq ID 239).*

There is no fluoride constituents present in the WELD3 material, however given the context above, WELD2 was updated to include lithium fluoride along with barium fluoride. This update was made to the welding SDS review tab in the emission calculation workbook, but the reporting threshold for fluorides is still not met and therefore WELD2 is still exempt from reporting under OAR 340-245-0060(3)(a).

iv. *For WELD4 the following TACs are listed in Section 15 of the SDS. Include these TACs or provide additional manufacturer information that these TACs will not be emitted during this welding process:*
    1. *Cobalt and compounds (CASRN 7440-48-4), and*
    2. *Chromium VI (CASRN 18540-29-9)*

Guidance was provided by the manufacturer of this product that neither of the pollutants outlined above are included as chemical constituents that make up this welding product. It was confirmed that the only constituents present in this product are those listed in section 3 of the SDS.

e. *Material Balance usage should be converted from cans/year to lb/year using material density information provided in the SDS or otherwise provided by the manufacturer. Provide supporting calculations and any additional manufacturer documentation for these conversions.*

Either the SDS, the manufacturer, or an SDS of a similar product was consulted to determine the density for each material listed under the maintenance activities. Some manufacturers considered this information proprietary, which is why similar SDSs were used to provide density information. The density was then used to calculate material balance usage for these activities. All additional supporting

documentation for the density values including the previously provided SDS's has been included as Attachment E to this response letter for ODEQ to review.

3. *Provide a revised Process Flow Diagram with the following updates in accordance with OAR 340-245-0040(4)(b)(C)(i): Include the air pollution control devices and device IDs.*

A revised process flow diagram updated in accordance with 340-245-0040(4)(b)(C)(i) has been included as Attachment F to this response letter for ODEQ to review.

4. *Provide a revised CAO Emissions Inventory AQ520 form that includes the updates and revisions required below:*
    a. *Item 7 of the 2020 Simple Air Contaminant Discharge Permit (ACDP) Review Report (19-0001-SI-01_RR_2020), states that the "A negligible amount of diesel fuel oil #2 is occasionally mixed with the used oil in order to decrease the fuel viscosity during very cold times". Please include emissions from the diesel usage, as well as any onsite diesel storage, in the AQ520 or provide supporting calculations to justify this as an exempt TEU in accordance with OAR 340-245-0060(3)(a).*

    Diesel oil is no longer mixed with fuel at this facility, however there is a diesel fuel tank located onsite for use by various loading trucks. This diesel fuel tank is a categorically insignificant TEU per *OAR 340-245-0060(3)(a)* as it is stored under ambient temperature and pressure and is only 500 gallons.

    b. *Tab 2 and Tab 4: Correct the spelling of "fugative" to "fugitive".*
    The spelling has been corrected on both tabs of the AQ520 form.

    c. *Tab 3: Correct on instance of "TEU-WELD1" that was input as "TEU WELD1" (missing the "-").*
    The input for WELD1 was corrected to TEU-WELD1 in Tab 3 of the AQ520 form.

    d. *Tab 4:*
        i. *Consider reviewing and revising the maximum daily material usage amounts. The usage amounts are equal to the annual divided by 365. This indicates that the maintenance activities are continuous operations and does not allow for daily variation. Please provide the maximum potential daily usage for these activity levels.*

        The maximum daily material usage amounts for the maintenance activities have been updated to reflect a conservative estimate of half a can of use per day. The calculation for the daily throughput, divides the annual throughput by 48, as there are 24 total cans used annually and half are used in a maximum day.

        ii. *Update usage amounts calculated in accordance with Comment 2.e.*

        The usage amounts for the maintenance activities have been updated to rely on density as suggested in Comment 2.e. within the AQ520 form.

    e. *Include fugitive emissions of the following activities or provide supporting documentation why these activities do not materially contribute to risk:*
        i. *Perlite Crushing prior to drying*

        Perlite crushing emissions prior to drying were estimated using AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral

Processing. Primary crushing per Table 11.19.2-2 does not have listed emission factors, so, per footnote n. of Table 11.19.2-2 emission factors for PM for tertiary crushers were used as an upper limit for primary crushing. Per AP-42 chapter 30.11, the raw ore moisture content is assumed to be 4%, which is wetter than the sample ores in the controlled sample ores in AP-42 Section 11.19.2, therefore the crushing of raw perlite is considered controlled. The primary scalper (the primary crushing emission unit) also contains a screen. However, emissions from the screen are considered negligible as the screen on the crusher has a screen size of 15/16", which is 5x larger than the maximum screen size sampled in the Section 11.19.2 documentation (3/16 ").

ii. Vehicles on unpaved roads

Unpaved road emissions were added to the inventory and estimated using AP-42 Section 13.2.2 Unpaved Roads. Emission factor E is calculated according to AP-42 Section 13.2.2 for emissions from unpaved roads, Equation 1a. The silt content value for a stone quarrying and processing plant road, is used because the material is a stone with similar processing types to other mined stones. The 2024 hauling manifest maintained in Imerys Lakeview's records, was used to determine average vehicle haul weight. Specifications from similar vehicles were used to determine the average weight of vehicle. An average between round trip distances between the active and inactive stockpile was used to determine Vehicle Miles Traveled.

Default AP-42 particle size multipliers and empirical constants are being used to estimate emissions. Long term particulate matter emissions account for natural mitigation due to precipitation according to AP-42 Section 13.2.2. The TAC emissions from unpaved roads are accounted for assuming that the emissions are 100% perlite for conservatism. This is an extremely conservative assumption, and testing may be conducted in the future to determine a more accurate percentage of perlite entrained on unpaved road soil.

Unpaved road controls have been implemented from Table 6-6 in the "WRAP Fugitive Dust Handbook" which includes 44% for limiting vehicle speeds to under 25 mph and 42% for water control which is the average control percent (between 10% and 74%) given under the same handbook. The overall control listed in the AQ520 form is 67.52% taking both of these control efficiencies into account. The fugitive dust control plan implemented at the site intends to control fugitive dust from unpaved roads and stockpiles and applies wetting at sufficient rates and frequency to control dust. The fugitive dust control plan is included in Attachment G.

f. Include uncontrolled emissions (not captured by the onsite baghouses) of the following activities or provide supporting documentation why these activities do not materially contribute to risk:

Uncontrolled emissions from the baghouses have been incorporated into the emission calculations and the AQ520 form. Control efficiencies were obtained from the EPA *"Air Pollution Control Technology Fact Sheet"* and used with the emission factors from the baghouse stack tests conducted at the facility to

determine uncontrolled emission factors for the air flowing through the baghouse. Using an engineering estimate on the process yield, it was determined that around 16% of onsite material is lost to either baghouse capture or through the building. This is assumed to be the potentially emitted material from these operations. Default building control efficiencies of 90% were applied to the uncontrolled emissions within the Main baghouse and the New Baghouse as approved by ODEQ.

i. *Rotary dryer*

For the Rotary Dryer baghouse the building control efficiency is 100% as this area is closed off and under negative pressure and there are no loading processes here. The combustion emissions from the rotary dryer are assumed to be directed out of the same stack as the dryer baghouse with no control which is a conservative assumption.

ii. Screening and transfer points;

Emissions from the screen are considered negligible as the screen on the crusher has a screen size of 15/16", which is 5x larger than the outlined screen size in AP-42 documentation, before the dryer. All transfer points after the dryer are controlled by the Main and New baghouses and are given as uncontrolled emissions as described above.

iii. Crushing after drying and transfer points;

Crushing after drying and transfer points are controlled by the baghouse's and the uncontrolled emissions are described above.

iv. Conveyors;

The conveyors are continuous processes and uncontrolled drop points between the conveyors are considered. All conveyors past the dryer are controlled and would be dealt with by the uncontrolled emission factors described above.

v. Silos; and

These are controlled by the Main baghouse and the New baghouse. Uncontrolled building emission factors are applied here as well.

vi. Truck and rail load-out.

These are controlled by the New baghouse. Uncontrolled building emission factors are applied here as well.

g. Rotary Dryer – Used Oil Burned (TEU RDO):

i. The ACDP 19-001-SI-011 states that the facility uses a cyclone "between the Rotary Dryer and the Rotary Dryer Baghouse". Include the cyclone in the Control Device[s] column of Tab 2 (Column C).

The Cyclone is no longer operating at the site for this facility. The rotary dryer baghouse permit emission limit (0.036 lbs PM/ton), which the emission factors are based on, is an average of 2014 and 2018 tests before and after the cyclone was originally installed (in 2016). The 2014 test, which was before the cyclone was originally installed, gave a PM emission factor of 0.027 lbs/ton. Continuing to use the current emission limit of 0.036 lbs PM/ton is considered to be conservatively representative of the baghouse in its current configuration.

ii. *If used oil is stored onsite as noted in Comment 1.c.iv, include emissions from TEU.*

Emissions from the used oil tanks noted in Comment 1.c.iv have been incorporated into the emission calculation workbook and the AQ520 form as their own TEU's. These emissions were determined using the program BREEZE TANK- ESP. The inputs and outputs of the program can be seen in the emissions calculation's workbook. Diesel was input as the stock type as the heat of combustion is similar and the oil testing data's metals would not be expected to volatilize in the tank. These make up a very small percentage of overall emissions at the site.

iii. *In Tab 3 of the AQ520 form, use the attached used oil combustion emission factors for TACs that do not have source testing data.*

Emission factors for TACs were updated in the emission calculations and AQ520 using the re-fined combustion emission factors provided by ODEQ on 08/11/2025.

iv. *In Tab 3 of the AQ520 form, include Total PCBs (CASRN 1336-36-3) at half the method detection limit (0.5 ppm, or 0.00175 lb/Mgal).*

Total PCBs were added to the emission calculations and the AQ520 form at half the method detection limit for the dryer.

h. *For the TEUs that handle perlite (TEU RBD, TEU MAIN, TEU New, TEU AS, TEU IS, and TEU DP):*

i. *The following TACs must be reported on Tab 3 for these TEUs:*

1. *Phosphorus and compounds (DEQ SEQ ID 504) using a concentration of 33 ppm;*
2. *Vanadium (CASRN 7440-62-2) using a concentration of 1.5 ppm;*
3. *Chromium VI (CASRN 18540-29-9) as 7% of total chromium (total chromium was reported at 114 ppm);*
4. *Aluminum oxide (CASRN 1344-28-1) at a weight percent of 13%; and*
5. *Molybdenum trioxide (CASRN 1313-27-5). Calculate molybdenum trioxide by multiplying the molybdenum concentration of 3.7 using the ratio of molecular weights of molybdenum trioxide to molybdenum [143.94 (g/mol)/95.95 (g/mol)].*

The TACs outlined above have been incorporated into the emission calculations and AQ520 form for the TEUs that handle perlite. Note Vanadium is already included as an elemental fraction of Vanadium Oxide (CASRN 1314-62-1). Therefore Vanadium *(CASRN 7440-62-2)* **is not included as discussed on 09/08/2025 with ODEQ. Additionally, Aluminum Oxide (CASRN 1344-28-1) is not included in this analysis as it is not present in fibrous forms. As discussed above, Aluminum and compounds is included instead.**

ii. *Fix the emission factors for the following compounds used in Tab 3. The weight percent for these compounds appear to refer to an incorrect cell.*

1. *Lead and compounds (CASRN 7439-92-1);*
2. *Antimony and compounds (CASRN 7440-36-0);*

3. *Selenium and compounds (CASRN 7782-49-2);*
4. *Thallium and compounds (CASRN 7440-28-0);*
5. *Zinc and compounds (CASRN 7440-66-6);*
6. *Barium and compounds (CASRN 7440-39-3);*
7. *Phosphorus pentoxide (CASRN 1314-56-3);*
8. *Silica, crystalline (respirable) (CASRN 7631-86-9);*
9. *Sulfur trioxide (CASRN 7446-11-9); and*
10. *Vanadium pentoxide (CASRN 13141-62-1).*

The cell references used in Tab 3 have been updated to reflect the correct weight percent for the compounds listed above.

i. *Drop Points – Active Raw Ore (drop points 1-6) (TEU DP-1):*

i. *If necessary, as detailed in Comment 2.b.iv, update the activity units or emission factors used for the amount of ore processed per activity period.*

The units have been updated to more accurately reflect the amount of ore being processed per activity period. 800 tons per day is the maximum potential amount of ore processed at the site.

ii. *Update the emission estimates in Tab 3 to account for six independent drop points. The emission estimates only account for one drop points. Either the activity usage or the emission factor should be multiplied by a factor of 6 to account for the separate emission points.*

The activity usage for the Drop Points has been multiplied by a factor of 6 in the AQ520 form to more accurately represent six independent drop points.

iii. *Update the emission estimates in Tab 3 to use worst case daily emissions estimates calculated using the lowest moisture content and highest wind speeds, per AP-42 chapter 13.2.4.*

Tab 3 of the AQ520 form was updated to reflect the worst-case daily emissions calculated using the lowest moisture content of 4% and highest daily wind speeds of 28.97 per AP-42 chapter 13.2.4.

j. *Stockpiles (TEU AS and TEU IS): Update the emissions estimates in Tab 3 to account for two points of emission (material handling and wind erosion) and different average annual and maximum daily emission factors; using the calculation requirements detailed in Comment 2.c.ii.*

Tab 3 of the AQ520 form was updated to reflect two separate points of emissions for the Stockpiles: material handling and wind erosion. These updates were made using the calculation requirements detailed in Comment 2.c.ii of this letter.

k. *Welding emissions (TEU WELD1, TEU WELD2, TEU WELD3 and TEU WELD4):*

i. *Update Tab 2 to say "212" instead of "211"*

The naming convention was incorrectly entered in the Welding SDS Review tab – the documented material name per the SDS is *Innershield NR-211-MP*. As such the label in Tab 2 is correct and remains unchanged.

ii. *Correct emissions as detailed in Comment 2.d.i - 2.d.iv.*

All welding emissions have been updated in accordance with Comments 2.d.i – 2.d.iv both in the emission calculation workbook and the AQ520 form.

l. Material Balance emissions:

i. Include emissions from usage of the following materials or provide justification that they are exempt:

1. PB Penetrating Catalyst; and,

2. Cyclo Breakaway Fast Penetrating Oil.

Each of these materials do not have any associated TACs and therefore are exempt from reporting per OAR 340-245-0060(3)(a). The emission units have been added to Tab 5 of the AQ520 with clarification on their exemption status.

ii. TEU MA4: On Tab 5, for Rustoleum Spray Paint, include Cobalt 2Ethylhexanoate as Cobalt and compounds (CASRN 7440-48-4).

Cobalt 2-Ethylhexanoate was added to the emission calculations and AQ520 form for TEU-MA4 as Cobalt and compounds (CASRN 7440-48-4).

5. *Based on the activity usage and submitted SDSs, DEQ concurs that WELD2, WELD3, MA2, and MA3 material usages are exempt in accordance with OAR 340-245-0060(3)(a). Please update the reference information provided in Tabs 2 and 4 to cite OAR 340-245-0060(3)(a) for the exemption (currently OAR 340-245-0060(3)(b) is cited).*
   The citation for CAO TEU exemption status was updated to reference OAR 340-245-0060(3)(a) for all exempt emission units listed in the AQ520 form.

If you have any questions or comments about the information presented, please do not hesitate to contact Greg Nostrand with Trinity Consultants at Greg.Nostrand@trinityconsultants.com or myself at david.dooley@imerys.com.

Sincerely,

David Dooley
Imerys Perlite USA

Cc: Greg Nostrand, Trinity Consultants
Jesse Gonzalez, Trinity Consultants
Karon Brown, Imerys Perlite

Attachment A Baghouse Operation and Maintenance Plans
Attachment B Source Test Data
Attachment C Meteorology Data
Attachment D Meteorology Representativeness Discussion
Attachment E Site SDS's and similar SDS's for Density
Attachment F Process Flow Diagram

Attachment G Fugitive Dust Control Plan