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November 6, 2025

Amy DeVita-McBride – CAO Project Engineer
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Submitted via YDO

Re: Extension Request for Submittal of the Cleaner Air Oregon Emission Inventory and Supporting Documents

Dear Ms. DeVita-McBride:

ATI Specialty Alloys & Components (ATI) received written notice from the Oregon Department of Environmental Quality (DEQ) on September 5, 2025 that our Millersburg, Oregon facility was being called into the Cleaner Air Oregon (CAO) program.

Unless an extension is granted by DEQ, our site-wide CAO emissions inventory and supporting documents would be due for submittal within 90 days of the DEQ call-in notice date, or by December 4, 2025.

As discussed during our October 1, 2025 meeting, ATI is interested in requesting an extension of the December 4th deadline to enable ATI and DEQ to take a phased approach to the EI's development and future EI submittals.

ATI has made significant progress in preparing the EI and supporting information. Specifically, we are in the process of drafting emission calculations for natural gas combustion sources and emergency generators, and preparing a detailed process flow diagram. We have conducted a kick-off meeting with DEQ and we hosted the DEQ team for a site visit on November 5, 2025. We are also working to identify Categorically Exempt TEUs for our facility.

However, given the size and complexity of the site and ATI's desire to anticipate and develop the EI to accommodate potential future business changes, additional time is necessary to complete a site-wide EI. Accordingly, ATI proposes to submit the following items by December 4:

- Emissions inventory for natural gas combustion and emergency generators (calculations, supporting information and AQ520 Form);
- Overall site-wide process flow diagram; and
- AQ523 Form for Categorically Exempt TEUs.

Subsequently, ATI will propose a meeting with DEQ to discuss timeline for the next phase of the EI to be developed (i.e., to identify the next set of TEUs). ATI would like to have that meeting with DEQ after its December 4 submittal, but no later than January 12, 2026.



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ATI is committed to developing a thorough, representative CAO EI and respectfully requests that DEQ grant additional time for this effort, as proposed. We look forward to continued collaboration with DEQ throughout the CAO process. Please contact Mike Riley at Michael.riley@atimaterials.com with any questions regarding this extension request.

Sincerely,

Tony Valladares, Sr. Director - EHS ATI
Specialty Alloys & Components 1600
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