

Department of Environmental Quality
Agency Headquarters

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November 21, 2025

ATI Specialty Alloys & Components, LLC dba ATI Millersburg Operations P.O. Box 460 Albany, OR 97321 Sent electronically only

Tony Valladares,

On September 5, 2025, ATI Specialty Alloys & Components, LLC (ATI) received notice that the ATI Millersburg facility (DEQ Air Quality Source Number 22-0547) was called in to the Cleaner Air Oregon (CAO) program. On November 18, 2025, DEQ received a request from ATI for a partial extension of the deadline for submittal of the CAO Emissions Inventory (Inventory).

ATI proposes to submit a partial Inventory by the original due date of December 4, 2025, which will include the natural gas combustion and emergency generator Toxics Emissions Units (TEUs), site-wide process flow diagram(s), and Form AQ523 for Categorically Exempt TEUs. Due to the size and complexity of the facility, ATI is requesting additional time to develop and submit emissions and supporting documentation for the remaining TEUs in stages.

DEQ may grant an extension based on the criteria set in OAR 340-245-0030(3), which require sources to demonstrate progress towards completing the submittal and show that a delay is necessary for good cause. ATI has demonstrated progress on the Inventory by proposing to provide emissions data for some TEUs and key process information by the original deadline, proactively requesting meetings with DEQ, and working with a consultant to develop the detailed emissions data required by CAO. ATI has met with DEQ to discuss the proposal for submitting emissions information in stages and also hosted DEQ for a tour of the Millersburg facility.

DEQ is committed to completing ATI's CAO Risk Assessment expeditiously and accurately. Given the complexity of ATI's operations, this will be best achieved by DEQ and ATI working collaboratively to ensure the Inventory meets CAO requirements. The information proposed to be submitted by the original deadline will provide a framework for beginning this process.

For these reasons, DEQ approves ATI's extension request. The following information must be submitted by the original deadline of **December 4, 2025**:

- An Inventory of natural gas combustion and emergency engine TEUs including the AQ520 form and all supplemental documentation required under OAR-340-245-0040(4);
- Detailed process flow diagram(s) for all emissions producing activities at the facility, including expected points of all fugitive and non-fugitive emissions and air pollution control devices; and
- Categorically Exempt TEUs Form AQ523.

ATI must also schedule a meeting with DEQ to establish a submittal plan for the remaining Inventory information, to take place **no later than January 30, 2026**.

DEQ remains available to meet with ATI or provide feedback via email. Please contact me directly at 971-300-3653 or amy.devita-mcbride@deq.oregon.gov, if you have any questions regarding this letter or CAO submittal requirements. I look forward to your continued assistance with this process.

Sincerely,

Amy DeVita-McBride

Cleaner Air Oregon Project Engineer

Amy DeVita-McBride

Cc: Mike Riley, ATI Specialty Alloys & Components, LLC

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