

December 31, 2025

Julia DeGagné, P.E.
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

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

Dear Ms. DeGagné:

Intel Corporation (Intel) received written notice from the Oregon Department of Environmental Quality (DEQ) on May 29, 2025 that the Gordon Moore Park at Ronler Acres Campus (Ronler) and the Aloha Campus (Aloha) were being called into the Cleaner Air Oregon (CAO) program. Ronler and Aloha both operate under Standard Air Contaminant Discharge Permit (ACDP) 34-2681-ST-02, issued by DEQ on April 16, 2024.

On November 14, 2025, DEQ submitted a letter via YDO requiring the submittal of the emissions inventory for the following by January 16, 2026:

1. An Emissions Inventory including an AQ520 form and all supplemental documentation required under OAR-340-245-0040(4) for all storage tanks on site that emit Toxic Air Contaminants (TACs) or store materials containing TACs;
2. A Categorically Exempt Toxics Emissions Units (AQ523) form listing TEUs that are exempt under OAR 340-245-0060(3)(b); and
3. A list of any TEUs that Intel is requesting exemption for under OAR 340-245-0060(3)(a), recorded on Worksheet 2 of the AQ520 form and accompanied by sufficient documentation to demonstrate that the TEU is not likely to materially contribute risk.

In accordance with OAR 340-245-0030(3)(a) Intel has made good progress in completing this submittal. This extension is necessary to provide accurate emissions estimates.

OAR 340-245-0030 -

(3) An owner or operator may request an extension of time from a deadline established in section (1) or section (2) by providing DEQ with a written request no fewer than 15 days prior to the submittal deadline. DEQ may grant an extension based on the following criteria:

- (a) The owner or operator has demonstrated progress in completing the submittal; and
- (b) A delay is necessary, for good cause shown by the owner or operator, related to obtaining more accurate or new data, performing additional analyses, or addressing changes in operations or other key parameters, any of which are likely to have a substantive impact on the outcomes of the submittal.

Intel has made substantial progress on this submittal, however, given the number and complexity of process and waste tanks, additional time is needed. Intel has compiled extensive data related to its

tanks and associate chemical data. Intel worked with the modelling software company to update the program to include the CAO chemicals and their chemical properties. Intel developed calculations to account for pollutant specific abatement parameters, where applicable. In addition, Intel worked with the waste vendor to obtain analytical data of the waste tanks to include CAO chemicals. This additional time is necessary as significant time is required to: (1) verify waste profiles, chemical data, tank parameters, and locations for the large inventory of tanks, (2) validate the new tank emissions modeling software in coordination with the software developer due to recent model updates and switching from a desktop based program to a cloud based program. Intel is requesting an extension until February 17, 2026 for the submittals above.

Intel is dedicated to providing an accurate and representative CAO emissions inventory and respectfully requests that DEQ grant additional time for this effort. We look forward to continued collaboration with DEQ throughout the CAO process. Please contact Ruth Glass at ruth.glass@intel.com or Leslie Riley at lriley@maulfoster.com with any questions regarding this extension request.

Sincerely,

Ruth Glass

Ruth Glass

TD Environmental Engineer
Intel Corporation

CC: J.R. Giska, DEQ
Intel Site Air Correspondence File