



Oregon

Tina Kotek, Governor

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January 30, 2026

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

Tony Valladares,

DEQ called in the ATI Specialty Alloys & Components, LLC (ATI) facility in Millersburg, OR to the Cleaner Air Oregon (CAO) program on September 5, 2025. 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). DEQ received the submittal of the first part of ATI's Inventory (Inventory Part 1) including: process flow diagrams; Categorical Exempt Toxics Emissions Units (TEUs) Form AQ523; and emissions information (AQ520 form) for the natural gas combustion and emergency engine TEUs on December 4, 2025 (Your DEQ Online Submittal ID 72766). DEQ has completed an initial review, and in accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), has determined that the following additional information, corrections, and updates to the Inventory Part 1 are required to be submitted by **21 days** after the issuance date of this letter, or **February 20, 2026**:

General Comments

Maximum Daily Emergency Engine Use: ATI has assumed one (1) hour of daily non-emergency use for each emergency engine for the PTE basis. DEQ recommends ensuring that the PTE basis be reflective of the worst-case maximum daily use for these engines as these daily fuel usages may be included as permit limits.

Specific Comments

1. **Fuel Combustion (TEU EU_09):**
 - a. **Ammonia Recovery Boiler 1 (TESU S51):** The Review Report for ATI's Title V permit indicates that Ammonia Recover Boiler 1 is equipped with distillate (ASTM Grades 1 & 2) and residual (ASTM Grade 6) oil backup burners. Emissions estimates for combustion of these fuel oils were not evaluated in the Inventory Part 1. If ATI would like to maintain the operational flexibility to use fuel oils at this boiler, revise the Inventory Part 1 to include emissions for fuel oil combustion as a new TESU.
 - b. **Ammonia Recovery Boiler 2 (TESU S52):** The Review Report for ATI's Title V permit indicates that Ammonia Recover Boiler 2 is equipped with distillate (ASTM Grades 1 & 2) oil backup burners. Emissions estimates for combustion of these fuel oils were not evaluated in the Inventory Part 1. If ATI would like to maintain the operational flexibility to use fuel oils at this boiler, revise the Inventory Part 1 to include emissions for fuel oil combustion as a new TESU.
 - c. **Cogen Natural Gas Engines:** ATI's Title V permit lists the facility has five (5) natural gas cogeneration engines. These engines were excluded from the Inventory Part 1 as part of

TEU EU_09. If ATI plans to use these engines in the future, revise the Inventory Part 1 to include emissions for natural gas combustion at these TESUs.

2. **Revised Inventory:** Submit to DEQ a revised AQ520 Inventory Form, along with all supporting calculations in Excel format, as well as all information required under [OAR 340-245-0040\(4\)](#). Include the following updates to the Inventory Part 1:
 - a. Fuel Combustion (TEU EU_09):
 - i. Ammonia Recovery Boiler 1 (TESU S51):
 1. Update the Inventory Part 1 as appropriate to account for alternate fuel use at Ammonia Recovery Boiler 1 per Specific Comment 1.a.
 2. Actual annual activity for this TESU indicates no natural gas usage for 2024 at this boiler, however an actual maximum daily usage of 1.14 million standard cubic feet (MMscf) natural gas is listed. Review and revise as appropriate.
 - ii. Ammonia Recovery Boiler 2 (TESU S52): Update the Inventory Part 1 as appropriate to account for alternate fuel use at Ammonia Recovery Boiler 2 per Specific Comment 1.b.
 - iii. R&D Boiler (TESU S54): Include emissions estimates for benzo[a]pyrene (CASRN 50-32-8) using an emission factor of 0.0000012 lb/MMscf.¹
 - iv. Hf Oxide Kiln (TESU S12):
 1. Information presented in the ATI's Title V permit indicates the Hf Oxide Kiln has associated pollution control device(s). Update Worksheet 2 to include any control devices for this TESU.
 2. Include emissions estimates for benzo[a]pyrene (CASRN 50-32-8) using an emission factor of 0.0000012 lb/MMscf.¹
 - v. Zirconium Kiln (TESU S20): Information presented in the ATI's Title V permit indicates the Zirconium Kiln has associated pollution control device(s). Update Worksheet 2 to include any control devices for this TESU.
 - vi. Update the Inventory Part 1 as appropriate to include the Cogen Engines as TESUs per Specific Comment 1.c.
 - b. Emergency Generators (TEU EU_EG):
 - i. TESU EG-09: Actual annual activity for this TESU indicates no fuel usage for 2024 at this engine, however an actual maximum daily usage of 107 gallons of diesel is listed. Review and revise as appropriate.
 - ii. TESU EG-11: Emission factors for this TESU differ from the CAO's approved list of emission factors for diesel reciprocating internal combustion engines. Review and revise as appropriate.
 - iii. TESU EG-13: Emission factors for this TESU differ from the CAO's approved list of emission factors for diesel reciprocating internal combustion engines. Review and revise as appropriate.

DEQ requests that you submit additional information to complete your Inventory. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in [OAR 340-214-0130](#) to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from

¹ EPA. September 1998. AP-42 Chapter 1, Table 1.4-3 "Emission Factors for Speciated Organic Compounds from Natural Gas Combustion." https://www.epa.gov/sites/production/files/2020-09/documents/1.4_natural_gas_combustion.pdf

disclosure.

DEQ remains available to discuss this information request and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines in this letter may result in a violation of [OAR 340-245-0030\(2\)](#).

If you have any questions regarding this letter please contact me directly at (971) 300-3653 or amy.devita-mcbride@deq.oregon.gov. I look forward to your continued assistance with this process.

Sincerely,



Amy DeVita-McBride
Cleaner Air Oregon Project Engineer

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