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February 20, 2026

Sent Via Your DEQ Online:

Amy DeVita-McBride
Cleaner Air Oregon Project Engineer
Oregon Department of Environmental Quality

**RE: TDY Industries LLC, d.b.a. ATI Millersburg (ATI MB)
Cleaner Air Oregon Submittal #2**

Amy DeVita-McBride,

The purpose of this letter is to respond to your January 20, 2026 letter providing comments on our first Cleaner Air Oregon Air Toxics Emissions Inventory (ATEI) Submittal #1 and to briefly describe the contents of our ATEI Submittal #2.

The comments provided in your January 20th letter are shown below in italicized text followed by our response.

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.

Response:

The assumed one hour of daily non-emergency use of the emergency engines is adequate for the emissions inventory and potential use limitations at this time. ATI may need to modify this assumption based on operational needs and the outcomes of the site wide CAO risk assessment.

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.

Response:

ATI has no plans to operate these two boilers using fuel oil and associated emissions need not be included in the ATEI. ATI understands the use of such fuel oils could be restricted under a future CAO air permit.

- 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

Response:

ATI has no plans to install and operate these Cogen Natural Gas Engines and associated emissions need not be included in the ATEI.

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.*

Response:

No update required. See response above.

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.*

Response:

The AQ520 Form has been revised. 2024 natural gas usage in Ammonia Recovery Boiler 1 was 0.

- 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.*

Response:

No update required. See response above.

- 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*

Response:

The AQ520 Form has been updated to include this emission factor.

- 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*

Response:

Worksheet 2 has been updated to identify the control device but no removal of the pollutants emitted from natural gas combustion is claimed in Worksheet 3. The AQ520 Form has been updated to include the emission factor for benzo[a]pyrene.

- 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.*

Response:

Worksheet 2 has been updated to identify the control device but no removal of the pollutants emitted from natural gas combustion is claimed in Worksheet 3.

- vi. *Update the Inventory Part 1 as appropriate to include the Cogen Engines as TESUs per Specific Comment 1.c.*

Response:

No update required. See response above.

- 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.*

Response:

The AQ520 Form has been updated.

- 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.*

Response:

The AQ 520 Form has been updated for EG-11 and EG-13.

As discussed during our January 29, 2026 meeting today's YDO submission also includes ATI's air toxics emissions inventory Submittal #2 inclusive of emissions estimates from acid cleaning and abrasive blasting operations and an assessment of cooling tower water treatment chemicals to conclude the cooling towers are exempt TEUs. Submittal #2 appends Submittal #1. Accordingly, we are submitting a single AQ520 Form along with supporting information.

If you have any questions, please contact Mike Riley at michael.riley@atimaterials.com.

Sincerely,

Submitted electronically via YDO

Tony Valladares
Senior Direction of EHS