Oregon
Tina Kotek, Governor

Department of Environmental Quality
Agency Headquarters
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

March 13, 2026

ATI Specialty Alloys & Components, LLC
dba ATI Millersburg Operations
P.O. Box 460
Albany, OR 97321
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). Given the complexity of ATI's operations, DEQ plans to review partial Inventory submittals and provide comments on these partial submittals to ATI on an ongoing basis. DEQ received the submittal of the first part of ATI's Inventory (Inventory Part 1) on December 4, 2025 (Your DEQ Online Submittal ID 72766). In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ issued a written request on January 30, 2026, requiring additional information and a revised Inventory Part 1 to be submitted by February 20, 2026. To date, DEQ has received the following partial Inventory submittals:

- Inventory Part 1: Process flow diagrams; Categorically Exempt Toxics Emissions Units (TEUs) Form AQ523; and emissions information (AQ520 form) for the natural gas combustion and emergency engine TEUs. Inventory Part 1 was initially submitted on December 4, 2025, and revised February 19, 2026.
- Inventory Part 2: Emissions information (AQ520 form) for all cooling towers, pickling tanks, and abrasive blasting TEUs submitted on February 19, 2026. Emissions for these TEUs were combined in a single AQ520 with the TEUs from Inventory Part 1.

DEQ has reviewed these partial Inventory submittals and identified additional updates that are needed before approval. In accordance with OAR 340-245-0030(4)(b), DEQ is providing ATI with a revised deadline for submittal of a revised Inventory. Please submit the information specified below by **35 days** after the issuance date of this letter, or **April 17, 2026**.

General Comments

Toxic Emission Units (TEUs) in the Inventory should match the Emission Units (EUs) in ATI's Title V Operating Permit (permit) where appropriate. To reduce confusion and aid in the CAO review process, ensure consistency in EU naming between the permit, Inventory, and other supporting materials, especially with respect to the use of spaces, underscores, and hyphens/dashes.

Specific Comments

1. **Process Flow Diagram**: Update the process flow diagram to include the following missing TESUs:
    a. Hf Oxide Kiln (TEU EU_09, TESU S12);
    b. Extrusion Press Cell BH1 (TEU EU-AI, TESU S71-1);

c. Extrusion Press Cell BH2 (TEU EU-AI, TESU S71-2);
d. Metals acid cleaning (Fab & Extrusion) Stack Emissions (TEU EU12, TESU S42); and
e. Metals acid cleaning (Extrusion) Stack Emissions (TEU EU12, TESU S106).

2. **Cooling Towers**: Review of SDSs for cooling tower water treatment identified several materials which contain TACs. ATI has indicated they believe the cooling towers to be Exempt TEUs under OAR 345-245-0060(3)(a) given both the manner of use and low usage rates of these materials.
    a. DEQ requires additional information to approve the Exempt TEU analysis. Provide the information below for each cooling tower:
        i. Target pH of cooling tower recirculation water; and
        ii. Target dosing concentrations and annual usage rates for the following cooling tower water treatment chemicals:
            1. ChemTreat CL497;
            2. ChemTreat CL1459;
            3. ChemTreat CL2840; and
            4. ChemTreat CL6832.
    b. Exempt TEUs must be listed in Worksheet 4 of the AQ520 form, but there is no requirement to include usage and/or waste rates for the materials and they can be excluded from Worksheet 5 as you do not need to estimate emissions for Exempt TEUs. Include the following TAC containing materials under a Cooling Tower TEU on Worksheet 4 of the revised AQ520 form requested under Specific Comment 3, but note as exempt:
        i. ChemTreat CL497;
        ii. ChemTreat CL1459;
        iii. ChemTreat CL2840; and
        iv. ChemTreat CL6832.

3. **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:
    a. Update submittal information in Worksheet 1 of the AQ520 for each new/revised submittal. The following information should be reviewed and updated for each submittal:
        i. Date of Form Submittal; and
        ii. Facility Notes.
    b. Ammonia Recovery Boiler 1 (TEU EU_09, TESU S51): Worksheet 2 has a PTE annual natural gas usage estimate for this TESU, but the PTE maximum daily natural gas estimate is zero. Review and revise as appropriate.
    c. Abrasive Blasting TESUs:
        i. Provide a copy of the source test report referenced for the particulate matter emission rate.
        ii. Provide additional information on the types of materials processed through each abrasive blasting TESU. For example, indicate the types of alloys processed and whether any of the materials are coated. Additionally indicate whether the abrasive blasting TESUs are processing production or maintenance materials.
        iii. Include the type of control device (such as baghouse) along with the control device identifier in Column D of Worksheet 2 for the following TESUs:
            1. Blaster BL 04 (TEU EU-04, TESU S41);
            2. Blaster BL 03 (TEU EU-04, TESU S43);

3. KK Blaster (TEU EU-04, TESU S28);
4. Recycle Tumble Blaster (TEU EU-04, TESU S26);
5. LP blaster (TEU EU-04, TESU S32);
6. EBMS South Blaster (East Baghouse) (TEU EU-05, TESU S37);
7. Extrusion Press Cell BH1 (TEU EU-AI, TESU S71-1); and
8. Extrusion Press Cell BH2 (TEU EU-AI, TESU S71-2).

iv. Supporting information provided by ATI indicates that the following abrasive blasting TESUs use a garnet abrasive. Update the references in Column L of Worksheet 3 as appropriate.
1. Blaster BL 04 (TEU EU-04, TESU S41);
2. Blaster BL 03 (TEU EU-04, TESU S43); and
3. LP blaster (TEU EU-04, TESU S32).

v. Supporting information provided by ATI indicates that the following abrasive blasting TESUs use a steel shot abrasive. Update the references in Column L of Worksheet 3 as appropriate.
1. KK Blaster (TEU EU-04, TESU S28);
2. Recycle Tumble Blaster (TEU EU-04, TESU S26);
3. EBMS South Blaster (East Baghouse) (TEU EU-05, TESU S37);
4. Extrusion Press Cell BH1 (TEU EU-AI, TESU S71-1); and
5. Extrusion Press Cell BH2 (TEU EU-AI, TESU S71-2).

vi. ATI estimated hexavalent chromium (CASRN 18540-29-9) emissions using an emission factor from South Coast Air Quality Management District's "Guideline for Calculating and Reporting Emissions from Laser or Plasma Cutting of Metal Materials Operations" document. This emission factor is based on the amount of chromium in the base metal removed during plasma cutting but is applied in the Inventory as a fraction of the chromium emitted. DEQ does not feel this is a representative reference for abrasive blasting activities. Instead, estimate emissions of hexavalent chromium from abrasive blasting as 3 percent of total chromium emissions consistent with chromium speciation data available for cleaning and finishing operations at Iron and Steel Foundries.[1]

vii. Confirm the flowrate for the EBMS South Blaster (East Baghouse) (TEU EU-05, TESU S37). Information in the Review Report shows a flow rate of 2,500 actual cubic feet per minute (acfm) for this unit, while calculations in the Inventory use a flow rate of 5,000 acfm. Revise emissions calculations as appropriate.

d. Metals Acid Cleaning TESUs:

i. Supporting calculations indicate that metals acid cleaning activities are typically referenced by the location of the operation (such as building number). Include this information in the "TEU/TESU Description" in Column C of Worksheet 2 for the following EU12 TESUs:
1. Metals acid cleaning (Fab & Extrusion) Fugitive Emissions (TESU B42);
2. Metals acid cleaning (Fab & Extrusion) Stack Emissions (TESU S42);
3. Metals acid cleaning (Extrusion) Fugitive Emissions (TESU B106); and
4. Metals acid cleaning (Extrusion) Stack Emissions (TESU S106).

ii. Provide composition information for the following tanks:

[1] EPA. January 31, 2011. "Exhibit D-1. Chromium Speciation Table Used for the 2005 NATA." *An Overview of Methods for EPA's National-Scale Air Toxics Assessment.* https://www.epa.gov/sites/default/files/2015-10/documents/2005-nata-tmd.pdf

1. Fabrication Pickle Tank 3b; and
2. Extrusion Pickle Tanks 1 through 5.

iii. Provide a description of the ventilation systems at the pickling tanks. Include a description of the location of any direct ventilation hoods at these pickling tanks and a justification for the 25 percent as fugitive assumption.

iv. The evaporation rate calculations in the "12_Acid Cleaning_Pickling" worksheet use a wind speed of 1.7 miles per hour. Provide justification for the use of this wind speed. If the tanks are equipped with collection hoods, ATI should consider the design parameters of the ventilation system.

v. Update hydrogen fluoride (CASRN 7664-39-3) emission estimates to use partial pressure data for hydrogen fluoride. ATI did not have a source of partial pressure data for hydrogen fluoride and had assumed hydrochloric acid (CASRN 7647-01-0) partial pressure data as representative. DEQ will provide ATI with a reference to estimate the partial pressure of hydrogen fluoride. If ATI elects to use an alternative reference, include a copy with the Inventory submittal.

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 disclosure.

DEQ remains available to discuss this information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of OAR 340-245-0030(4)(b).

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

Amy DeVita-McBride
Cleaner Air Oregon Project Engineer

Cc: Mike Riley, ATI Specialty Alloys & Components, LLC
Jen Wagner, ATI Specialty Alloys & Components, LLC
John Browning, Bridgewater Group
Greg Nostrand, Trinity Consultants
Thomas Rhodes, DEQ
Laura McWhorter, DEQ
J.R. Giska, DEQ
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