



Oregon

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December 16, 2025

Imerys Perlite USA, Inc.
96078 Industrial Lane,
Lakeview, OR 97630
Submitted online only

David Dooley,

DEQ called in the Imerys Perlite USA, Inc. (Imerys) facility in Lakeview, OR to the Cleaner Air Oregon (CAO) program on January 2, 2025, and received the submittal of the Emissions Inventory on June 2, 2025. The Emissions Inventory consisted of the AQ520 form (Inventory), Attachment 1 Imerys CAO inventory calculations v1.0 (supporting calculations), AQ523 form, and supporting documentation. In accordance with Oregon Administrative Rule [\(OAR\) 340-245-0030\(2\)](#), DEQ issued a written request on August 11, 2025, requiring additional information and a revised Emissions Inventory to be submitted by October 10, 2025. Imerys submitted a revised Emissions Inventory on October 10, 2025.

DEQ has reviewed the revised Emissions Inventory and identified additional updates that are needed before approval. In accordance with [OAR 340-245-0030\(4\)\(b\)](#), DEQ is providing Imerys with a revised deadline for submittal of a revised Emissions Inventory. Please submit the information specified below by February 16, 2026.

1. Provide the following **additional information**:

- a. Submit to DEQ additional information and updates to the Tank ESP model used to estimate emissions from the following Toxics Emissions Units (TEUs) per [OAR 340-245-0040\(4\)\(b\)\(C\)](#):
 - i. Tanks (TEUs TANK1 and TANK2): Provide “Show Calculation Steps” spreadsheet outputs from the Tank ESP model for the following scenarios:
 1. Short term emissions, estimated using the Texas Commission on Environmental Quality (TCEQ) method (an option in Tank ESP); and
 2. Annual emissions.
 - b. Provide additional information on the fugitive dust management conducted at the facility for the stockpiles. Include wet suppression technique(s) used, frequency and amount of wetting of the stockpiles, as well as type of wetting material used.
 - c. Provide information on the variation in the size, including total footprint, surface area, and height, of the active and inactive stockpiles onsite.
2. DEQ has determined that Klamath Falls is not representative of the Lakeview area due to the significant terrain and distance between the two communities. DEQ understands the Lake County Regional Airport does not have ASOS data and therefore would have increased calm winds compared to an ASOS station. Regardless, DEQ feels that this site is more representative of

meteorological conditions in Lakeview and recommends its use in this assessment. Please review any data substitution options to reduce the number of calm winds in the final dataset.

Please revise and submit supporting calculations using the most recent Lake County Regional Airport meteorological data for the following:

- a. Drop points emissions estimate calculations in the **Imerys CAO inventory calculations** workbook.
 - b. Stockpiles emissions estimate calculations in the **Imerys CAO inventory calculations** workbook.
 - c. Risk Assessment modeling, if a Level 3 or Level 4 Risk Assessment is conducted.
3. Provide a revised **CAO Emissions Inventory AQ520 form** that includes the updates and revisions required below:
- a. In Tab 2, Column F, update the units for the Active Stockpile – Material Handling Emissions and the Inactive Stockpile – Material Handling Emissions (TEUs ASMH and ISMH) to tons ore.
 - b. Any updates required to reflect updated emissions estimates as a result of satisfying Comments 1 and 2, above.
4. Provide revised **Imerys CAO inventory calculations** that include the updates and revisions required below:
- a. Any updates required to satisfy Comments 1 and 2, above.
 - b. On the “stockpiles” tab, the surface area of the stockpiles should be used for calculating daily and annual emissions instead of the footprint area. Please include assumptions and supporting justification for the methods used to calculate surface area.

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 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 heather.kuoppamaki@deq.oregon.gov or 503-407-7596, and I look forward to your continued assistance with this process.

Sincerely,



Heather Kuoppamaki, P.E.
Cleaner Air Oregon Project Engineer

Cc:

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