



Oregon

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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 submittal consisted of the AQ520 form (Inventory), Attachment 1 "Imerys CAO inventory calculations v1.0" (supporting calculations), an AQ523 Exempt Toxics Emissions Unit (TEU) form, and other supporting materials. In accordance with Oregon Administrative Rule [\(OAR\) 340-245-0030\(2\)](#), DEQ issued written requests on August 11, 2025 and December 16, 2025, requiring additional information and revised Inventories. Imerys submitted revised Inventories on October 10, 2025, and February 16, 2026.

DEQ has reviewed the revised 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 Inventory and supporting materials. Please submit the information specified below by **April 9, 2026**.

1. Provide a revised **CAO Emissions Inventory AQ520 form** that includes the updates and revisions required below:
 - a. Update the emission factors and emissions estimates for TEU-ROAD. In Tab 3, the daily (Column G) and annual (Column F) emission factors are swapped. The emissions estimates provided in Tab 3 use the incorrect emission factor (daily instead of annual and vice versa).
 - b. The emission factors and calculated emissions for Barium and compounds (CASRN 7440-39-3) changed from the previous version of the AQ520 form. Provide a justification for the new emission factors and updated calculated emissions, or change these values to those presented in the previous version of the AQ520 form for the following TEUs:
 - i. RDB;
 - ii. Main;
 - iii. Main_U;
 - iv. New;
 - v. New-U; and,
 - vi. SCALP
 - c. Update the emission factors and emissions estimates to account for changes made in response to Comment 2, below.
2. Provide revised **Imerys CAO inventory calculations** that include the updates and revisions required below:
 - a. The Tanks calculations (**Tabs ESP Input, ESP Output, Tank Sample Calc -1, Tank Sample Calc -2, and Tank Sample Calc - 3**) appear to use meteorological data from Salem,

OR. Please use Medford, OR meteorological data from AP-42 Chapter 7 Table 7.1-7 or historical meteorological data from a nearby location. If using other historical meteorological data, provide the primary reference documents used.

b. **Storage Tanks tab:**

- i. Update the short-term emissions estimates to use 554.67 Rankine for the worst-case liquid surface temperature, as stated in the TCEQ guidance¹.
 - ii. Update the daily activity data so that the value in the Storage Tanks tab (12,161 gal/day) used to calculate estimated emissions matches the value in Tab 2 of the AQ520 form (560 gal/day).
- c. In the **Unpaved Roads tab**, update the units in cells B31, C31, and D31 to have units of lb/VMT.
- d. Update the control efficiency listed in the **Stockpiles tab** for fugitive dust control from 90% to 85% for use in the emission estimate calculations. The AQ520 form lists 85% control efficiency and this is the approved control efficiency for use with this TEU.

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:

File

¹ <https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/NewSourceReview/emissrates-tanks6250.pdf>