



# Oregon

Tina Kotek, Governor

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PCC Structurals, Inc.  
4600 SE Harney Drive  
Portland, OR 97206  
*Sent electronically only*

Brandon Hadzinsky,

I have reviewed the BH8901 source test report submitted by PCC Structurals on October 17, 2025. Based on my review of the source test report, DEQ requires that the following issues be addressed in a revised source test report. The revised source test report is due by February 26, 2026.

### ***Method Specific Comments***

#### ***Oregon Method 5***

1. Revise the hexane and acetone blank corrections for all test runs using the actual blank and rinse volumes.

#### ***EPA Method 29***

1. Provide additional details on the blank correction for nickel for runs 1 and 2 at the outlet.
2. Revise the mass of mercury for run 2 at the inlet to match the sum of the fractions in the lab report on pages 159 and 160.
3. Revise the moisture on inlet runs 1 and 2 to include the mass of water that was recorded on the data sheets for the second silica gel impinger.

#### ***SW 846 Method 0061***

1. Revise the moisture used in the calculations on outlet runs 1 and 2. Use the moisture from the corresponding outlet Method 29 runs.
2. Revise the moisture used in the calculations on inlet runs 1 and 2 using the revised moisture from the corresponding inlet Method 29 runs.
3. Revise the blank corrections using only the volume of KOH charged in each sample train and the rinse used for all test runs

DEQ recognizes the unique challenges this testing posed to your facility and operations, and the results will provide valuable information for completing the risk assessment. If you have any questions or concerns, please contact me directly at 503-869-0054 or [thomas.rhodes@deq.oregon.gov](mailto:thomas.rhodes@deq.oregon.gov). Thank you for your continued efforts with this process.

Sincerely,

Thomas Rhodes  
DEQ CAO Source Test Coordinator