



# Oregon

Tina Kotek, Governor

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March 23, 2026

PCC Structural, Inc.  
5001 SE Johnson Creek Blvd  
Milwaukee, OR 97222  
*Sent electronically only*

Brandon Hadzinsky,

In a letter dated July 3, 2025, DEQ approved an extension request for PCC's revised Inventory and supplemental calculations to be submitted by **30 days after source test approval**. DEQ approved PCC's source test on March 23, 2026 (Your DEQ Online [YDO] submittal 74366). The source test approval memorandum is attached to this letter for your convenience.

PCC must submit the revised CAO Emissions Inventory Form ([AQ520](#)) and supporting materials by **April 22, 2026** as identified in [OAR 340-245-0030\(4\)](#). All submittals for the CAO Risk Assessment process must be completed through [Your DEQ Online \(YDO\)](#).

If you have any questions regarding this letter, please contact me directly (503-407-7596, [heather.kuoppamaki@deq.oregon.gov](mailto:heather.kuoppamaki@deq.oregon.gov)), and I look forward to your continued assistance with this process.

Sincerely,

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

Attachments:

DEQ Source Test Review Report dated March 23, 2026.

Cc:

David Graiver, DEQ  
J.R. Giska, DEQ  
File

State of Oregon  
Department of Environmental Quality

Memorandum

Date: 3/23/2026

**To:** File / Heather Kuoppamaki  
**From:** Thomas Rhodes

**Subject:** Source Test Review Report  
PCC Structurals, Inc.  
Permit Number: 26-1867-ST-01

Test Dates: July 29 – August 1, 2025  
Report Received: October 17, 2025  
Revised Report Received: February 26, 2026  
Source Testers: Mostardi Platt  
DEQ Observed: Yes

**Source Description:** Steel and titanium investing casting foundry.

**Processes / Emissions Units Tested:** Baghouse/HEPA 8901 which controls emissions from the ingot finishing operations in the Alloy Service Center, which includes cutting and grinding activities.

**Test Purpose:** To demonstrate removal efficiencies for particulate matter and several metal toxic air contaminants (TACs) across the baghouse system.

**Testing Locations:**

**Baghouse 8901 Outlet:**

Diameter:	12"
Distance A (Method 1):	36" (3.0 Diameters)
Distance B (Method 1):	34" (3.0 Diameter)
Number traverse points utilized:	24

**Baghouse 8901 Inlet:**

Diameter:	12"
Distance A (Method 1):	102" (8.5 Diameter)
Distance B (Method 1):	240" (20.0 Diameters)
Number traverse points utilized:	12

**Testing Methodology:** The following testing methods were utilized during the testing program:

Flow Rate & Moisture Content: EPA Methods 1, 2 & 4  
Filterable & Total Particulate: ODEQ Method 5  
Metals: EPA Method 29  
Hexavalent Chromium: EPA SW-846 Test Method 0061

**Summary of Results:** The testing parameters, test results and operating parameters are summarized in a separate spreadsheet.

**Comments:**

- 1) A full review was conducted on the test report. Emission calculations from all runs were checked for accuracy using raw values provided in the test report. The resulting DEQ emissions closely matched those stated in the test report.
- 2) The actual In-Stack Detection Limits (ISDLs) for antimony, arsenic, selenium, silver, and thallium were greater than the estimated ISDLs in the approved source test plan.
- 3) Outlet flowrates were again noticeably lower than the inlet flowrates for the Method 29 test runs. The Method 29 outlet flow rates were 5%-12% lower than the inlet flowrates. Lower measured flowrates at the outlet will bias the calculated removal efficiency high.
- 4) Sample fractions below analytical detection limits restrict the list of metals that should be used for evaluating control efficiency to aluminum, barium, chromium, cobalt, copper, lead, manganese, nickel, phosphorus, zinc and hexavalent chromium. Further analysis can be done if needed to estimate control efficiencies for beryllium, cadmium, mercury, and vanadium which had non-detects in one of the sample fractions.

**Overall Evaluation:** The source test data shows that the baghouse/HEPA achieved removal efficiencies ranging from 0% to 99.9 % depending on the metal TAC. The average total particulate matter removal for the two test runs was 88.7%.