04/17/2026

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RE: Response to ODEQ Comments on ATI CAO emission inventory 1 and 2

Dear Amy Devita-McBride:

This letter summarizes our responses to your March 13, 2026 letter providing comments on the first and second partial inventory submission for Cleaner Air Oregon (CAO). The comments provided in your March 13th letter are provided below in italics followed by ATI's response.

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.

Response:

All TEUs are assigned the same designation as the emission units in ATI's permit. Toxic Emission Sub Units (TESU) are used to identify specific emission points.

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

Response:

a. The HF Oxide Kiln has been added to the Chemical Operations PFD, as S12. These emissions are from the same WESP scrubber.
b. The extrusion press cell BH1, S71-1, has been added to the fabrications PFD in EU AI.
c. The extrusion press cell BH2, S71-2 has been added to the fabrications PFD in EU AI.
d. The stack emissions from the metal acids cleaning in building 42 have been added to the PFD.
e. TESU S106 and TESU B106 have been removed from the PFD as it was found that these sub-emission units are no longer on site. See response to point 3.d below.

Emission units and subunits from Emission Inventory Submittal 3 have been added to the PFD's as well.

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*

Response:
The target PH of the recirculation water is 7.6-9.0

    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.*

Response:
In the emission inventory 2 submittal, five cooling tower SDS's were submitted. Those listed above, and CL2150 for the recirculation levels and the dosing concentrations from four of the cooling tower chemicals. CL2840 is actually used only in some closed cooling water loops, but not in the cooling towers. Provided below are the target dosing concentrations and annual usage rates for the other four chemicals.

Chemical	Dosage (Target Concentration)	Average Annual Usage
CL1459	30-40 ppm	20,664 lb
CL497	12-20 ppm	22,019 lb
CL6832	100-150 ppm	905 lb
CL2150	100-150 ppm	1,221 lb

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.*

Response
Chemicals ChemTreat 1459, ChemTreat 497, ChemTreat 6832 and ChemTreat 2150 have been added to worksheet 4 of the AQ520 designated with a "Cooling Tower" TEU. ChemTreat 2840 is left off as it is not added to the cooling towers.

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.*

Response
The new form has this information included.

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.

Response

This has been updated to a daily value of 1.14 MMCF per day for PTE maximum daily natural gas.

c. *Abrasive Blasting TESUs:*

i. *Provide a copy of the source test report referenced for the particulate matter emission rate.*

Response

ATI has searched through their records and determined that the source test report referenced in the permit documents, ST4 or W08-ST-024 refers to a May 2001 test conducted at the facility. This source test is attached as Draft Full Report May 2001 Horizon Engineering Stack Test.pdf. This stack test does not actually test the abrasive blasting TESU's but instead tests the Hot Saw and other sources at the facility. ATI believes this is the test referred to in the permit and the test data from the Hot Saw Baghouse was used as a representative stack test for the abrasive blasting baghouses onsite, as they process similar materials and are similar baghouses. The rate used is 0.002 grain per dry standard cubic foot (gr/dscf) which is conservatively double the stack test average of 0.001 gr/dscf, and falls within the range of outlet grain values identified in EPA's Air Pollution Control Technology Fact Sheet for pulse jet baghouses, which is 0.001 to 0.005 gr/dscf. Thus the PM emission rate of 0.002 gr/dscf is representative of the baghouse emissions.

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.*

Response

ATI has provided six Safety Data sheets (SDS) of the alloys processed through the abrasive blasting TEU. These blasting TESU's are processing production alloys and not maintenance materials. None of the materials are coated. The SDSs are included in a zipped folder called SDS_alloys.

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).*

Response

Baghouse's and ID's are updated in worksheet 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).*

Response

ATI has updated these to Garnet blasting abrasive. ATI has also added emissions of two additional TACs; Molybdenum Trioxide and Zinc and Compounds, for these sources following further review of the steel shot blasting reference provided in the EI detailed calculations.

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).*

Response
ATI has updated these to steel shot abrasive blasting. ATI has also added emissions from Molybdenum Trioxide and Zinc and compounds for these sources following further review of steel shot blasting from the Kura reference.

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]

Response
ATI accepts DEQ's assessment on the emission factor for hexavalent chromium. ATI will use the 3 percent of total chromium emissions consistent with chromium speciation data available for cleaning and finishing operations at Iron and Steel Foundries.

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.*

Response
ATI agrees and has updated the inventory to use 2,500 acfm as stated in the Review Report for the EBMS South Blaster.

d. *<u>Metals Acid Cleaning TESUs</u>:*
   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).*

Response
The descriptions for TESU's B42 and S42 descriptions have been updated to include building 42. After further evaluation, building 106 no longer contains acid baths. Upon investigation there are acid circulation activities in

building 111. These activities will be evaluated in a future emission inventory submittal. TESU B106 and TESU S106 have been removed from the inventory.

ii. *Provide composition information for the following tanks:*

1. *Fabrication Pickle Tank 3b; and*

Response
Composition information has been provided for the fabrication pickle tank 3b. Upon further review, two more acid tanks were found in the building 42 area, Tank B and Tank C1. Additional identifiers classifying the building 42 tanks have been added to the emissions sheet, identifying the tanks as A1, A2, B, C1, C2, D1, D2 as well as composition information.

2. *Extrusion Pickle Tanks 1 through 5.*

Response
No composition information for the extrusion pickle tanks is provided as those tanks are no longer present.

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.*

Response
Please see attached pdf showing marked up photos of the B42 tanks as well as a video screenshot (figure 2) showing the dry ice smoke being directed at air ducts. This along with the video shown in the 04/09/26 call show a majority of fumes from these tanks flow towards the stack collection system. Thus, 75% stack capture is a conservative assumption of fume capture of these acid bath fumes, as a greater percentage is likely flowing to the stacks exhaust points.

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.*

Response
The calculation methodology used to estimate emissions from the open top tanks was developed for the semiconductor industry and the 1.7 mph wind speed was the default value used in the sample calculation. Field measurements were taken over each set of acid tanks with a calibrated anemometer, which can be seen in Table 2 of the 12_Acid_Cleaning_Pickling tab. The updated calculations use an average of the wind speed over the acid tanks.

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.*

Response
The HF partial pressure has been updated to the values from the DEQ provided reference, Brosheer et al., which are used for calculating the evaporation rates of HF.

If you have any questions, please contact Mike Riley at michael.riley@atimaterials.com.

Sincerely,

Tony Valladares (Submitted electronically via YDO)
Senior Direction of EHS