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RE: Response to Oregon DEQ's Review of Imerys Perlite's CAO Emission Inventory

Trinity submitted a revised Cleaner Air Oregon (CAO) emission inventory on February 16, 2026, for the Imerys Perlite USA, Inc. (Imerys) Lakeview, OR facility. Imerys received a response from the Oregon Department of Environmental Quality (ODEQ) on March 10, 2026, regarding the CAO emission inventory. The CAO emission inventory was revised in response to the comment letter. The comment letter's points are below in italics and the responses in bold. This cover letter serves to address questions and comments from Oregon DEQ in the comment letter and address where changes were made in the emission calculations.

*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).

These emission factors have been updated to reflect the annual and the daily emissions.

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

As discussed with Heather Kuoppamaki on March 17, 2026, these emission factors have not changed. There are two emission factors for Barium and compounds included for all sources that use the perlite concentrations as a basis for speciation. These represent the elemental barium percentage and the total percentage of barium oxide. The above sources did not change from previous iterations of the AQ520 and maintaining the calculations previously submitted would result in a conservative modeled value, since Imerys will utilize the maximum of each pollutant when completing the risk assessment.

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.

As discussed with Heather Kuoppamaki on March 17, 2026, these storage tank calculations use Lakeview, OR as the meteorological location. This is shown on sample Calc-1. The emission calculations and AQ520 will not be updated as this location is close to the facility. The reference documents can be seen in the last submission of the Emission inventory.

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.

As discussed with Heather Kuoppamaki on March 17, 2026, the 554.67 Rankine, worst-case liquid temperature is based on a site in Texas which is unrealistic for Lakeview, Oregon. Instead the maximum temperature from the Tank ESP Output data for Lakeview, Oregon is used. As such, the emission calculations and AQ520 were not updated for this requested change.

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).

The daily value in tab 2 of the AQ520 form was updated to match the Daily throughput number given in the storage tanks tab of 12,161 gallons per day.

c. In the Unpaved Roads tab, update the units in cells B31, C31, and D31 to have units of lb/VMT.

The units were updated in the Unpaved Roads tab

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.

As discussed with Heather Kuoppamaki on March 17, 2026, the 90% fugitive dust control is based on the Western Region Air Partnerships (WRAP) Fugitive Dust Handbook, Table 9-4, which lists the control efficiencies for control measures for storage pile wind erosion. This value was used as it is given specifically for PM10 control efficiency for watering the storage piles. The previously approved AP-42 value of 85% uses an average of a range given, but applies to PM generally. The cover letter for the previous emission inventory submission explains the fugitive dust control practices used at the site.

If you have any questions or comments about the information presented, please do not hesitate to contact Greg Nostrand with Trinity Consultants at Greg.Nostrand@trinityconsultants.com or myself at karon.brown@imerys.com.

Sincerely,

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