



Oregon

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Sent electronically only

Tony Valladares,

DEQ called in the ATI Specialty Alloys & Components, LLC (ATI) facility in Millersburg, OR to the Cleaner Air Oregon (CAO) program on September 5, 2025. On November 18, 2025, DEQ received a request from ATI for a partial extension of the deadline for submittal of the CAO Emissions Inventory (Inventory). Given the complexity of ATI's operations, DEQ plans to review partial Inventory submittals and provide comments on these partial submittals to ATI on an ongoing basis. DEQ received the submittal of the first part of ATI's Inventory (Inventory Part 1) on December 4, 2025 (Your DEQ Online Submittal ID 72766). In accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), DEQ issued a written request on January 30, 2026, requiring additional information and revisions. DEQ received the revised Inventory Part 1 and the Inventory Part 2 on February 19, 2026. DEQ issued a written request on March 13, 2026, requiring additional information and revisions to the Inventory Parts 1 and 2 to be submitted by April 17, 2026. To date, DEQ has received the following partial Inventory submittals:

- Inventory Part 1: Process flow diagrams; Categorically Exempt Toxics Emissions Units (TEUs) Form AQ523; and emissions information (AQ520 form) for the natural gas combustion and emergency engine TEUs. Inventory Part 1 was initially submitted on December 4, 2025. Revisions were received on February 19, 2026, and April 17, 2026. Emissions for these TEUs were combined in a single AQ520 with the TEUs from Inventory Part 1.
- Inventory Part 2: Emissions information (AQ520 form) for all cooling towers, pickling tanks, and abrasive blasting TEUs submitted on February 19, 2026. Revisions were received on April 17, 2026.
- Inventory Part 3: Revised process flow diagrams and emissions information (AQ520 form) for miscellaneous processes with baghouse controls, EU2 tanks with scrubber controls, and gasoline dispensing facility TEUs submitted on April 17, 2026. Emissions for these TEUs were combined in a single AQ520 with the TEUs from Inventory Parts 1 and 2.

DEQ has reviewed the partial Inventory submittals and identified additional updates that are needed before approval. In accordance with [OAR 340-245-0030\(4\)\(b\)](#), DEQ is providing ATI with a revised deadline for submittal of a revised Inventory. Please submit the information specified below by **42 days** after the issuance date of this letter, or **July 9, 2026**.

General Comments

1. Toxic Emission Units (TEUs) in the Inventory must 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/TEU/TESU naming between the permit (when applicable), Inventory, and other supporting materials, especially with respect to the use of spaces, underscores, and hyphens/dashes. As an example, ATI has an Aggregate Insignificant EU in their Title V permit with an EU ID of "AI." This EU is also a TEU and it is therefore included in the Inventory where the TEU ID is listed as both "EU-AI" and "EU_AI" in different instances, while "EU AI" is used in the process flow diagram.
2. ATI should not add supplemental worksheets to the AQ520 Inventory Form. Supporting calculations necessary for a review of the Inventory must still be submitted to DEQ but should be supplied as a separate workbook.
3. Ensure references included in the AQ520 form (Column L of Worksheet 3 and Column K of Worksheet 5) are sufficiently descriptive to describe how the emission factors and/or emission estimates were developed. The reference should include the following as appropriate: reference for emission factor or emissions calculation methodology (sufficient for the reviewer to find the referenced document); capture efficiency reference(s); destruction and removal efficiency reference(s); source/method of TAC speciation; and any other relevant assumptions incorporated. For some complicated emission calculations (such as evaporative loss from tanks), it may not be feasible to include a full description of the emissions methodology and references for all chemical parameters used to develop the emission estimates, but a general description is expected. DEQ has addressed requested updates in the "Specific Comments" section.

Specific Comments

1. **Alloy Production:** Provide an estimate of the total production for ATI's PTE basis for each alloy. ATI has provided SDSs for 6 alloys produced and processed at the facility. Review of this information shows that the metal TAC content of these alloys varies widely. Therefore, understanding the alloy production profile will help DEQ assess the applicability of reference TAC speciation profiles where site specific data is not available.
2. **Process Flow Diagram (PFD):**
 - a. The TESU/Stack ID for the EU-2 Ammonia Recovery Lime Silo on the Chemical Operations Process PFD (S48) differs from that in the Inventory (S146). Review and revise as appropriate.
 - b. The Fabrication Process PFD assigns a TESU/Stack ID of S30 for the EU-4 "BL09 BH." This is the same TESU/Stack ID assigned to the EU-06 Thermite TESU. Ensure that there are no duplicate identifiers for independent activities. Review and revise as appropriate.
3. **Safety Data Sheets:** DEQ reviewed the safety data sheets (SDSs) noted in Column I of the "Emission Inventory Part 3 Submittal List.xlsx" workbook. Based on this review, DEQ has the following additional data needs.
 - a. Confirm that the "SDS_Coke.pdf" file is the correct SDS for the petroleum coke material as the SDS names the product as activated carbon.
 - b. Provide a copy of the SDS for the C103 Niobium alloy processed at the Powder Met Baghouse (EU-6).
4. **Pollution Control Devices:**

- a. Provide a summary table of the pollution control devices included in the Inventory to date which includes the following information:
 - i. Control device ID;
 - ii. Process controlled. Include TEU and/or TESU IDs;
 - iii. Control device type (such as baghouse or scrubber);
 - iv. Control device manufacturer;
 - v. Control device installation date. Include dates of any modifications;
 - vi. Air flow rate (acfm);
 - vii. Pollutant controlled and removal efficiency;
 - viii. Filter information (for baghouses); and
 - ix. Date of last source test.
 - b. Provide references for all removal efficiencies used in the Inventory. Provide documentation from manufacturers to support these removal efficiencies (including design filter and/or design specifications).
 - c. Permanently offline baghouses: In the submittal to DEQ on April 8, 2026, ATI indicated that many of the baghouses in their current permit are no longer operating. Please provide copies of submittals and/or related approvals documenting the facility changes associated with removal of permitted baghouses.
5. **Metals Acid Cleaning (TEU EU-12, TESUs B42 and S42):**
- a. Update the partial pressure for hydrogen fluoride (CASRN 7664-39-3). For solution compositions which are not presented in the tables, ATI may either extrapolate between the available data or assume conservative partial pressures from the available data.
 - b. Confirm the tank composition of tank A2. The tank contents are listed as “Zr Acid Mix” but composition for “SPO Acid Mix” is used in the tank calculations.
6. **Thermite (TEU EU-06, TESU S30):**
- a. Provide additional details on the development of ATI’s emission factor for the thermite process.
 - b. Revise the calculation of weight percentage of barium (CASRN 7440-39-3) in barium oxide (CASRN 1304-28-5) used in the “06_Thermite” worksheet added to the AQ520 form. Barium (atomic weight of 137.33) accounts for approximately 89.6 percent of the weight of a molecule of barium oxide (molecular weight of 153.33).
7. **Gasoline Dispensing Facility (TEU EU_GDF):** DEQ has reviewed the “Horizontal tank” worksheet included in the AQ520 and has the following comments to be addressed:
- a. Vent setting correction factor (K_B), Row 66: Based on information presented elsewhere in the calculations, the breather vent settings are within ± 0.03 psig (see cell D32) and per notes for equation 1-37, K_B should be 1.¹ If the breather vent settings are greater than ± 0.03 psig, address the necessary changes elsewhere in the calculations; and
 - b. Update the calculations for the following parameters to use the associated monthly meteorological data from Rows 43 through 47:
 - i. Average vapor Temperature (T_V), Row 69: Update insolation factor;
 - ii. Daily average liquid surface temperature (T_{LA}), Row 70: Update insolation factor;
 - iii. Daily vapor temperature range (ΔT_V), Row 71: Update insolation factor;

¹ EPA. September 2025. AP-42 Chapter 7.1, Section 7.1.3.1 “Routine Losses From Fixed Roof Tanks.”
https://www.epa.gov/system/files/documents/2025-09/c7s1_2025.pdf

- iv. Daily maximum ambient temperature (T_{AX}), Row 73: Update maximum temperature;
- v. Daily minimum ambient temperature (T_{AN}), Row 74: Update minimum temperature; and
- vi. Liquid bulk temperature (T_B), Row 76: Update insulation factor.

8. **Tank TESUs (TEU EU-02):**

- a. To reduce confusion and aid in the CAO review process, ensure consistency in tank naming and include TESU IDs in supporting calculation worksheets.
- b. Confirm how tank compositions are developed. If compositions were determined from SDSs, provide copies of these for DEQ to review.
- c. Per Specific Comment 4.b, provide documentation from the scrubber manufacturer(s) to support the stated removal efficiencies. If manufacturer data is not available, provide additional description of the control devices and references for removal efficiencies in similar applications.
- d. **Storage Tanks (TESUs S21_C, S23, S33, and S35):**
 - i. Provide justification for the assumption that emissions are only generated from filling activities at these tanks. Include in this justification a discussion of tank ventilation sufficient to address why these tanks have no standing losses.
 - ii. Confirm how the daily throughputs were developed and whether these represent the actual storage capacity of the tanks or the “working” volume of the tank. Note any assumptions that were made in developing these throughputs.
 - iii. Confirm that the storage tanks are maintained at ambient pressure as is assumed in the tank calculations.
 - iv. Provide updated references for all chemical properties, assumptions, and calculations used in development of the TAC emission estimates presented in the “Storage Tank” worksheet. Additionally, include appropriate labels and units for all parameters.
 - v. Review calculations and ensure the appropriate tank volume unit conversions are included.
 - vi. DEQ was unable to match the Antoine coefficients used in partial pressure calculations in the “Storage Tank” worksheet against information presented in Perry’s Chemical Engineers’ Handbook.² Update the references to include specific tables or sections referenced from Perry’s Chemical Engineers’ Handbook. Alternatively, estimate the partial pressure for the tank contents using partial pressure data presented in the following tables from Perry’s Chemical Engineers’ Handbook.² For solution compositions and/or temperatures which are not presented in the tables, ATI may either extrapolate between the available data or assume conservative partial pressures from the available data.
 - 1. For partial pressures of water and hydrochloric acid (CASRN 7647-01-0) in aqueous solutions of hydrochloric acid see Tables 2-11 and 2-12, respectively. Note, these tables do have Antoine coefficients which are dependent on the composition of the solution. However, these tables note that the partial pressure information in the tables “is more nearly correct;”²

² Green, Don W. and Perry, Robert H (Eds.). 2008. *Perry’s Chemical Engineers’ Handbook* (8th ed.). New York: McGraw-Hill.

2. For partial pressures of water and ammonia (CASRN 7664-41-7) in aqueous solutions of ammonia see Tables 2-23 and 2-25, respectively; and
 3. For partial pressures of water, sulfur trioxide (CASRN 7446-11-9), and sulfuric acid (CASRN 7664-93-9) in aqueous solutions of sulfuric acid see Tables 2-14, 2-15, and 2-16, respectively.
- vii. Concentrated HCL tank (TESU S23): Information presented in the “Storage Tank” and “Tank Scrubber” worksheets indicates that this TESU includes two Concentrated HCl storage tanks. If so, update the emission calculations to account for double the tank throughput. Additionally, confirm that the volume/capacity of the Concentrated HCl tank(s) is correct and consistent across the information presented in the Inventory and supporting calculations.
 - viii. Ammonia Recovery HCl Storage tank (TESU S33): Provide estimates for the maximum daily throughput, annual throughput, and the stored material’s composition.
- e. **Process Tanks (TESUs S21_D, S31, and S36):**
 - i. Dilute H2S04 Tank (TESU S21_D): Based on the throughputs, tank parameters, and composition information provided by ATI, DEQ has approved the Dilute H2S04 Tank TESU as an Exempt TEU for the purposes of CAO under [OAR 345-245-0060\(3\)\(a\)](#). Exempt TEUs must be listed in Worksheet 2 of the revised AQ520 form requested under Specific Comment 10, but there is no requirement to include activity levels for this TEU and it can be excluded from Worksheet 3 as you do not need to estimate emissions for Exempt TEUs.
 - ii. Ammonia Recovery Feed Mix and Feed Storage tanks (TESUs S31 and S36): ATI notes that liquid levels in these process tanks is maintained at a constant level and therefore has not estimated working losses from these tanks. Provide additional details on the operation of these tanks to support this assertion.
9. **Cooling Tower TEU:** DEQ has reviewed annual usage rates and dosage targets provided by ATI along with the SDSs for the cooling tower water treatment materials. Based on the conditions of use of these materials, TAC content, and the low target concentrations in the cooling tower recirculation water, DEQ has approved the Cooling Tower TEU as an Exempt TEU for the purposes of CAO under [OAR 345-245-0060\(3\)\(a\)](#). Exempt TEUs must be listed in Worksheet 4 of the revised AQ520 form requested under Specific Comment 10, but there is no requirement to include activity levels for this TEU and it can be excluded from Worksheet 5 as you do not need to estimate emissions for Exempt TEUs.
10. **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. Per General Comment 2, remove supplemental worksheets added by ATI to the AQ520 form. Submit supplemental calculations in a separate workbook.
 - b. Incorporate any revisions to the Inventory required after addressing Specific Comments 2 through 9.
 - c. Update the TEU Descriptions in Column C of Worksheet 2 to refer to the emissions generating activities, not the control device. The activity venting to a control device is considered the TEU, not the control device itself. Update the TEU/TESU description in Column C of Worksheet 2 for the following TESUs:
 - i. Extrusion Press cell BH1 (TEU EU-AI, TESU S71-1);

- ii. Extrusion Press Cell BH2 (TEU EU-AI, TESU S71-2);
 - iii. Ammonia Recovery Lime Silo Baghouse (TEU EU-AI, TESU S146); and
 - iv. Thermite Baghouse (TEU EU-06, TESU S30).
- d. Per General Comment 1, ensure consistency in TEU naming across the Inventory. The following TESUs have different TEU identifiers then are used elsewhere in the Inventory for the same TEU:
 - i. Ammonia Recovery Lime Silo Baghouse (TESU S146) TEU ID is listed as “EU_AI,” but “EU-AI” is used previously in the Inventory; and
 - ii. Thermite Baghouse (TESU S30) TEU ID is listed as “EU_06,” but “EU-06” is used previously in the Inventory.
- e. Confirm the Control Device ID in Column C of Worksheet 2 for the following TESUs. The ID in the Inventory differs from information presented in the Permit Review Report.
 - i. Thermite Baghouse (TEU EU-06, TESU S30);
 - ii. Ammonia Recovery Feed Mix Storage (TEU EU-02, TESU S36); and
 - iii. Ammonia recovery HCL Storage (TEU EU-02, TESU S33).
- f. **Abrasive Blasting TESUs:**
 - i. Garnet Blasting (TEU EU-4; TESUs S41, S43, and S32): Include emission estimates for barium (CASRN 7440-39-3) from garnet blasting activities using the metal speciation data in Table 5 of ATI’s abrasive blasting emissions reference.³
 - ii. Blaster BL 03 (TEU EU-04, TESU S43): Revise the TESU assignment for Row 661 of Worksheet 3. The TESU assignment is for TESU S26, but the referenced emission factors are for TESU S43.
- g. **Metals Acid Cleaning TESUs (TEU EU-12, TESUs B42 and S42):** Update the activity basis listed in Worksheet 2 for these two TESUs to be consistent.
- h. **Thermite (TEU EU-06, TESU S30):** Revise the emission factor for barium (CASRN 7440-39-3) per Specific Comment 6.b.
- i. **Gasoline Dispensing Facility (TEU EU_GDF):**
 - i. Unless there are multiple sub-units to this TEU, ATI should not define a TESU. Therefore, if there is no TESU for the GDF TEU, leave Column B blank in both Worksheets 2 and 3.
 - ii. Update the activity basis on Worksheet 2 to be in gallons of gasoline as that is the basis of the VOC emissions estimates used to estimate TAC emissions. Likewise, update the TAC emission factors in Worksheet 3 to be on the same basis.
 - iii. Update emission estimates as appropriate based on updates incorporated after addressing Specific Comment 7.
 - iv. There are multiple TACs for which the entered CASRN in Column C of Worksheet 3 is not recognized and the associated cells in Columns C and D are highlighted. DEQ’s review of the entered CASRN show they are correct, so this is most likely a formatting issue resulting from copying data into the AQ520 form. Address the CASRN entry error for the following TACs:
 - 1. 1,3,5-Trimethylbenzene (CASRN 108-67-8);
 - 2. 2,2,4-Trimethylpentane (CASRN 540-84-1);
 - 3. 2-Methyl naphthalene (CASRN 91-57-6); and

³ Kura, Bhaskar. 2005. *Residual Risk from Abrasive Blasting Emissions: Particle Size and Metal Speciation*. Advanced Technology Institute. https://www.nsrp.org/wp-content/uploads/2015/09/Deliverable-2006-317-Residual_Risk_Abrasive_Blasting_Final_Report-Bhaskar_Kura.pdf

4. Naphthalene (CASRN 91-20-3).
 - v. ATI has over reported emissions of xylene from this TEU as both the individual isomers and xylenes mixture (CASRN 1330-20-7) have been included in Worksheet 3. Delete rows for the individual xylene isomers and only report emissions under the xylenes (mixture) TAC.
 - vi. Revise the “Reference/Notes” in Column L of Worksheet 3 to delineate the multiple references included. For example, clarify the references used for the annual emission estimates and those for the daily emission estimates.
- j. **Tank TESUs (TEU EU-02):**
- i. Include the type of control device along with the device ID in Column C of Worksheet 2 for the following tank TESUs:
 1. Dilute H₂S₀₄ Tank (TESU S21_D);
 2. Concentrated H₂S₀₄ Tank (TESU S21_C); and
 3. Ammonia Recovery NH₄OH storage (TESU S35).
 - ii. Update the TEU/TESU description in Column C of Worksheet 2 for all tanks TESUs to include “tank” in the description. The following TESUs are understood to be tanks but are missing this description:
 1. Ammonia Recovery Feed Mix Storage (TESU S36);
 2. Ammonia recovery HCL Storage (TESU S33); and
 3. Ammonia Recovery NH₄OH storage (TESU S35).
 - iii. Dilute H₂S₀₄ Tank (TESU S21_D): Per Specific Comment 8.e.i, ATI may include TESU S21_D as an Exempt TEU. This TESU must be included in Worksheet 2, but there is no requirement to include activity levels for this TESU and it can be excluded from Worksheet 3 as you do not need to estimate emissions for Exempt TEUs.
 - iv. Concentrated HCL tank (TESU S23):
 1. The PTE maximum daily throughput for this TESU on Worksheet 2 is less than the actual maximum daily throughput and differs from information presented in the “Tank Scrubber” worksheet. Review and revise as appropriate.
 2. Per Specific Comment 8.d.vii, information presented in ATI’s supplemental calculation worksheets indicates that this TESU includes two (2) concentrated HCl storage tanks. If so, update the TEU/TESU Description in Column C of Worksheet 2 to note this. Both tanks can be represented as a single TESU as long as they vent through a shared stack (or control device).
 - v. Ammonia Recovery Feed Mix Storage (TEU EU-02, TESU S36): The PTE annual (Column J) and actual maximum daily (Column L) throughputs for this TESU in Worksheet 2 reference the incorrect tank information from the “Tank Scrubber” worksheet. However, the referenced tank data does have equivalent throughputs so emissions estimates in Worksheet 3 should be not be impacted by the error.
 - vi. Per General Comment 3, revise the “Reference/Notes” in Column L of Worksheet 3 for these TESUs to describe how emission estimates were developed for these TESUs. Per General Comment 2, the AQ520 should not include additional worksheets added by ATI and therefore, the information in the AQ520 should provide as complete a description of the emission estimates as possible.

k. **Cooling Tower TEU:**

- i. Remove the TESU assignments for the individual materials listed under this TEU in Column B of Worksheet 4. Usage of multiple materials can be accounted for under a single TEU.
- ii. Include a TEU description in Column C of Worksheet 4 in addition to the statement about the exempt status of the TEU. Note the total number of cooling towers.
- iii. Include the material name, currently listed in Column B of Worksheet 4, in Column E and include the material's manufacturer in Column F.
- iv. DEQ has reviewed the SDS for the ChemTreat CL2150 material and it contains no TACs. Therefore, this material should be removed from Worksheet 4.

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 with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of [OAR 340-245-0030\(4\)\(b\)](#).

If you have any questions regarding this letter please contact me directly at (971) 300-3653 or amy.devita-mcbride@deq.oregon.gov. I look forward to your continued assistance with this process.

Sincerely,



Amy DeVita-McBride
Cleaner Air Oregon Project Engineer

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