Trinity Consultants
111 SW Columbia St, Ste 1100, Portland, OR 97201 / P 503.713.5550 / **trinityconsultants.com**

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Heather Kuoppamaki
Cleaner Air Oregon Project Engineer
Oregon Department of Environmental Quality
700 NE Multnomah St., Suite 600
Portland, OR 97232-4100
heather.kuoppamaki@deq.oregon.gov

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

Imerys submitted a revised Cleaner Air Oregon (CAO) emission inventory on October 10, 2025, for the Imerys Perlite USA, Inc. (Imerys) Lakeview, OR facility. Imerys received a response from the Oregon Department of Environmental Quality (ODEQ) on December 16, 2025, regarding questions and requested revisions on the latest CAO emission inventory submittal. Imerys has revised the CAO inventory in response to the comment letter and is enclosing provided updated versions of the AQ520 Form and supporting emissions calculations. The comment letter's points are below in italics and the responses in bold. This cover letter serves to answer the points made in the comment letter and address where changes were made in the emission calculations.

1. *Provide the following **additional information**:*

   a. Submit to DEQ additional information and updates to the Tank ESP model used to estimate emissions from the following Toxics Emissions Units (TEUs) per OAR 340-245-0040(4)(b)(C): i. Tanks (TEUs TANK1 and TANK2): Provide "Show Calculation Steps" spreadsheet outputs from the Tank ESP model for the following scenarios:

      1. Short term emissions, estimated using the Texas Commission on Environmental Quality (TCEQ) method (an option in Tank ESP); and
      2. Annual emissions.

   Imerys revised the short term emission calculations for TEUs Tank1 and Tank2 using the requested Texas Commission on Environmental Quality (TCEQ) methodology. For the throughput, Imerys conservatively assumed that each tank was filled entirely (i.e., one full tank turnover) in a single day. This is considered conservative because the dryer would need to be operational, meaning either tank could not be completely empty. Additionally, Imerys has provided the "Show Calculation Steps" which are located in the supporting emission calculations workbook for the annual emissions which was obtained from Tank ESP.

   b. Provide additional information on the fugitive dust management conducted at the facility for the stockpiles. Include wet suppression technique(s) used, frequency and amount of wetting of the stockpiles, as well as type of wetting material used.

   Water and lignin material are the two dust suppressant materials used onsite. Water is applied whenever visible emissions are detected and especially during the dry season, this type of wet suppression is applied more frequently. In advance of particularly windy days, Imerys also applies water to prevent dust emissions from the stockpiles.

Lignin is applied on the truck travel ways especially during the summertime to minimize dust emissions.

c. Provide information on the variation in the size, including total footprint, surface area, and height, of the active and inactive stockpiles onsite.

Imerys utilized historic stockpile size information, recent stockpile measurements and Google Earth imagery to assess worst case stockpile size and heights. The most conservative height, surface areas and total size of the stockpiles were chosen to estimate worst case emissions. Imagery was largely relied on since it shows the extent of the piles and this imagery has been provided in the emission calculation workbook for ODEQ's reference.

2. DEQ has determined that Klamath Falls is not representative of the Lakeview area due to the significant terrain and distance between the two communities. DEQ understands the Lake County Regional Airport does not have ASOS data and therefore would have increased calm winds compared to an ASOS station. Regardless, DEQ feels that this site is more representative of meteorological conditions in Lakeview and recommends its use in this assessment. Please review any data substitution options to reduce the number of calm winds in the final dataset.

Please revise and submit supporting calculations using the most recent Lake County Regional Airport meteorological data for the following:

a. *Drop points emissions estimate calculations in the **Imerys CAO inventory calculations** workbook.*

Emission calculations for the drop points have been revised in the supporting emission calculation workbook using the updated met dataset.

b. *Stockpiles emissions estimate calculations in the **Imerys CAO inventory calculations** workbook.*

Emission calculations for the stockpiles have been revised in the supporting emission calculation workbook using the updated met dataset.

c. Risk Assessment modeling, if a Level 3 or Level 4 Risk Assessment is conducted.

Five years of surface meteorological data, from 2020 to 2024, were taken from the nearest airport with available data, Lake County Airport (Station ID: KLKV; WBAN ID: 94285) as recommended by ODEQ. The upper air data is taken from the most representative upper air station in Medford, Oregon (Station ID: KMFR; WBAN ID: 24225) for the corresponding period. The meteorological data is processed using AERMET version 24142 using regulatory default options following EPA's guidance on AERSURFACE and AERMET. The ADJ_U* option was used to account for low wind speed more accurately under stable atmospheric conditions. The total percentage of calm wind data is 10.88% for the modeled period.

The Lakeview County Airport (KLKV) meteorological station is located approximately 3.5 kilometers to the southwest of the facility. The terrain of the proposed facility and of the Lakeview County Airport are similar due to their proximity. Because of the site's proximity to the Lakeview County Airport, the similar terrain between the two sites, and the recency of the meteorological dataset, the selected surface station dataset is considered representative for the proposed facility. The Medford, OR (KMFR) station is approximately 208 km away from the site, and the elevation is approximately 407 meters. The KMFR station is located in similar terrain and in a location with moisture characteristics that are similar with those found in the Lakeview area. Therefore, meteorological data processed with the upper air data from the KMFR station will be used for this assessment.

3. Provide a revised CAO Emissions Inventory AQ520 form that includes the updates and revisions required below:

a. In Tab 2, Column F, update the units for the Active Stockpile – Material Handling Emissions and the Inactive Stockpile – Material Handling Emissions (TEUs ASMH and ISMH) to tons ore.

The units have been updated in enclosed AQ520 Form.

b. Any updates required to reflect updated emissions estimates as a result of satisfying Comments 1 and 2, above.

All emission updates have been included in the enclosed AQ520 Form.

4. Provide revised Imerys CAO inventory calculations that include the updates and revisions required below:

a. Any updates required to satisfy Comments 1 and 2, above.

Imerys has enclosed the revised emission calculations.

b. On the "stockpiles" tab, the surface area of the stockpiles should be used for calculating daily and annual emissions instead of the footprint area. Please include assumptions and supporting justification for the methods used to calculate surface area.

Imerys has provided imagery as well as various footnotes justifying the selection of updated parameters used to calculate emissions from the stockpiles.

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,

Karon Brown
Imerys Perlite USA

Cc: Greg Nostrand, Trinity Consultants
Jesse Gonzalez, Trinity Consultants
David Dooley, Imerys Perlite