ATI Millersburg
1600 Old Salem Rd.
PO Box 460
Albany, OR 97321-0460

+1-971-453-2440

June 24, 2026

Amy DeVita-McBride – CAO Project Engineer
Oregon Department of Environmental Quality
700 NE Multnomah Steet, Suite 600
Portland, Oregon 97232

**Submitted via YDO**

Re: Extension Request for Submittal of the Cleaner Air Oregon Emission Inventory and Supporting Documents

Dear Ms. Devita-McBride:

ATI Specialty Alloys & Components (ATI) received written notice from the Oregon Department of Environmental Quality (DEQ) on September 5, 2025 that our Millersburg, Oregon facility was being called into the Cleaner Air Oregon (CAO) program.

Since that date ATI has submitted 3 partial inventories and responses to comments from DEQ.

The 4th emission inventory deadline was included in your letter dated April 10, 2026, established a submittal deadline of July 9, 2026, and includes the Grinding 3:1 Baghouse (EU-04), Micro Grind Baghouse (EU-AI), Chloride Can fugitives, and facility-wide MIBK use TEUs.

ATI submitted the third emission inventory submission on April 17, 2026 and DEQ responded to that submission requesting additional information on May 28th, 2026. This response set July 9, 2026 as the deadline as for those questions as well. ATI appreciates DEQ's detailed responses to the partial emission inventories submitted so far. ATI anticipates that they can fully respond to DEQ's question on the third submission information by the July 9th deadline.

ATI has determined that it will require an extension to a portion of the 4th Inventory submittal. Specifically, we are requesting an extension to the Inventory for the Grinding 3:1 Baghouse (EU-04) in order to conduct stack testing of that unit.

We believe that this request is consistent with the criteria in OAR 340-245-0030(3). First, the request is being made no fewer than 15 days prior to the submittal deadline. Second, ATI has made significant progress in preparing the EI and supporting information for the 4th submission and responding to the third EI submission. Specifically, we are in the process of drafting emission calculations for the facility wide MIBK use, and the Chloride Can fugitives. We have conducted two meetings with DEQ on the baghouse stack testing and discussed the plan to potentially determine fugitive emissions produced by the grinding operations. We have also submitted requests for quotes from multiple stack testing vendors, and have preliminarily scheduled a stack testing event.

Third, the delay is necessary, for good cause, to enable ATI to obtain more accurate, new data from the proposed testing campaign (i.e., additional analyses). Due to the availability of stack testing and the

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requirement to completely reserve the ATI 3-in-1 grinding area, additional time is needed for ATI to develop the inventory for the Grinding 3:1 Baghouse. ATI is requesting an extension to the inventory submission for that activity. ATI has established a stack testing date of 09/15/2026 and 09/16/2026. ATI understands they will need to submit a stack testing plan at least 30 days prior to this testing date. After the testing date ATI will submit the stack test report within 60 days. Once the stack test is approved (anticipated within 30 days) ATI requests 30 days to include the information in the inventory and submit. Ultimately ATI proposes 120 days past the planned stack testing day to submit this part of the inventory. This date is expected to be January 14th 2027.

Accordingly, ATI will submit all other required items in the 4th emission inventory and the response to the third emission inventory by July 9th.

ATI is committed to developing a thorough, representative CAO EI and respectfully requests that DEQ grant additional time for this effort, as proposed. We look forward to continued collaboration with DEQ throughout the CAO process. Please contact Mike Riley at Michael.riley@atimaterials.com with any questions regarding this extension request.

Sincerely,

Submitted via YDO

Tony Valladares