

June 18<sup>th</sup>, 2021

Max Hueftle, P.E., BCEE  
Permit Section Manager  
Air Section, Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477

Dear Mr. Hueftle;

Hexion Inc.'s ("Hexion") Springfield site (the "Site") was officially "called into" the Cleaner Air Oregon (CAO) program on January 4, 2021. As part of call in process, Hexion was initially required to file a completed CAO Emissions Inventory Form (AQ405CAO) by April 4, 2021 but was granted an extension from the Lane Regional Air Protection Agency (LRAPA) on February 12, 2021 to submit the form by July 5, 2021 to coincide with the end of Hexion's "new owner audit" with the US EPA. This audit assesses the review of emissions and reporting associated with the Toxic Release Inventory (TRI) report which may also impact emissions related information required to be submitted in the CAO Emissions Inventory Form.

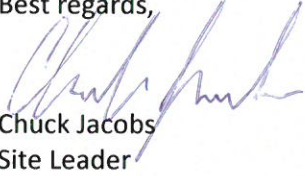
Recently, US EPA approved an extension of time until December 1, 2021 for Hexion to complete and submit its final consolidated new owner audit report to US EPA. The extension was approved to allow Hexion to continue refining the complex inputs and emissions calculations for TRI reportable chemicals. These refinements are expected to directly impact required emissions related information for toxic air pollutants required to be submitted under Oregon Administrative Rule (OAR) 340-245, *Cleaner Air Oregon*. As such, Hexion is officially requesting an extension to submit the required CAO Emission Inventory Form to LRAPA by December 1, 2021, to allow Hexion sufficient time to continue to refine inputs and emissions calculations during the new owner auditing process and effectively incorporate any updates resulting from that process into the CAO Emission Inventory Form. As part of this refinement, Hexion will be conducting the following:

- Liquid sampling to determine more representative concentrations of regulated toxic air pollutants under OAR 340-245 in various process streams at the Site
- Refining systems to track material movements and potential emission points to include in the inventory and subsequent required CAO submittals
- A comprehensive update of tank emission calculations, including a detailed review of current tank characteristics and parameters to be consistent with the recent updates to AP-42 emission calculation methodologies.

Pursuant to the requirements of OAR 340-245-0030(3), Hexion is submitting this extension letter more than fifteen days prior to the current submittal deadline, the Site has made demonstrable progress on preparing the CAO Emission Inventory Form and the extension will allow Hexion to obtain the information listed above, which is expected to have an impact on the data submitted. Ultimately, this extension will allow Hexion to ensure the submittal is complete and accurate, as well avoid future potential revisions due to information obtained during the new owner audit if not granted the extension request.

For any questions or clarification, please contact me at [chuck.jacobs@hexion.com](mailto:chuck.jacobs@hexion.com) or Rebecca Truka at [rebecca.truka@hexion.com](mailto:rebecca.truka@hexion.com).

Best regards,

A handwritten signature in blue ink, appearing to read "Chuck Jacobs". The signature is stylized and overlaps with the printed name below it.

Chuck Jacobs  
Site Leader