



COLUMBIA STEEL CASTING CO., INC.

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July 30, 2021

Ms. Kenzie Billings
DEQ CAO Project Manager
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Re: Cleaner Air Oregon Extension Request – Responses to DEQ Comments on the
Air Toxics Emissions Inventory and Combined Modeling Protocol and Risk
Assessment Work Plan
Columbia Steel Casting Co., Inc., Portland, Oregon

Dear Ms. Billings,

As part of the ongoing efforts related to Cleaner Air Oregon, Columbia Steel Casting Co., Inc. (Columbia Steel) submitted an Air Toxics Emissions Inventory (Form AQ520) and combined Modeling Protocol and Risk Assessment Work Plan to the Oregon Department of Environmental Quality (DEQ) on May 26, 2021. Follow-up questions and a request for additional information was provided by the DEQ on July 15, 2021 with a due date of August 17, 2021. Columbia Steel is requesting an extension of 30 days to September 16, 2021 for a portion of the responses.

As required by OAR 340-245-0030(3), justification for the requested extension is described below.

- Columbia Steel has demonstrated progress in completing the responses to DEQ's request for additional information. The attached table outlines the items where responses will be provided to DEQ by August 17, 2021.
- The information requested by DEQ requires researching and evaluating additional data, performing additional analyses, completing new emissions calculations, and reviewing operating parameters, all of which require substantial revisions to the air toxics emissions inventory and combined modeling protocol and risk assessment work plan. Examples of substantial revisions include:
 - Material storage pile calculations, which requires obtaining recent information regarding storage pile sizes, gathering of analytical data, and evaluating whether the storage piles meet the criteria of an exempt toxic emission unit (TEU).

July 30, 2021
Page 2

- Updates to the emission factors and calculations in the air toxics emissions inventory related to metals detected during the December 2020 source testing. This includes a detailed review of the sample data from the source test report (front half and back half sample fractions), recalculation of emission factors, and updates to the calculations in the inventory.
- Analysis of the zoning data and significant updates to the tables and figures within the combined modeling protocol and risk assessment work plan.

If you have any questions, please contact Bruce Schacht at (503) 286-0685, x286 or Sarah Kronholm from SLR International Corporation at (503) 709-7039.

Sincerely,
COLUMBIA STEEL CASTING CO., INC.



Bruce Schacht
Environmental Engineer

Cc: Martha Cox, Columbia Steel Casting Co., Inc.
Dave Faust, Columbia Steel Casting Co., Inc.
Sarah Kronholm, SLR International Corporation
Brien Flanagan, Schwabe Williamson and Wyatt

Table 1. Summary of Requested Information

DEQ Comment	Brief Description	Expected Submittal Date
I.	Process flow diagram	Requested extension of September 16, 2021
II.1.a	Cross-reference table	By August 17, 2021
II.1.b	List of exempt TEUs	By August 17, 2021
II.1.c	Emissions from material storage piles	Requested extension of September 16, 2021
II.2.a	Revise emission factors for metals detected during December 2020 source testing	Requested extension of September 16, 2021
II.2.b	Classification of Nickel emissions	This will be completed by August 17, 2021 but will be included in the revised air toxics emissions inventory with a requested extension of September 16, 2021.
II.2.c	SDSs of welding materials	By August 17, 2021
II.2.d	References for emissions calculations	Requested extension of September 16, 2021
II.2.e	Emissions estimates for additional pollutants for electric arc furnaces and induction furnaces	By August 17, 2021
II.2.f	Baghouse dust and sand system fines analytical data	By August 17, 2021
II.2.g	Feedstock composition data	By August 17, 2021
II.2.h	Hexavalent chromium percentages	Requested extension of September 16, 2021
II.3	SDSs for material usage	By August 17, 2021
II.4	Remove a specific material from the inventory	This will be completed by August 17, 2021 but will be included in the revised air toxics emissions inventory with a requested extension of September 16, 2021.
III.1	Consider variable emission rates for the air dispersion modeling	By August 17, 2021
III.2	Verify baghouse stack height and diameter parameters	Requested extension of September 16, 2021
III.3	Exit gas velocities for natural gas ovens	By August 17, 2021
III.4	Revision to statement regarding exposure types	This will be completed by August 17, 2021 but will be included in the revised combined modeling protocol and risk assessment work plan with a requested extension of September 16, 2021.

DEQ Comment	Brief Description	Expected Submittal Date
III.5 – III.7	Revisions to the combined modeling protocol and risk assessment work plan related to exposure locations	Requested extension of September 16, 2021
III.8 – III.9	Revisions to the combined modeling protocol and risk assessment work plan related to specific chemicals	This will be completed by August 17, 2021 but will be included in the revised combined modeling protocol and risk assessment work plan with a requested extension of September 16, 2021.
III.10	No response required	--
III.11	Preliminary uncertainty evaluation	This will be completed by August 17, 2021 but will be included in the revised combined modeling protocol and risk assessment work plan with a requested extension of September 16, 2021.