



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

August 9, 2019

Columbia Steel Casting Co., Inc.
P.O. Box 83095
Portland, OR 97283

Re: Cleaner Air Oregon Extension Request

Mr. Schacht,

DEQ received written notification from Columbia Steel Casting Co., Inc. (Columbia Steel) on July 17, 2019 requesting an extension of time for the submittal of their Source Test Plan, Source Test Report, updated Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan.

DEQ called Columbia Steel into the Cleaner Air Oregon (CAO) program on March 4, 2019. On April 26, 2019, Columbia Steel notified DEQ that source testing would be completed in support of emissions data for CAO by August 1, 2019. DEQ acknowledged Columbia Steel's proposal on April 29, 2019, extending the submittal date for the Source Test Report, Emissions Inventory, and Risk Assessment Work Plan to August 1, 2019 in accordance with [OAR 340-245-0030(3)]. Columbia Steel submitted an extension request to DEQ on July 17, 2019 outlining the following proposed source test schedule:

1. Source Test Plan submittal to DEQ: at least 30 days prior to beginning source testing (expected August 24, 2019)
2. Source Testing: September 23 – October 2, 2019
3. Source Test Report submittal to DEQ: within 60 days of source testing completion (expected December 1, 2019)
4. Updated Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan submittal to DEQ: within 60 days of Source Test Report submittal (expected to be January 30, 2019)

DEQ grants this extension as outlined in requests 1-3 above for the following reasons:

1. Due to the complexity and volume of expected testing, source test planning took over six weeks, including additional source testing requirements for the upcoming renewal of the facility's Standard Air Contaminant Discharge Permit.
2. The proposed source testing is expected to take approximately two weeks. Columbia Steel has a scheduled rolling maintenance outage from mid-July through mid-August during which source testing cannot be completed. In addition, source testing cannot be completed during or immediately prior to a holiday. The first available window for testing is September 23 – October 2, 2019.

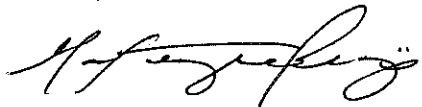
DEQ grants an extension for request number 4 with the following modification:

DEQ anticipates that its review of the submitted Source Test Report will take two to four weeks. Columbia Steel will then have **30 days** after receiving the DEQ approved Source Test Report to submit the revised Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan (if applicable).

This approved extension timeline presumes Columbia Steel will communicate any questions or clarifications regarding the above comments in order to provide timely and complete submittals. DEQ is available to collaborate with Columbia Steel during this timeline to review sequenced sections of the Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan to facilitate this process.

Please contact me directly at (503.229.5247, billings.kenzie@deq.state.or.us), and we look forward to your continued assistance with this process.

Sincerely,



Kenzie Billings
DEQ CAO Project Manager

Cc: Keith Johnson, DEQ
J.R. Giska, DEQ
Thomas Rhodes, DEQ
Matt Hoffman, DEQ
David Graiver, DEQ
Sarah Kronholm, SLR
File