



Oregon

Kate Brown, Governor

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January 5, 2022

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

RE: Warning Letter with Opportunity to Correct
Columbia Steel Casting Co., Inc.
2022-WLOTC-6775
26-1869-ST-01
Multnomah County

Ms. Cox,

DEQ has completed its review of Columbia Steel Casting Co., Inc.'s (CSCC) revised Emissions Inventory (Inventory), submitted on November 30, 2021. This revised Inventory was required by DEQ in an October 27, 2021 letter pursuant to OAR 340-245-0030(2).

Among the corrections required by DEQ in the October 27, 2021 letter, was a requirement to revise the Inventory to include hexavalent chromium emissions from welding activities. However, CSCC's November 30, 2021 submittal still does not include hexavalent chromium emissions from welding activities, and the Inventory must include these emissions. In the cover letter for the November 30, 2021 submittal, CSCC stated:

*The SDSs for welding materials note that hexavalent chromium compounds **may be** present in the welding fume or base metals; however specific concentrations and/or emissions data is not provided. For example, the SDS for the Lincoln 312 SS welding wire states "Materials that contain chromium may produce some amount of hexavalent chromium (CrVI) and other chromium compounds as a byproduct in the fume." This statement is included in the information for personal protective equipment and is not intended to represent specific contents of the material. On behalf of CSCC, SLR has reached out to the suppliers of the welding materials for concentration data for hexavalent chromium. As of the date of this letter, responses have not been received. Because the SDS information is intended to be for potential safety precautions, and does not contain information useful for air toxics emissions data, we have not included hexavalent chromium emissions estimates in the inventory.*

As indicated in DEQ's October 27, 2021 letter, CSCC may use default hexavalent chromium conversion rates consistent with San Diego Air Pollution Control District's guidance for

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estimating welding emissions,¹ but DEQ cannot accept an Inventory that does not contain these emissions.

In addition, CSCC's November 30, 2021 submittal does not clearly correlate sample analysis results to the storage pile emissions estimates in the Inventory. CSCC provided seven total sample results from onsite material piles but only "Sand Slag F, G" and "Fresh Newer Fines E" sample results were used to calculate metals emission rates from storage piles D, E, F, and M. Based on the information submitted by CSCC, DEQ cannot determine that these are exempt TEUs. CSCC must provide sufficient information to substantiate that these TEUs are exempt under OAR 340-245-0060(3) or they must be included as significant TEUs in a revised Inventory.

VIOLATION:

- (1) Failing to submit a complete EI according to OAR 340-245-0040(4)(b). Specifically, CSCC (1) failed to include hexavalent chromium emissions from welding activities, and (2) failed to include sufficient information to support the emissions estimates for the storage piles. This is a Class II violation according to OAR 340-012-0054(2)(i).

Hexavalent chromium is a regulated Toxic Air Contaminant (TAC) under the CAO program with Risk Based Concentrations (RBCs) for both cancer and noncancer health effects. It is a known carcinogen, with noncancer effects including developmental, reproductive and neurological health impacts (ATSDR 2019). Hexavalent chromium emissions could pose serious health risks to the surrounding community. Understanding and controlling potential risks from such emissions is the key goal of the Cleaner Air Oregon program.

Because CSCC has not provided the information described above, DEQ is not able to approve CSCC's Emissions Inventory submittal. According to OAR 340-245-0030(4)(b), DEQ is informing CSCC of the deficiencies in the Emissions Inventory and providing a revised deadline to submit the needed information.

Corrective Action(s) Required. By 30 days of the date of this letter (February 4, 2022), CSCC must submit to DEQ the following:

- 1) Hexavalent chromium emissions estimates for onsite welding activities:** A revised Emissions Inventory including hexavalent chromium emissions estimates for onsite welding activities, prepared consistent with San Diego Air Pollution Control District's guidance, which cites the California Air Resources Board's analysis of American Welding Society data. With DEQ approval, CSCC may use an alternative emissions reporting methodology. If this reporting methodology is used, the facility must also submit a detailed discussion of this methodology, with all supporting data.
- 2) Revise the storage pile emissions calculations to consider all collected samples:** Prepare and submit updated calculations using data from all sands included in the storage piles sufficient for DEQ to determine that these TEUs are exempt. Alternatively, include these TEUs and their emissions in a revised Inventory.

¹ <https://www.sdapcd.org/content/sdapcd/permits/toxics-emissions/calculation-procedures.html>

Should this violation remain uncorrected or should you repeat this violation, this matter may be referred to the Department's Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a Department order. Civil penalties can be assessed for each day of violation. Further, pursuant to OAR 340-245-0030(4)(a), DEQ may modify the information that has been submitted and provide CSCC with a final approved Emissions Inventory for use in completing the CAO process.

Should you have any questions about the content of this letter, please feel free to contact me in writing or by phone at 503.866.8741. In addition, if you desire any follow-up technical assistance, please contact me at Kenzie.Billings@deq.oregon.gov.

Sincerely,

Kenzie Billings, P.E.
Air Toxics Project Manager

Cc: Sarah Kronholm, SLR
Dave Faust, CSCC
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