



Oregon

Kate Brown, Governor

Department of Environmental Quality
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August 4, 2021

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

Re: Cleaner Air Oregon Source Extension Request – Responses to DEQ Comments on the Air Toxics Emissions Inventory and Combined Modeling Protocol and Risk Assessment Work Plan

Mr. Schacht,

DEQ received a written request for extension from Columbia Steel Casting Co., Inc. (Columbia Steel) dated July 30, 2021, to submit supporting information and revisions to Columbia Steel's Toxic Air Contaminant Emissions Inventory (Form AQ520) and Combined Modeling Protocol and Risk Assessment Work Plan. DEQ originally requested these revisions be submitted to DEQ by August 17, 2021, in accordance with OAR 340-245-0030(2).

In accordance with OAR 340-245-0030(3), Columbia Steel requested that the due date for a portion of the responses to DEQ's July 15, 2021, request for revisions and supporting information be extended from August 17, 2021, to September 16, 2021, for the following reasons:

1. Columbia Steel intends to provide response to some of DEQ's requests by August 17, 2021 – see attached table provided on July 30, 2021.
2. Columbia Steel requires additional time to research and evaluate additional data, complete new emissions calculations, and review facility operating parameters, including:
 - a. Evaluate material storage pile emissions [obtain current information regarding storage pile sizes, gather analytical data, and evaluate whether the storage piles meet the criteria of an exempt toxics emissions unit as defined in OAR 340-245-0020(19)].
 - b. Update the emission factors and calculations in the Form AQ520 related to metals detected during December 2020 source testing.
 - c. Analyze zoning data and make significant updates to the tables and figures in the Combined Modeling Protocol and Risk Assessment Work Plan.

Based on the progress Columbia Steel has made towards submitting a significant portion of the requested information by August 17, 2021, as well as committing to submit the remaining items by September 16, 2021, in accordance with OAR 340-245-0030(3), DEQ approves the extension request. Please provide the supporting information and revised submittals as proposed for each item summarized in Table 1 (see attached) from the July 30, 2021, extension request letter. In addition, please provide a status update with your August 17, 2021 submittal for those items you plan to submit by September 16, 2021.

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

Attachment: Table 1. Summary of Requested Information

Cc: Keith Johnson, DEQ
J.R. Giska, DEQ
Anzie St. Clair, DEQ
David Graiver, DEQ
Sarah Kronholm, SLR
Martha Cox, Columbia Steel
Brien Flanagan, Schwabe
File