



Oregon

Kate Brown, Governor

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November 13, 2019

Brien J. Flanagan
Schwabe Williamson & Wyatt
1211 SW 5th Avenue, Suite 1900
Portland, OR 97204

Re: Columbia Steel Casting Co., Inc. Cleaner Air Oregon Extension Request
ACDP No. 26-1869
Schwabe File No. 013239-174213

Mr. Flanagan,

DEQ received written notification from Schwabe on September 17, 2019, on behalf of Columbia Steel Casting Co., Inc. (Columbia Steel) requesting an extension of time for the submittal of their 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 Emissions Inventory 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 a proposed source test schedule. DEQ approved the source test schedule with the exception that Columbia Steel submit the Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan within 30 days of receiving the DEQ approved Source Test Report.

Due to recent changes in production, Columbia Steel requested an extension on September 17, 2019 for implementing the source test protocol and document submission until production resumes its typical schedule.

Columbia Steel proposed to conduct preliminary engineering testing to better understand sample run parameters related to sample volume, detection limits, and expected pollutant concentrations. Columbia Steel also proposes to continue to work through the Modeling Protocol and Risk Assessment Work Plan and proactively meet to discuss anticipated issues with DEQ. Columbia Steel suggested a monthly communication protocol to ensure that DEQ is aware of Columbia Steel's operating level and progress in this process.

DEQ approves these requests with the conditions summarized in the following table:

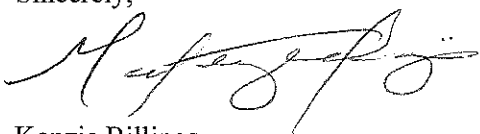
26-1869 Columbia Steel Casting Co., Inc.

Item	Due Date	Comments
Modeling Protocol	Due with Emissions Inventory	Ongoing progress on these documents and discussion with DEQ on anticipated issues is expected.
Risk Assessment Work Plan	Due with Emissions Inventory	
Building 11 Engineering Scope of Work	December 31, 2019	Include a discussion of engineering testing locations, testing methods proposed, and testing deliverables.
Building 11 Engineering Testing	December 31, 2019	Complete testing by due date.
Buildings 8 and 11 Source Test Protocol	Contingent upon results of Building 11 Engineering Testing	Use Building 11 engineering testing results to inform testing locations and methods proposed in Building 11 Source Test Plan. Building 8 source testing is anticipated to be completed during Building 11 source testing event.
Buildings 8 and 11 Source Testing	To be determined in November 2019	Building 11 engineering testing is scheduled for November 18-20, 2019. Completion of this engineering testing will inform the scheduling of Buildings 8 and 11 source testing.
Emissions Inventory	May 30, 2020	Emissions inventory will be submitted with Buildings 8 and 11 source test report.
Monthly Conference Calls	Last week of the month, starting in November	Facility representative to summarize each conference call in a memo and submit to DEQ no later than 7 days after the conference call is held.

This approved extension timeline presumes Columbia Steel will communicate any questions or clarifications regarding the above comments proactively in order to provide timely and complete submittals. DEQ is available to coordinate with Columbia Steel to review any portion of this extension request as well as 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). We look forward to your continued assistance with this process.

Sincerely,



Kenzie Billings
DEQ CAO Project Manager

Cc: Marty Cox, Columbia Steel
Sarah Kronholm, SLR
Keith Johnson, DEQ
J.R. Giska, DEQ
Thomas Rhodes, DEQ
Steve Dietrich, DEQ
David Graiver, DEQ
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