

September 17, 2019

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VIA E-MAIL (KEITH.JOHNSON@STATE.OR.US)

Keith Johnson
Oregon Department of Environmental Quality
Cleaner Air Oregon
700 NE Multnomah Street, Suite 600
Portland, OR 97232

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

Dear Keith:

Columbia Steel Casting Co., Inc. (Columbia Steel) appreciated the opportunity to talk with you and your team regarding the issues Columbia Steel has in accomplishing its proposed source testing based on recent low order volume. This letter summarizes Columbia Steel's efforts related to Cleaner Air Oregon, our current issues, request for delay on timelines, and our plan to continue incremental progress.

As your team is aware, since being called in to Cleaner Air Oregon, Columbia Steel has made progress toward completing the required submittals. Columbia Steel has worked to develop and update the air toxics emission inventory, complete preliminary risk assessments, and submitted a source test protocol to develop site-specific emission factors for total particulate matter (PM) and select total metals such as arsenic, chromium, lead, manganese, nickel, and hexavalent chromium.

We had scheduled the source testing to commence on September 23, 2019. Testing has been hampered, however, due to a slow-down in orders and a current lack in diversity and predictability of scheduled pours. Due to the make-up of current orders, both volume and type of metals scheduled, Columbia Steel has significant concerns in its ability to accomplish the goals of the source testing. These changes in operating conditions, while serious, are expected to be temporary. However they do jeopardize our ability to obtain accurate or complete data. Columbia Steel requests an extension on implementing the source test protocol and submission of results, as well as the submittal of the updated emission inventory, modeling protocol, and risk assessment work plan until the volume and diversity of orders is such that appropriate and meaningful testing may be accomplished.

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As Columbia Steel works to increase the level of orders, Columbia Steel will continue to advance the objectives and requirements of Cleaner Air Oregon. Specifically, we propose conducting engineering testing to better understand sample run times in relation to sample volume, detection limits, and expected pollutant concentrations. This will be valuable to determine what conditions are necessary for the full source testing and for the risk assessment. This will ensure that the testing, once completed, will be performed in the most effective way (e.g., correct TEUs, correct pollutants, etc.). In addition, we will continue to work through the modeling protocol and Risk Assessment work plan, including analysis of guidance documents and follow up conversations with DEQ.

Keith, it is my understanding that DEQ is, in general, going to work with Columbia Steel due to the current but temporary operating conditions. We suggest a monthly communication protocol to ensure that the Agency is aware of Columbia Steel's operating level. If DEQ approves the extension, we suggest a monthly phone call to provide updates to DEQ. Please contact me with any questions.

Best regards,



Brien J. Flanagan

BF:cw

cc: M. Cox
S. Kronholm

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