



COLUMBIA STEEL CASTING CO., INC.

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July 17, 2019

Mr. JR Giska
CAO Program Engineer
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Re: Cleaner Air Oregon Extension Request

Dear Mr. Giska,

Columbia Steel Casting Co., Inc. (Columbia Steel) received written notification from the Oregon Department of Environmental Quality (DEQ) on March 4, 2019 that Columbia Steel was called in to the Cleaner Air Oregon (CAO) program. One of the requirements of CAO was to submit a CAO emission inventory form by June 2, 2019, as required by Oregon Administrative Rules (OAR) 340-245-0030(1)(a). On April 19, 2019 Columbia Steel notified DEQ that source testing will be completed in support of emissions data for Cleaner Air Oregon, and per OAR 340-245-0030(1)(a)(B) the updated emission inventory will be submitted within 150 days of the DEQ notice date, in this case, by August 1, 2019.

As allowed under OAR 340-245-0030(3), Columbia Steel is requesting an extension of time for the submittal of the updated emission inventory, modeling protocol, and risk assessment work plan. The proposed schedule is as follows:

- At least 30 days prior to beginning source testing (expected to be August 24, 2019) – Submittal of source test plan to DEQ
- September 23, 2019 through October 2, 2019 – Source testing to occur at Columbia Steel
- Within 60 days of completion of source testing (expected to be December 1, 2019) – Submittal of source test report to DEQ
- Within 60 days of submittal of the source test report (expected to be January 30, 2020) – Submittal of updated emission inventory, modeling protocol, and risk assessment work plan to DEQ

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Columbia Steel believes the delay is necessary for good cause and, as described below, has demonstrated progress with the source test planning.

- The source test planning took more than six weeks, including initial discussions with DEQ; scoping of emission units, pollutants, operating scenarios, and test methodologies; site visits from potential source test vendors; receipt of proposals for source testing; and review of the proposals. Site visits from vendors occurred on March 8, 2019 and April 10, 2019. Proposals for source testing were received on March 19, 2019 and April 19, 2019.
- Columbia Steel is in the process of renewing the Standard Air Contaminant Discharge Permit (ACDP). Potential new permit conditions include source testing requirements. On May 14, 2019, DEQ notified Columbia Steel of additional source testing requirements that will be included in the next ACDP. Columbia Steel then requested revised proposals to incorporate the additional testing requirements. Revised source testing proposals were received on May 24, 2019 and June 28, 2019.
- The proposed source testing is expected to be approximately two weeks in duration with source testing personnel coming from out of state for the project and requiring the rental of specific testing equipment from a third-party vendor. As such, the source testing cannot be completed during or immediately prior to a holiday, requires a two-week window from the source test company, and is contingent upon equipment availability. Additionally, Columbia Steel has a scheduled rolling maintenance outage from mid-July through mid-August. The first available window for testing is September 23, 2019 through October 2, 2019.
- The modeling protocol and risk assessment work plan cannot be completed until revised emission data is obtained through source testing and the emission inventory is updated.

If you have any questions, please contact Bruce Schacht at (503) 286-0685, x 286 or Sarah Kronholm from SLR International Corporation at (503) 709-7039.

Sincerely,

COLUMBIA STEEL CASTING CO., INC.



Bruce Schacht

Environmental Engineer

Cc: David Graiver, Oregon Department of Environmental Quality
Martha Cox, Columbia Steel Casting Co., Inc.
Dave Jubb, Columbia Steel Casting Co., Inc.
Dave Faust, Columbia Steel Casting Co., Inc.
Sarah Kronholm, SLR International Corporation
Brien Flanagan, Schwabe Williamson and Wyatt