



Oregon

Kate Brown, Governor

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October 27, 2021

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Ms. Kronholm,

DEQ received the submittal of supporting information on August 17, 2021 for the Cleaner Air Oregon (CAO) Emissions Inventory and dispersion modeling for the Columbia Steel Casting Company, Inc. (CSCC) facility in Portland, OR. DEQ also received the revised CAO Emissions Inventory and Level 3 Modeling Protocol and Risk Assessment Work Plan (Combined Protocol and Work Plan) on September 16, 2021 and has completed an initial review of these documents.

In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ has determined that the following additional information, corrections, and updates are required by **November 30, 2021** in order to approve the Emissions Inventory:

1. Safety Data Sheets:

- a. **Foseco Moldcote 34:** The Safety Data Sheets (SDSs) listed below include respirable crystalline silica, which is a reportable TAC. Revise the Emissions Inventory to include emissions estimates for *silica, crystalline (respirable)* (CAS No. 7631-86-9) in this material.
 - i. **SDS08** (Foseco Moldcote 34)
 - ii. **SDS09** (Foseco Isomol 780)
- b. **Freeman Master Kincote products:** The Safety Data Sheets (SDSs) listed below list reportable toxic air contaminants (TACs) in Section 3, Composition/Information on Ingredients, but do not provide chemical concentrations for reportable TACs listed. Please provide data supporting percent weight assumed for emissions estimates provided in the Emissions Inventory.
 - i. **SDS15** (Black)
 - ii. **SDS18** (Vermillion)
 - iii. **SDS19** (Yellow)
- c. **Valspar Luster LAC WW LAC Sand Seal:** Section 3 of SDS22 lists acetone (CAS No. 67-64-1) at 50-70% weight in the product. Include acetone emissions estimates for this product in the revised Emissions Inventory.
- d. **3M Platinum Plus Filler:** SDS29 includes respirable silica, which is a reportable TAC (CAS No. 7631-86-9). Revise the Emissions Inventory to include emissions estimates for *silica, crystalline (respirable)* in this material.
- e. **Welding materials:** SDSs for all welding materials include chromium content, and all but one SDS (SDS04, Randor Products) state that hexavalent chromium compounds may

be in the welding fume or base metals which contain chromium. However, no hexavalent chromium emissions estimates were included in the Emissions Inventory for welding activities. Revise the Emissions Inventory to include hexavalent chromium emissions from welding activities¹.

2. **Steel scrap material specifications:** Please provide the records required to be kept by Condition 8.5.b.ii of your Standard Air Contaminant Discharge Permit:

Condition 8.5.b.ii: Records of written materials specifications according to 3.2.b and records that demonstrate compliance with the requirements for restricted metallic scrap in 3.2.b.i and/or for the use of general scrap in 3.2.b.ii and for mercury in 3.2.c, as applicable. The permittee must keep records documenting compliance with 3.2.c.i for scrap that does not contain motor vehicle scrap.

3. **Baghouse 1 and Baghouse 2 emissions estimates:** During source testing completed in December 2020, total particulate matter (PM) emissions were measured for Baghouses 1 and 2 (BH1 and BH2). Revise the Emissions Inventory to apply the dust analyses for BH1 and BH2 to the Total PM emission factor determined during December 2020 source testing.
4. **Sand system fines analytical data:**
 - a. Attachment 2 of the information provided on August 17, 2021 included analytical data used as the basis for emissions estimates for several baghouses. The average weight percent of metals present in fresh, newer, and aged sand was applied to the PM emission factors for BH3, BH4, BH5, BH8, BH9, BH17, BH20, and BH22. Revise the Emissions Inventory to calculate TAC emissions for BH6 (Group 8 Sand System) using this same analytical data.
 - b. Attachment 3 of the information provided on August 17, 2021 included lab results for four different samples used as the basis for emissions estimates for several baghouses. DEQ's review of emissions estimates indicate that the PM emission factor for BH16 is ten times lower than what DEQ calculated using the information provided. Revise emissions estimates for BH16 as needed, or provide supporting information to explain this discrepancy.
5. **Storage Pile Emissions Estimates:**
 - a. Round storage pile height measurements to the nearest foot, or explain how measurements were obtained to the nearest hundredth of a foot.
 - b. Explain why an automotive shredder residue particle size distribution was used for the silt content percentage of storage piles, or use a more representative particle size distribution.
 - c. Revise note 2 to match material pile shape used.

DEQ is requesting that you submit additional information to complete your Emissions Inventory. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in OAR 340-214-0130 to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss the information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadline above may result in a violation of OAR 340-245-0030(1).

¹ https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Toxics_Program/APCD_welding1.pdf

If you have any questions regarding this letter please contact me directly at 503-866-8741 or kenzie.billings@state.or.us, and I look forward to your continued assistance with this process.

Sincerely,

Kenzie Billings
Air Toxics Project Manager

Cc: Martha Cox, CSCC
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