



December 12, 2022

Julia DeGagné
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Re: Response to DEQ request for information dated November 8, 2022

Dear Julia:

On behalf of Eagle Foundry Company (Eagle Foundry), Maul Foster & Alongi (MFA) is providing this response to your letter, dated November 8, 2022, in which the Department of Environmental Quality (DEQ) requests additional information as well as changes to Eagle Foundry's air toxics emissions inventory.

As you know, Eagle Foundry is a small business with limited experience with technical air quality regulatory matters. As such, Eagle Foundry retained MFA for help developing an approach that would limit the time and resources needed for the company to complete the Cleaner Air Oregon (CAO) process for its foundry in full cooperation with the DEQ. To that end, MFA advised Eagle Foundry to prepare and submit an emissions inventory based on the best information readily available to the company.

MFA was surprised and disappointed to receive the DEQ's November 8, 2022 response to Eagle Foundry's emission inventory, which consists of seven pages of very detailed requests for further information and many conservative assumptions to be incorporated into the inventory. Despite our experience advising sources preparing CAO emission inventories, MFA could not predict all of the questions the DEQ has asked or the assumptions that the DEQ included in its November 8, 2022 letter. Had we known what the DEQ's approach to Eagle Foundry's emissions inventory was going to be when called-in, we would have advised Eagle Foundry to complete the actions described in this letter (including source testing and engineering analyses) from the outset.

Regardless, Eagle Foundry remains focused on completing the CAO process as expeditiously as possible in partnership with the DEQ. However, given the scope of various items addressed in the DEQ's November 8, 2022 letter, Eagle Foundry must request an extension to the response deadline of December 28, 2022. Eagle Foundry's limited staff are working very hard with MFA's team to address the DEQ's questions about the inventory as quickly as they can. However, many of the DEQ's questions cannot be answered until the company collects new, site-specific information and MFA applies that information to update the emissions inventory. Similarly, we have advised Eagle Foundry to show the DEQ why it is not appropriate to incorporate several of the DEQ's suggested assumptions into the emissions inventory, and Eagle Foundry will need to collect additional site-specific data. Eagle Foundry has therefore directed MFA to develop a program for collecting, as soon as is reasonably possible, the site-specific information needed to update its emissions inventory in response to the DEQ. The

remainder of this letter explains what additional, site-specific data Eagle Foundry intends to collect, and the basis for the limited proposed extension of time in which to collect it.

This letter is being submitted pursuant to OAR 340-245-0030(3). In accordance with OAR 340-245-0030(3)(a), Eagle Foundry has made good progress responding to the DEQ's November 8, 2022 letter. Despite the intervening Thanksgiving holiday, MFA has already evaluated the DEQ's letter, met with Eagle Foundry and worked with Eagle Foundry to develop the proposed program and schedule for responding detailed herein. Moreover, Eagle Foundry has directed MFA to assist with responding to as many of the items from the DEQ's November 8, 2022 letter as it can as soon as possible.

MFA has determined that it would typically be possible for Eagle Foundry to respond to item 4 and items 7-14 from the DEQ's November 8, 2022 letter by the imposed deadline of December 28, 2022. However, during this holiday season, many facility personnel and MFA staff will be out of the office. For that reason, Eagle Foundry respectfully requests until January 11, 2023 to respond to item 4 and items 7-14 of the DEQ's November 8, 2022 letter, and to submit an updated emissions inventory to the DEQ that reflects Eagle Foundry's consideration of those items.

MFA has also determined that, to address items 1-3, 5 and 6 of the DEQ's November 8, 2022 letter, Eagle Foundry should complete further analyses to obtain new, site-specific data. Obtaining such data will come at significant immediate cost to Eagle Foundry. But MFA has advised Eagle Foundry that incurring that cost is preferable to applying assumptions that are not based on data from Eagle Foundry and which (MFA expects) will greatly over-estimate emissions and, in turn, the risk that will be assessed.

Accordingly, Eagle Foundry is now seeking, based on MFA's recommendation, a short delay during which new information will be collected for use in its response to items 1- 3, 5 and 6 of DEQ's November 8, 2022 letter. As required per OAR 340-245-0030(3)(b), there is good cause for this short delay. Specifically, allowing Eagle Foundry time to complete the source testing and other measures described in this letter to respond to these items in the DEQ's November 8, 2022 letter will ensure that the facility's emissions inventory reflects accurate, site-specific data instead of assumptions with the potential of being overly or insufficiently conservative.

To further clarify the need for additional time to respond to these items, below MFA has provided some initial responses to each item listed in the DEQ's November 8, 2022 letter. Each item is shown in bold below, with our responses following.

1. Baghouse dust composition analyses are not representative of the hexavalent chromium composition of emissions to air due to the potential for conversion between hexavalent and trivalent chromium. Update hexavalent chromium [CASRN 18540-29-9] emissions to use these more conservative assumptions: for the following Toxics Emissions Units (TEUs):

- a. MELT (steel production): assume total chromium emissions are composed of 12 percent hexavalent chromium;**
- b. MELT (iron production): assume total chromium emissions are composed of 3 percent hexavalent chromium; and**

c. POUR/COOL, REC, TORCH, GRIND, MESH, SHOT, S_PALMER, and SCREEN: assume total chromium emissions are composed of 3 percent hexavalent chromium.

Based on the analysis of the Eagle Foundry's baghouse dust, we are convinced that hexavalent chromium in the emissions from the toxic emission units (TEUs) listed above is at a much lower percentage of total chromium than the values that the DEQ has identified. Likewise, MFA does not have a scientific or technical justification as to why steel production would have a conversion rate that is four times higher than iron production. As much as Eagle Foundry would like to accept these assumptions for the sake of completing the CAO process quickly, MFA has advised that these decisions will significantly affect the emissions estimates included in Eagle Foundry's emissions inventory and could have correspondingly significant implications to assessed risk. No-one is well served by a risk assessment that is based on inaccurate information.

As a result, Eagle Foundry has decided to source test the MELT and POUR/COOL emissions for both its steel and iron operations. Eagle Foundry has already made significant progress on this task, including obtaining bids from multiple source test vendors and selecting one, Bison Engineering, Inc. At Eagle Foundry's request, MFA has been working with Bison to develop a comprehensive test program, which we expect will include hexavalent chromium as well as speciated metals and mercury. By measuring metals emissions directly, there will no longer be a need for particulate matter (PM) emission factors or to rely on assumptions taken from alloy contents. We also believe that the assumptions we develop from testing the baghouses that control MELT and POUR/COOL will inform conversion rates for the other processes the DEQ listed in 1(c).

Eagle Foundry is currently working on scheduling this testing. Bison has advised the testing program will require 3 to 4 days on-site, and that – given its existing commitments – Bison may need until March 2023 to complete the testing. In the meantime, Eagle Foundry plans to have a testing protocol prepared and submitted to the DEQ for approval by January 15, 2023 (subject to Bison's availability). Eagle Foundry is committed to responding to any comments on the protocol from the DEQ and, as possible, to finalizing the protocol within 15 days of the DEQ's response. Once the scope is agreed to, Eagle Foundry will direct Bison to complete the testing. Eagle Foundry can commit to completing the testing as soon as possible within 60 days of receiving the DEQ's approval of a source test plan (subject to Bison's availability). Toward that objective, Eagle Foundry will ask Bison to reserve a spot in its schedule for this testing early in the new year. As soon as a date is determined for this testing Eagle Foundry will notify the DEQ. Within 60 days following the testing, Eagle Foundry will require Bison's source test reports to be submitted to the DEQ. Thereafter, Eagle Foundry can commit to submitting a revised emission inventory to DEQ within 60 days after DEQ approves Bison's source test report.

In making this request to allow Eagle Foundry to complete source testing on the schedule set forth above, MFA asks that the DEQ treat Eagle Foundry no differently than it has various other, higher priority existing sources called into the CAO program. Just as was true for those

other sources, allowing Eagle Foundry limited additional time in which to complete source testing will ensure that the final emissions inventory is as accurate as possible.

2. Metal melting activities (MELT TEU):

a. Particulate matter (PM) emissions were reported for this TEU using AP-42 (EPA's Compilation of Air Pollutant Emission Factors), Chapter 12.10, Table 12.10-3, "Particulate Emission Factors for Iron Furnaces"; however, more recent data indicates potentially higher PM emissions from metal melting in induction furnaces². Revise these emissions estimates as follows:

i. Use an uncontrolled emission factor of 2.06 pounds PM per ton metal melted (2 pounds per ton filterable PM and 0.06 pounds per ton condensable PM); and

ii. Use an applicable default control efficiency for controlled condensable PM emissions, based on Table 3-4 of Research Triangle Institute (RTI) International's "Emission Estimation Protocol for Iron and Steel Foundries" report.

b. Site-specific metal chemistry data is considered to be more representative of the overall TAC profile of filterable PM emissions than baghouse dust – update the TAC composition of the filterable PM to match the TAC composition of the melted alloys, on a daily maximum basis (for acute emission estimates) and annual average basis (for chronic emission estimates); and

c. Neither baghouse dust nor site-specific metal chemistry data is appropriate for the determination of condensable PM composition; the TAC profile of condensable PM may be determined by assuming the default composition presented in Table 3-6 of RTI International's "Emission Estimation Protocol for Iron and Steel Foundries" report.

MFA disagrees that applying the proposed PM emission factors, control efficiency or alloy compositions would provide accurate data. As to the latter, metals have varying melting and boiling points, like any other substance. The boiling point of selenium, for example, is 700°C, whereas manganese does not boil until 2,060°C. The boiling point of chromium is higher yet, at 2,670°C. It is therefore not apparent that the concentration of metal emissions would be in proportion to their composition in the alloys if they have wildly different temperatures at which they volatilize. MFA believes source testing (detailed in response to item 1, above) will demonstrate this. As indicated, completing the planned source testing should also eliminate the need for PM emission factors and application of alloy concentrations. As the DEQ is aware, the RTI International report cited by the DEQ sets forth a system for ranking emission estimation methodologies in which site-specific, source test emissions data is always favored over default emission factors. MFA is therefore requesting that the DEQ work with Eagle Foundry on its program for source testing at the foundry.

3. Pouring and cooling activities (POUR_COOL TEU): site-specific metal chemistry data may be more representative of the overall TAC composition of filterable PM emissions than baghouse dust, depending on the temperature, process step, and averaging time of the emissions estimate. For conservatism, update the TAC composition to match the higher of either:

a. The baghouse dust composition; or

b. The TAC composition of the melted alloys, on a daily maximum basis and annual average basis.

Emissions from this TEU will be addressed with site specific source testing as described above.

4. Hot Top usage (HOTTOP TEU): because the aluminum oxide emitted is anticipated to be non-fibrous (based on information reported in the Safety Data Sheet (SDS)), report emissions for aluminum oxide as “aluminum and compounds” [CASRN 7429-90-5] rather than aluminum oxide (fibrous forms) [CASRN 1344-28-1].

Eagle Foundry has no objections to making this change and will update emissions inventory accordingly by January 11, 2023.

5. Torch cutting activities (TORCH TEU):

a. DEQ observed a significant amount of visible torch cutting emissions not being captured by controls during a site visit on July 8, 2022. Please update the baghouse capture efficiency for the TORCH TEU to zero percent.

b. The AP-42 emission factor for PM emissions from this activity used in the Inventory is based on emissions from billet cutting in units of pounds per ton of steel produced, which may not be representative of Eagle Foundry’s torch cutting process. Update the PM emission factor to 0.06 pounds total PM per hour cutting time per station, as reported in emissions data from the American Welding Society for torch cutting of clean, ½-inch steel plate.

For clarity at the facility, MFA wishes to change the name of this TEU to AIRARC_TEU. This change will make this TEU more recognizable to operators when the Eagle Foundry permit is finally issued. MFA will update the emissions inventory accordingly.

This important source of emissions must be accurately reflected in Eagle Foundry’s emissions inventory, and Eagle Foundry is dedicated to capturing and controlling emissions from its AIRARC cutting activities. On smaller parts, MFA believes that Eagle Foundry’s capture and control methods are quite effective. On the day that the DEQ visited, however, a large part was being cleaned and was situated away from the dedicated suction device for process emissions. As a result, what the DEQ observed was not typical of Eagle Foundry’s operation of this process and cannot be fairly used as the measure of the capture of emissions from the entire process at all times. Regardless, Eagle Foundry does not want to debate with the DEQ about whether its previously proposed process capture efficiency is better than the DEQ’s assumed capture efficiency of 0%. Instead, Eagle Foundry is committed to better evaluating (and immediately improving to achieve 100% capture, if needed) its capture of emissions from this source. To that end, Eagle Foundry has already met with engineers from Evergreen Engineering who are preparing a proposal to better assess capture of emissions from this process, and to verify (and, if necessary, test) the capture assumptions included in the emissions inventory. At MFA’s recommendation, Eagle Foundry has also asked Evergreen Engineering for information about whether changes could be made to the torch cut process to ensure the foundry captures 100% of the cutting emissions, regardless of part size or hood

use. On Eagle Foundry's behalf, MFA requests until March 31, 2023 to update the emissions inventory in response to this item, during which time Eagle Foundry and MFA will work with Evergreen Engineering to verify and support (including through testing) any emission factors and/or capture assumptions that are incorporated into the updated inventory.

6. Grinding activities (GRIND TEU):

- a. Update the PM emission factor to 0.16 pounds per ton metal produced to reflect the median emission factor for grinding, developed from data collected in the EPA's 1998 Foundry Information Collection Request.**
- b. Due to the sharing of the baghouse between the grinding and rotoblast processes and the potential for daily variation in production, site-specific metal chemistry data may be more representative of the overall TAC composition of PM emissions than baghouse dust. For conservatism, update the TAC composition to match the higher of either:
 - i. The baghouse dust composition; or**
 - ii. The TAC composition of the melted alloys, on a daily maximum basis and annual average basis.****

Similar to the AIRARC operations, Eagle Foundry is operated to ensure the best capture efficiency possible for GRIND. And, on Eagle Foundry's behalf, MFA wants to ensure that Eagle Foundry's efforts toward that end are accurately incorporated into the emissions inventory. Instead of directing MFA to further debate these points with the DEQ, Eagle Foundry has instead instructed MFA to work with Evergreen Engineering to evaluate (and immediately improve, if needed, its capture of emissions from this source). That evaluation will include assessing the enclosure of the grinding operations, to effectively eliminate fugitive emissions. MFA requests until March 31, 2023 to update the emissions inventory in response to this item, during which time Eagle Foundry and MFA will work with Evergreen Engineering to verify and support (including through testing) any emission factors and/or capture assumptions incorporated into the updated inventory. MFA believes this will provide better clarity on emission rate and location of emissions from this source.

7. Welding activities (WELD TEU):

- a. Include emissions for molybdenum (reported as molybdenum trioxide [CASRN 1313-27-5]) for consistency with the SDS information provided in Attachment C of the Inventory submittal for the following welding materials:
 - i. Prostar 6S Wire;**
 - ii. Stooddy Wire; and**
 - iii. Avesta 2205.****
- b. Confirm that all welding processes used are Tungsten Inert or Gas Metal Arc Welding (TIG or GMAW, respectively), or update emission factors to reflect alternative welding processes (e.g., Flux Core Arc Welding, or FCAW).⁸**
- c. Update the annual throughput, emission factors, and emissions reported in the AQ520 to be consistent with one another (i.e., emissions should equal the throughput multiplied by the emission factor).**

Eagle Foundry has confirmed that all welding is GMAW (wire feed) or SMAW (stick feed). Eagle Foundry will make the necessary updates to its emissions inventory and AQ520 to reflect this by January 11, 2023.

8. Abrasive blasting activities:

- a. Provide a detailed description of mesh (MESH TEU) and steel shot (SHOT TEU) abrasive blasting processes, including blasting equipment used (e.g. manufacturer make/model, type of housing and whether fully enclosed, control device type and specifications) and abrasive materials used (including type, whether materials are recycled, and how material usage is tracked).**
- b. Update the process flow diagram (Attachment D of the Inventory submittal) for mesh abrasive blasting (MESH TEU) to illustrate emissions to atmosphere from this process, any applicable control devices, and type of emissions (stack or fugitive).**

Eagle Foundry is collecting this information and will make the necessary updates to the process flow diagram by January 11, 2023.

9. Based on the SDSs provided in Attachment C to the Inventory, raw materials containing respirable crystalline silica are used in the HOTTOP and MOLD TEUs. All forms of respirable crystalline silica are TACs and must be reported. CASRN 14808-60-7 and CASRN 14464-46-1 identify specific forms of crystalline silica (quartz and cristobalite), which fall under the general silica category (CASRN 7631-86-9). If TACs are not likely to be emitted, justification must be provided for exemption per OAR 340-245-0060(3)(a). Update the Inventory to include emissions from handling of the following, reported under the general CASRN 7631-86-9 (“Silica, crystalline (respirable)”):

- a. HOTTOP: the Vesuvius Ferrux® 746 hot top product (contains between 1 and 5 percent crystalline silica (Quartz) [CASRN 14808-60-7]); and**
- b. MOLD:**
 - i. Vesuvius Isomol® 780 (contains between 0.1 and 1 percent crystalline silica (Quartz) [CASRN 14808-60-7]); and**
 - ii. Velvacoat™ ST 803 (contains between 0.1 and 1 percent quartz/sand [CASRN 14808-60-7]) and between 0.1 and 1 percent cristobalite [CASRN 14464-46-1].**

Eagle Foundry is evaluating whether this is a source of respirable crystalline silica and how best to quantify it. Eagle Foundry will update the emission inventory by January 11, 2023 for this source.

10. Pattern making activities (PATTERN TEU): Include emissions of trimethylbenzene [CASRN 25551-13-7] from use of Polyurethane Clear Varnish, for consistency with the SDS information provided in Attachment C of the Inventory submittal. CASRN 25551-13-7 indicates a mixture of the trimethylbenzene isomers 1,2,3-trimethylbenzene [CASRN 526-73-8], 1,2,4-trimethylbenzene [CASRN 95-63-6] and 1,3,5-trimethylbenzene [CASRN 108-67-8], all of which are listed TACs. Please report emissions as one of the isomers (e.g., assume all emissions are 1,2,3-trimethylbenzene [CASRN 526-73-8]).

Eagle Foundry will make this update as requested by January 11, 2023.

11. Propane combustion activities (PROPANE TEU): Update the process flow diagram (Attachment D of the Inventory submittal) to illustrate emissions to atmosphere from this process and indicate stack or fugitive emissions.

Eagle Foundry will update the process flow diagram as requested by January 11, 2023.

12. Emergency diesel engine combustion activities (EGEN TEU):
a. Update assumed load factor to 100 percent; and
b. For hourly actual throughput and for annual and hourly potential to emit throughputs, report fuel usage rates based on manufacturer's specifications, rather than a calculated average (please provide documentation of reported fuel usage rates).

Eagle Foundry will make this update as requested by January 11, 2023.

13. Update the AQ520 form as follows:
a. Include additional line items for TEUs with multiple emission points.¹⁰ For these TEUs, designate a separate TEU ID for each stack and fugitive emission point (on Tab 2), and list individual activity information (on Tab 2), emission factor information, control efficiency, and calculated emissions (on Tab 3) for each emission point. This is necessary to ensure correspondence of emission rates between the Inventory and the Modeling Protocol. Updated TEUs should include, but may not be limited to:
i. MELT;
ii. POUR_COOL;
iii. HOTTOP;
iv. REC;
v. WELD;
vi. SCREENING; and
vii. GRIND;

Eagle Foundry will address this issue by January 11, 2023.

b. Update activity units in column F of Tab 2 to be a single unit (for example, pounds or tons, but not both), and to be consistent with both daily and annual activities and the reported emission factor units for the following TEUs:
i. MELT;
ii. POUR_COOL;
iii. REC;
iv. TORCH;
v. GRIND;
vi. MESH;
vii. S_PALMER;
viii. SCREENING;
ix. PROPANE; and
x. EGEN;

Eagle Foundry will make this update as requested by January 11, 2023.

c. Update annual and daily throughput for the S_PALMER TEU on Tab 2 to reflect “PM generated” rather than “PM collected”, for consistency with the emission factor and emissions reported in Tab 3.

Eagle Foundry will make this update as requested by January 11, 2023.

d. Update the “Reference/Notes” column in Tab 3 to fully specify the source of the emission factor for each TEU and TAC (for example, “PM emission factor from AP-42, Chapter 12.10, Table 12.10-7 “Particulate Emission Factors for Ancillary Operations and Fugitive Sources at Gray Iron Foundries” – uncontrolled particulate emission factor for pouring and cooling in an electric induction furnace; TAC emissions estimated from baghouse dust analysis.”); and

Eagle Foundry will make this update as requested by January 11, 2023.

e. Correct daily and annual emission factors in Tab 3 for TORCH TEU, which appear to have been transposed for manganese [CASRN 7439-96-5], nickel [CASRN 7440-02-0], and phosphorus [DEQ SEQ ID 504].

Eagle Foundry will make this update as requested by January 11, 2023.

14. Provide the following additional documentation and background information to support the Inventory [OAR 340-245-0040(b)(C)]:

- a. Documentation related to baghouse and other dust collection data for both 2020 and 2021 dust-collection periods for each sample (including but not limited to: “Foundry”, “Reclaim”, “Small Palmer”, “Finishing”, “Mesh Blast”, and “Screening”), including:**
- i. Mass measurements and laboratory analytical reports;**
 - ii. Corresponding TEU throughput; and**
 - iii. Breakdown of TEU throughput by metal alloy during the collection period.**

Eagle Foundry will provide this information as requested by January 11, 2023. However, the foundry baghouse dust information will no longer be needed as there will be source-specific emission testing results to use for all future emissions estimates.

b. Documentation supporting the reported capture efficiency for the following control devices/TEUs:

- i. TEU MELT and TEU POUR_COOL (permitted Device IDs “Roof peak” and “Bunkers”);**
- ii. TEU S_PALMER (permitted Device ID “Palmer”); and**
- iii. TEU REC (permitted Device ID “Rotary”).**

Eagle Foundry already has consultants reviewing these systems. Eagle Foundry will provide this information as requested by January 11, 2023.

c. Manufacturer specifications or other documentation of control efficiencies for the following control devices:

- i. Foundry baghouses (permitted Device IDs “Roof peak” and “Bunkers”);**
- ii. Reclaim baghouse (permitted Device ID “Rotary”);**
- iii. Finishing baghouse (permitted Device ID “Finish”); and**
- iv. Small Palmer baghouse (permitted Device ID “Palmer”).**

Eagle Foundry will provide this information by January 11, 2023.

d. SCREENING TEU: review the narrative description of the PM emission factor (see Attachment B), which includes silos and sand handling activities, and:

- i. Document any changes needed to equipment, air flows, operating hours, throughputs, controls, or emission factors based on current operations;**
- ii. Update the PM emission factor or emission factors used in the Inventory if necessary; and**
- iii. Update TEU IDs and emission points reported in the PFD, AQ520, and supporting calculations to attribute emissions to specific emission points.**

Eagle Foundry will make these updates as requested by January 11, 2023.

e. SDSs for all raw materials used that have not been provided in Attachment C of the Inventory, including but not limited to:

- i. Abrasive material used in the mesh blast process (MESH TEU); and**
- ii. Abrasive material used in the shot blast process (SHOT TEU); and**

Eagle Foundry will provide this information as requested.

f. Technical basis for the assumption that 1 percent of the Vesuvius Ferrux® 746 hot top product becomes airborne (HOTTOP TEU).

Eagle Foundry is reviewing this assumption and will provide this information as requested by January 11, 2023.

* * *

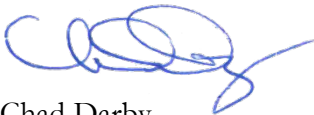
As you can see, Eagle Foundry has been busy working to address your November 8, 2022 information request. Eagle Foundry has already engaged source testers, an outside engineering company, and those of us at MFA for assistance. As previously stated, Eagle Foundry is a small company with limited staff, and much of the data that the DEQ has requested will require collaboration by the facility’s staff with experts outside the company, which is challenged by scheduling conflicts that have arisen due to the holidays. For these reasons, preparing a complete response to the DEQ’s November 8, 2022 letter is more than the company can accomplish by December 28, 2022.

Eagle Foundry can, however, commit to responding to requested items 4 and 7-14 by January 11, 2023. In addition, on Eagle Foundry’s behalf, MFA is requesting an extension (as detailed here) to address items 1-3, 5 and 6 from the DEQ’s November 8, 2002 letter, as the response to these items will require source testing and engineering. Eagle Foundry is committed to

completing the CAO process as soon as is reasonably possible, and it does not make this extension request lightly. However, on our advice and recommendation, Eagle Foundry is seeking limited additional time in which to generate, analyze and incorporate site-specific information into its updated emissions inventory.

Without trying to be critical, Eagle Foundry would not be in the position of having to seek an extension request if the DEQ had indicated upfront that Eagle Foundry would, absent new, site-specific information, be asked to use a set of conservative, default emission factors and assumptions selected by the DEQ. MFA is concerned that using those conservative defaults could cause Eagle Foundry to show exaggerated risk in its assessment that is not representative of facility operations. To date, Eagle Foundry has made clear to the DEQ that completing the source testing and engineering analyses proposed in this letter will present a material expense that the company would have preferred to avoid. And Eagle Foundry appreciates the DEQ's willingness to this point to allow it to work with MFA to develop an inventory that did not require immediate analyses of this kind. But, now that the DEQ will otherwise expect use of conservative, default emission factors and assumptions, Eagle Foundry believes it has little choice but to seek the limited extension of time in which to develop more accurate information for response to items 1-3, 5 and 6. MFA believes that collecting this information is in the collective best interest of Eagle Foundry, the DEQ and the public. We sincerely appreciate your consideration of this request.

Sincerely,



Chad Darby

cc: Jack Scott, Eagle Foundry