



# Oregon

Kate Brown, Governor

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December 21, 2022

Chad Darby  
Maul Foster & Alongi  
6 Centerpointe Drive, Suite 360  
Lake Oswego, OR 97035  
*Sent via email only*

Re: Extension Request for Submittal of Revised Cleaner Air Oregon Emission Inventory – Eagle Foundry

Chad Darby,

Eagle Foundry Company (Eagle) was called into the Cleaner Air Oregon (CAO) program on February 1, 2022, with an initial Emissions Inventory (Inventory) submittal deadline of May 2, 2022. On April 15, 2022, Eagle requested a 45-day extension of this deadline. DEQ granted a 14-day extension, for the Inventory to be submitted by May 16, 2022. Eagle submitted the Inventory on May 16, 2022. After review, DEQ issued a written request on November 8, 2022 (Information Request), requiring additional information and a revised Inventory to be submitted on December 28, 2022. On December 12, 2022, DEQ received a request from Maul Foster & Alongi (MFA), on behalf of Eagle, for an extension of the deadline for submittal of the additional information and revised Inventory. Eagle is requesting additional time for the following activities:

- 1.) To work with consultants to gather facility information and make updates to the Inventory in fulfillment of Information Request Items 4 and 7-14, related to general facility operations and several individual Toxic Emission Units (TEUs) (14-day extension requested, until January 11, 2023);
- 2.) To work with consultants and contractors to complete engineering analyses to inform responses to Information Request Items 5 and 6, related to the TORCH (proposed revised designation as AIRARC) and GRIND TEUs (93-day extension requested, until March 31, 2023); and
- 3.) To work with consultants and contractors to complete stack testing to gather data to inform emissions estimates for the MELT and POUR/COOL TEUs (proposed timeline: source test plan to be submitted by January 15, 2023; source testing to be completed no later than 60 days after DEQ approval of the test plan; test report to be submitted no later than 60 days after source testing; and revised Inventory to be submitted no later than 60 days after DEQ approval of the source test report).

DEQ understands that additional time may be required to work with consultants to gather the detailed information requested in Information Request Items 4 and 7-14, and that a longer period of time may be needed to substantiate emissions (including capture efficiency) from TEUs TORCH (now known as AIRARC) and GRIND, through engineering testing. DEQ further understands that Eagle does not have site-specific stack test data for either particulate matter or Toxic Air Contaminants (TACs) for the MELT or POUR/COOL TEUs, and that gathering additional data to characterize emissions of risk-driving TACs for this facility is likely to have a substantive impact on the Inventory and subsequent risk assessment. Eagle has demonstrated progress toward gathering site-specific data by working with MFA and Evergreen

Engineering on proposals to assess emissions and by selecting a vendor to perform source testing, and has proposed specific TEUs and TACs for testing. MFA has also provided a reasonable and specific timeline for testing. For these reasons, DEQ approves the following amendments to the November 8 Information Request:

- Information Request Items 4 and 7-14: the required submittal date for responses to these items is extended to **January 11, 2023**;
- Information Request Items 5 and 6: the required submittal date for responses to these items is extended to **March 31, 2023**; however, Eagle must submit to DEQ for approval any analyses or testing used to determine emissions for these TEUs in order to incorporate the new information gained from this site-specific engineering testing into the Inventory – consistent with section 2.3 of the [DEQ Source Sampling Manual](#). Eagle must provide a source test plan to DEQ at least 30 days before conducting any source testing (including capture efficiency verification testing);
- Information Request Items 1a, 1b, 2, and 3: rather than extending the submittal date for these items, DEQ amends the November 8, 2022, Information Request to remove Items 1a, 1b, 2, and 3, based on the lack of site-specific testing data for TAC emissions from the MELT and POUR/COOL TEUs, the uncertainty in using publicly available emissions factors, and Eagle’s proposal to perform source testing – DEQ instead requests the information listed in Items 1 and 2 below; and
- Information Request Item 1c:
  - DEQ amends the November 8, 2022, Information Request to remove the portion of this item relating to the POUR/COOL TEUs, and instead requests the information listed in Items 1 and 2 below;
  - DEQ extends the required submittal date for the portion of this item relating to the REC, TORCH, GRIND, MESH, SHOT, S\_PALMER, and SCREEN TEUs to **January 11, 2023** – DEQ will evaluate MFA’s proposal to use information developed from the planned testing of the MELT and POUR/COOL TEUs to inform hexavalent chromium conversion rates for other processes when that data becomes available.

In accordance with Oregon Administrative Rule ([OAR](#) 340-245-0030(2)), DEQ has determined that the following additional information, corrections, and updates are required in order to approve the Inventory:

1. Perform source testing of the MELT and POUR/COOL TEUs, according to the following schedule and specifications:
  - a. Submit a source test plan to DEQ by **January 15, 2023**, addressing the following:
    - i. Sampling for metal TACs using EPA Method 29, or similar method upon DEQ approval, for the following:
      1. Aluminum (CASRN 7429-90-5)<sup>1</sup>;
      2. Antimony (CASRN 7440-36-0);
      3. Arsenic (CASRN 7440-38-2);
      4. Barium (CASRN 7440-39-3);
      5. Beryllium (CASRN 7440-41-7);
      6. Cadmium (CASRN 7440-43-9);
      7. Chromium (CASRN 7440-47-3);
      8. Cobalt (CASRN 7440-48-4);
      9. Copper (CASRN 7440-50-8);
      10. Lead (CASRN 7439-92-1);
      11. Manganese (CASRN 7439-96-5);

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<sup>1</sup> Aluminum is not a listed analyte for Method 29, but it can be reported using this method and is a listed TAC.

12. Mercury (CASRN 7439-97-6);
  13. Nickel (CASRN 7440-02-0);
  14. Phosphorus (DEQ SEQ ID 504);
  15. Selenium (CASRN 7782-49-2);
  16. Silver (CASRN 7440-22-4);
  17. Thallium (CASRN 7440-28-0);
  18. Vanadium (CASRN 7440-62-2); and
  19. Zinc (CASRN 7440-66-6).
- ii. Sampling for hexavalent chromium (CASRN 18540-29-9) using EPA SW-846 Method 0061;
  - iii. Please review sections 2.7 and 2.8 of the [DEQ Source Sampling Manual](#) when proposing minimum sample volumes for each test method. Please consult with DEQ prior to submittal of the test plan if you have any concerns regarding sample volumes and/or analytical detection limits; and
  - iv. Include a proposed methodology for estimating fugitive emissions from the MELT and POUR/COOL TEUs, including determination of capture efficiency and composition of emissions;
- b. Complete source testing no later than **60 days after DEQ approval of the test plan**; and
  - c. Submit source test results, including the information required in Appendix A of the Source Sampling Manual, to DEQ no later than **60 days after the completion of source testing**; and
2. Submit a revised Inventory, including updated emissions for the MELT and POUR/COOL TEUs based on source test results, no later than **30 days after DEQ approval of the source test report**.

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 deadlines above may result in a violation of [OAR 340-245-0030\(1\)](#).

Please contact me directly at 503.866.9643, [julia.degagne@deq.oregon.gov](mailto:julia.degagne@deq.oregon.gov), if you have any questions regarding this extension or the Inventory submittal requirements.

Sincerely,



Julia DeGagné  
Air Toxics Project Manager

Cc: Jack Scott, Eagle Foundry Company  
Yuki Puram, DEQ  
J.R. Giska, DEQ  
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