



June 16, 2023

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

Re: Main Foundry and Cooling Bunker Baghouse Emission Factor Determination and Main Foundry PTE Verification Test Report, Eagle Foundry Co.

Dear Julia:

On behalf of Eagle Foundry Company (Eagle Foundry), please find attached the Main Foundry and Cooling Bunker Baghouse Emission Factor Verification and Main Foundry PTE Verification test report. Emission testing was conducted at the Eagle Foundry facility by Bison Engineering on March 27-29, 2023, on both foundry baghouses to determine emission factors of metals from melting, pouring, and cooling activities in the foundry. At the same time, a US EPA Method 204 verification test was conducted on the foundry building to confirm it meets the requirements of a permanent total enclosure.

The attached report from Bison Engineering confirms that the main foundry building qualifies as a permanent total enclosure. With Department of Environmental (DEQ) concurrence it will be assumed that 100 percent of the emissions from melting, pouring, and cooling activities in the building were directed to one of the two foundry baghouses where they were quantified during testing. All building improvements remain in place so it will also be assumed that there are no fugitive emissions from the building for the purposes of subsequent Cleaner Air Oregon analyses.

The results of the testing have confirmed that a number of metals were not detectable. The following metals were not detected at either baghouse in any test runs of the inlet or outlet (12 measurements for each metal type):

White Iron	Steel
Arsenic	Arsenic
Beryllium	Beryllium
Mercury	Mercury
Phosphorus	Selenium
Selenium	Silver
Thallium	Thallium
Vanadium	Vanadium

If the DEQ concurs with the source test results, it is assumed that the emission rates of these metals will be zero, per Appendix G of The Recommended Procedures for Toxic Air Contaminant Health Risk Assessments, for the purposes of the Cleaner Air Oregon emissions inventory.

If you have any questions, please don't hesitate to call me at (503) 523-7142 or reach out to Jack Scott (Eagle Foundry) at (503) 637-3048.

Sincerely,



Chad Darby

cc: Thomas Rhodes, DEQ  
Jack Scott, Eagle Foundry