



Oregon

Tina Kotek, Governor

Department of Environmental Quality
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January 24, 2023

Jacob Rankin
Bison Engineering, Inc,
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Sent via email only

Jacob Rankin,

The Oregon Department of Environmental Quality (DEQ) has reviewed the source test plan submitted by Bison Engineering on behalf of Eagle Foundry on January 13, 2023, for providing site specific emissions data from source testing. Based on our review, DEQ requires that the following issues be addressed in a revised source test plan, and that the revised source test plan is due by **February 7, 2023**.

Specific Comments

1. DEQ does not approve the use of CARB Method 425 for hexavalent chromium testing for this source. Revise the test plan to use EPA SW-846 Test Method 0061 for hexavalent chromium testing. DEQ will allow the use of sodium bicarbonate impinger solution as a method deviation.
2. Revise the test plan to include proposed minimum sample volumes for EPA Method 29 and for EPA SW-846 Test Method 0061.
3. Revise the test plan to include estimated In-Stack Detection Limits (ISDLs) for all EPA Method 29 and EPA SW-846 Test Method 0061 analytes.
4. Revise the test plan to include proposed minimum production amounts for white iron and manganese steel during the source testing. Production rates for the source test should reflect max capacity used in the CAO risk assessment.

If you have any questions or concerns, please contact me directly at 503-869-0054 or thomas.rhodes@deq.oregon.gov.

Sincerely,

Thomas Rhodes

Thomas Rhodes
DEQ CAO Source Test Coordinator

CC (via email):

Jack Scott, Eagle Foundry Company
Chad Darby, Maul Foster & Alongi
J.R. Giska, DEQ
Julia DeGagné, DEQ
Yuki Puram, DEQ
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