



# EAGLE FOUNDRY COMPANY

April 14, 2022

Julia DeGagné  
Air Toxics Project Manager  
Oregon Department of Environmental Quality  
700 NE Multnomah St., Ste 600  
Portland, OR 97232

RE: Extension Request for Submittal of CAO Emissions Inventory- Eagle Foundry

Dear Julia:

Eagle Foundry Company received written notice from the Oregon Department of Environmental Quality (DEQ) on February 1, 2022 that the facility located at 23123 SE Eagle Creek Rd., Eagle Creek, Oregon was being called into the Cleaner Air Oregon (CAO) program. Accordingly, the CAO emissions inventory is presently due by May 2, 2022. With this letter, Eagle Foundry is requesting an extension to the emissions inventory submissions deadline, in accordance with OAR 340-245-0030(3).

Eagle Foundry has been working with Maul Foster & Alongi, Inc. (MFA) to prepare the emissions inventory and has made significant progress characterizing air toxics emission from sources at the facility that we know are subject to the program. Although we are committed to making progress, as you know from speaking with our legal counsel, Mr. Geoffrey Tichenor, our operation has been suffering from serious economic hardships and distractions caused by the labor shortage, inflationary pressures and supply chain disruptions due to the pandemic and ongoing conflict in Ukraine.


On March 31, 2022, we received your request to incorporate into our emissions inventory submittal DEQ's new guidance regarding emissions sources that were previously considered categorically exempt under the CAO program.

Eagle Foundry is working diligently to gather the additional information that will be needed for sources that are no longer considered categorically exempt, such as our maintenance shop. But we will need additional time to work with MFA to understand how the new guidance applies to our operations, i.e., to identify products and activities, determine the toxic air contaminants, and estimate their emission rates before comparing them to the new thresholds of significance.

We understand from our advisors that existing sources that had already submitted their CAO emissions inventories were given 45 days to submit this additional information. We are similarly requesting a 45- day extension of our CAO emissions inventory deadline, to June 16, 2022. The extension will allow us to cost-effectively work with MFA to incorporate information related to sources previously considered categorically exempt into our CAO emissions inventory. MFA expects that work will have a substantive impact on the emissions inventory submittal.

We appreciate DEQ's sensitivity to our circumstances. And we kindly request that you confirm this extension as soon as possible so that we may plan appropriately. Separately, we ask that the plant tour be scheduled once DEQ acts on this extension request.

Sincerely,

  
Jack Scott  
General Manager/Environmental Contact