



Oregon

Kate Brown, Governor

Department of Environmental Quality
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December 22, 2022

Wolf Steel Foundry, Inc.
6160 S. Whiskey Hill Rd.
Hubbard, OR 97032
Sent via email only

Bryan Rumpca,

Wolf Steel Foundry, Inc (Wolf) submitted an initial Emissions Inventory (Inventory) on May 2, 2022. After review, DEQ issued a written Information Request on December 2, 2022, requiring additional information and a revised Inventory to be submitted on January 16, 2023. On December 20, 2022, DEQ received a request from Bridgewater Group Inc, on behalf of Wolf, for an extension of the deadline for submitting additional information and a revised Inventory.

DEQ has reviewed the extension request is not able to approve the extension at this time, for the following reasons:

1. The items in the Information Request can be categorized as follows: provide background information and documentation not included with the original submittal; clarify and/or substantiate the methodologies and assumptions used to estimate emissions; revise emissions estimates based on alternative, publicly available data sources. The first two categories are items that were required with the initial submittal under [OAR 340-240-0040\(4\)\(b\)\(C\)](#), and should be readily available considering they were used for developing the Inventory.
2. In regard to item 3 from the Information Request, DEQ erred in the original reference to source testing data – the 12% ratio of hexavalent chromium to total chromium for stainless steel melts comes directly from the RTI International, Emission Estimation Protocol for Iron and Steel Foundries (December, 2012), Table B-9 (<https://www.rti.org/publication/emission-estimation-protocol-iron-and-steel-foundries/fulltext.pdf>). Because of this, no source test review or analysis is required.
3. DEQ considers the criteria in [OAR 340-245-0030\(3\)](#) when determining the whether to grant an extension under CAO:
 - a. The owner or operator has demonstrated good progress in completing the submittal: At this time, Wolf has not provided any information or demonstration of progress in completing this request, nor has Wolf collaborated with DEQ in addressing any of the items in the Information Request; and
 - b. A delay is necessary for good cause shown by the owner or operator: As noted above, the majority of the requested items were used to develop the Inventory and should be readily available. Additionally, the correction noted in #2 above indicates no further analysis of source testing data is required, as was stated as a primary basis for the extension request.

Submittal of the additional information and revised Inventory remain due on January 16, 2023. Since this date falls on a state holiday, the effective deadline is the next working day, **January 17, 2023**.

DEQ remains available to discuss the information request with you and answer any questions you may

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have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of [OAR 340-245-0040\(1\)&\(4\)](#) and could result in enforcement under [OAR 340-245-0030\(4\)](#).

If you have any questions regarding this letter, please contact Marissa Meyer directly at (971-269-8163, Marissa.Meyer@deq.oregon.gov), and we look forward to your continued assistance with this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'J.R. Giska', with a stylized flourish at the end.

J.R. Giska
Cleaner Air Oregon Program Engineer

Cc: Travis Quarles, Bridgewater Group, Inc.
Kent Norville, Bridgewater Group, Inc.
Nate Barta, Wolf Steel Foundry, Inc.
Marissa Meyer, DEQ
Louis Bivins, DEQ
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