



# Oregon

Kate Brown, Governor

Department of Environmental Quality  
Agency Headquarters  
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January 20, 2021

Sarah D. Kronholm, P.E.  
SLR International Corporation  
1800 Blankenship Road, Suite 440  
West Linn, OR 97068

Re: Cleaner Air Oregon Baghouse 26 Dust Sampling and Analysis Plan  
Columbia Steel Casting Co., Inc.

Ms. Kronholm,

On December 31, 2020, the Oregon Department of Environmental Quality (DEQ) received the revised Baghouse 26 Dust Sampling and Analysis Plan (SAP) dated December 31, 2020, submitted by SLR International Corporation (SLR) on behalf of Columbia Steel Casting Co., Inc. (CSSC).

In the SAP, CSSC proposes to:

1. Perform random sampling of materials from Baghouse 26 accumulated on-site, stored in 55-gallon collection drums, for analysis.
2. Analyze collected samples for total metals per EPA Method 6020 and hexavalent chromium per EPA Method 7196A.
3. Complete one sampling event in 2021 for the purpose of developing site-specific emission factors for the facility's toxic air contaminant Emissions Inventory for the Toxics Emissions Units controlled by Baghouse 26 no later than February 28, 2021.
4. Complete annual compliance sampling for subsequent years to verify emission rates established in the facility's approved Emissions Inventory.
5. Collect samples immediately upon drum changeout at Baghouse 26.

DEQ approves the facility's SAP with the following conditions:

1. Submit the Sampling and Analysis Report to DEQ no later than March 28, 2021.
2. Incorporate results into your Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan. As cited in DEQ's August 9, 2019 response to Columbia Steel's source testing extension request dated July 17, 2019, your Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan are due within 30 days of receipt of the DEQ approved Source Test Report.

DEQ appreciates your continued assistance with this process. If you have any questions or concerns, please contact me directly.

Sincerely,

Kenzie Billings  
DEQ Air Toxics Project Manager

26-1869 Columbia Steel Casting Co., Inc.

Cc: Marty Cox, Columbia Steel Casting  
Dave Faust, Columbia Steel Casting  
Bruce Schacht, Columbia Steel Casting  
Brien Flanagan, Schwabe  
Keith Johnson, DEQ  
Thomas Rhodes, DEQ  
Steve Dietrich, DEQ  
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