



Oregon

Kate Brown, Governor

Department of Environmental Quality
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November 23, 2020

Bruce Schacht, Environmental Engineer
Columbia Steel Casting Co., Inc.
P.O. Box 83095
Portland, OR 97283

Re: Cleaner Air Oregon Source Testing – Baghouse 26, Columbia Steel Casting Co., Inc.

Mr. Schacht,

On August 18, 2020, Columbia Steel Casting Co., Inc. (Columbia Steel) submitted a Source Test Protocol (Protocol) to the Oregon Department of Environmental Quality (DEQ). DEQ approved the Protocol on September 9, 2020, with a requirement to complete testing by October 16, 2020. On September 17, 2020, Columbia Steel requested to delay source testing to December 2020 due to complications related to wildfires. On September 25, 2020, DEQ approved the extension of the testing, which is now scheduled to be completed December 7, 2020, through December 18, 2020.

The approved Protocol included testing of Baghouse 26, which controls the Main Foundry Table Blast and Blast Room. On November 9, 2020, Columbia Steel requested to remove Baghouse 26 from the Protocol for the following reasons:

1. The Toxics Emissions Units (TEUs) controlled by Baghouse 26 would only be operating for 80 minutes during a 12-hour source test run; and
2. Continuous sampling of Baghouse 26 across a 12-hour source test run would not provide meaningful emission rate data for the purpose of completing a Cleaner Air Oregon Toxic Air Contaminant Emissions Inventory.

Columbia Steel proposes to obtain grab samples of the material collected by Baghouse 26 and perform metals analysis as an alternative to the continuous sampling in the Protocol. Columbia Steel will then apply the metals data to the Particulate Matter (PM) emission factor for this emissions unit, in the current Air Contaminant Discharge Permit (ACDP), in order to calculate Toxic Air Contaminant (TAC) emission rates for this TEU.

DEQ agrees that the short operating time compared to a 12-hour source test run time would likely result in non-detect toxic air contaminant results due to the length of the runs. In this specific instance, DEQ agrees that grab sampling of baghouse material and analysis will result in more representative emission estimates. Please submit a sampling plan for Baghouse 26 by December 4, 2020, in lieu of the source testing procedures that were approved by DEQ.

DEQ appreciates your continued assistance with this process and these source testing results will provide valuable information that will help us better understand emissions from your facility. If you have any questions or concerns, please contact me directly.

Sincerely,

Kenzie Billings
DEQ Air Toxics Project Manager

Cc: Marty Cox, Columbia Steel Casting
Dave Faust, Columbia Steel Casting
Sarah Kronholm, SLR Consulting
Brien Flanagan, Schwabe Williamson and Wyatt
Keith Johnson, DEQ
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