



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
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December 17, 2020

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 4, 2020, the Oregon Department of Environmental Quality (DEQ) received the Baghouse 26 Dust Sampling and Analysis Plan (SAP) dated December 4, 2020 submitted by SLR International Corporation (SLR) on behalf of Columbia Steel Casting Co., Inc. (CSSC). DEQ has completed our review of the SAP. Please submit a revised SAP no later than December 31, 2020.

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.
4. Complete annual compliance sampling for subsequent years to verify emission rates established in the facility's approved Emissions Inventory.

DEQ has the following comments on the SAP:

- a. Samples must be collected immediately upon drum changeout at Baghouse 26 to minimize conversion of the hexavalent chromium to trivalent chromium, which can occur under ambient conditions.
- b. Sampling to develop emission factors as described in number 3, above, must be completed no later than February 28, 2021.
- c. Table 3 of the SAP discusses practical quantitation limits (PQLs) but does not state what those are. The PQL needs to be sufficiently low so that a non-detect result is meaningful. Please provide lab detection limits and PQLs in a revised SAP.
- d. Table 3 states that holding times are presented in Table 1. Please revise this to reference the holding times presented in Table 2.

Please provide a revised SAP no later than December 31, 2020. DEQ appreciates your continued assistance with this process. If you have any questions or concerns, please contact me directly.

26-1869 Columbia Steel Casting Co., Inc.

Sincerely,

Kenzie Billings
DEQ Air Toxics Project Manager

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