



March 10, 2023

Julia DeGagné  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, Oregon 97232

Re: AirArc and Grinding Capture Efficiency Verification Testing, Eagle Foundry Co.

Dear Julia:

On behalf of Eagle Foundry Company (Eagle Foundry), Maul Foster & Alongi, Inc. (MFA) is providing this update regarding the upcoming foundry source testing and AirArc (cutoff) and Grind TEU capture efficiency verification testing.

Bison Engineering will be at the site during the last week of this month (March) to conduct a very complex and expensive source test on the foundry exhaust. Eagle Foundry hoped that Bison would be able to complete the permanent total enclosure (PTE) verification tests on the AirArc and Grind TEU enclosures during that visit. However, the work to prepare for the foundry test has been extensive. This effort included the installation of eight new 4-inch testing ports that will be used by the sample trains. These were installed, and in some cases re-installed, to accommodate the specialized equipment Bison will use. Eagle Foundry has also expended significant time and effort repairing and plugging siding, blinding off wall fans, and installing roof and wall structures to ensure the building will operate as a PTE with no fugitive emissions. Specialty power sources and lift equipment that will be required for the source test have been ordered. Additionally, significant effort has gone into planning to ensure orders and materials will be available to accommodate enough production for lengthy test runs of specific alloys needed for emission factor development.

As for AirArc and Grind, on December 21, 2022, MFA received your letter graciously allowing an extension to March 31, 2023 to provide Eagle Foundry additional time to work with vendors to complete engineering on the capture of these two emission sources in order to verify the capture efficiency. The good news is that AirArc and Grind are nearly ready for testing. However, as you know, Eagle Foundry is a small business with limited personnel; as such, the company's efforts to prepare for the foundry testing leaves them in position to now request limited additional time to accomplish the preparation of testable capture systems for AirArc and Grind.

Accordingly, this letter is being submitted pursuant to OAR 340-245-0030(3). In accordance with OAR 340-245-0030(3)(a), Eagle Foundry has made good progress responding to the requests in the DEQ's December 21, 2022 letter. Extensive progress has been made on re-engineering the way emissions are captured from the AirArc and Grind TEUs to make it easier

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to verify the capture efficiency from those sources. Eagle Foundry has active efforts underway with several outside contractors. You have also received the PTE verification protocol and Bison Engineering has been contracted to complete this evaluation. On behalf of Eagle Foundry, MFA is requesting a short 30-day extension to allow Bison Engineering to return to the facility in April and complete the PTE verification testing. Eagle Foundry can commit to having the AirArc and Grind areas tested by April 30, 2023, with a final report to follow on or before May 15.

MFA is hopeful that you will see this as a reasonable request given the preparation that has gone into ensuring a successful series of foundry tests. Additionally, we believe this does not compromise any timelines as we work toward a revised emissions inventory. The foundry test will be completed by March 31, 2023, well within the 60 days allowed following the source test protocol approval. The source test results are due within 60 days of the test completion. Within 60 days of the DEQ's approval of the source test report, the emissions inventory is due. This timeline means that a final emissions inventory will likely be submitted in July or August, 2023. The results of the AirArc and Grind TEU PTE verification testing will be completed with sufficient time to incorporate revised emission calculations before the emissions inventory is due to be submitted.

We really appreciate your consideration of this request. If you have any questions, please don't hesitate to call me at (503) 523-7142 or reach out to Jack Scott (Eagle Foundry) at (503) 637-3048.

Sincerely,



Chad Darby

cc: Jack Scott, Eagle Foundry