



Oregon

Tina Kotek, Governor

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March 13, 2023

Chad Darby
Maul Foster & Alongi
6 Centerpointe Drive, Suite 360
Lake Oswego, OR 97035
Sent via email only

Re: Extension Request AIRARC and GRIND Capture Efficiency Verification Testing – Eagle Foundry

Chad Darby,

On March 10, 2023, DEQ received a request from Maul Foster & Alongi (MFA) on behalf of Eagle Foundry Company (Eagle) to postpone the upcoming permanent total enclosure (PTE) verification testing for Eagle's cutoff and grinding Toxic Emissions Units (AIRARC [formerly TORCH] and GRIND TEUs). The purpose of this testing, proposed by Eagle, is to inform revised emissions estimates for Eagle's Cleaner Air Oregon (CAO) Emissions Inventory (Inventory). Per [DEQ's letter dated December 21, 2022](#), revised emissions estimates for these two TEUs (as specified in Information Request Items 5 and 6 of DEQ's [November 8, 2022, comment letter](#)) are currently required to be submitted to DEQ no later than March 31, 2023. In the DEQ-approved test protocol submitted on February 16, 2023, Eagle anticipated that the proposed PTE testing would occur the week of March 20, 2023 and that the test report would be submitted no later than March 31, 2023. Eagle now proposes to perform the PTE verification testing for the AIRARC and GRIND TEUs no later than April 30, 2023, and to submit a source test report no later than May 15, 2023, with revised emissions estimates to be incorporated into the Inventory after testing is complete.

DEQ understands that Eagle has made progress in responding to Information Request Items 5 and 6 of DEQ's November 8, 2022, comment letter by submitting a plan to DEQ for PTE verification testing and by working to modify existing equipment to facilitate testing. DEQ further understands that Eagle needs limited additional time to complete these modifications. DEQ agrees that the postponement of the AIRARC and GRIND PTE verification testing is necessary in order to ensure the test results will be representative of expected typical operating conditions, and that these test results are required to support the capture efficiencies Eagle proposes to use in the Inventory. Source testing for Eagle's main foundry processes is anticipated to proceed as scheduled, and the overall timeline for approval of the final Inventory should not be impacted by the requested postponement of the AIRARC and GRIND PTE testing.

For these reasons, DEQ approves the following amendment to the November 8 Information Request:

- The updates to the Inventory specified in Information Request Items 5 and 6 of DEQ's November 8, 2022, comment letter must be submitted no later than **30 days after DEQ's approval of data from both scheduled CAO test events**, including the main foundry/cooling bunker baghouse testing (source test approved February 13, 2023) and the AIRARC and GRIND PTE verification testing.

In accordance with Oregon Administrative Rule ([OAR](#)) [340-245-0030\(2\)](#), DEQ has determined that the following additional information is required in order to approve the Inventory:

1. Perform PTE verification testing for the AIRARC and GRIND TEUs, according to the source test plan approved by DEQ on February 23, 2023:
 - a. Complete source testing **no later than May 1, 2023**; and
 - b. Submit source test results, including the information required in Appendix A of the [DEQ Source Sampling Manual](#), to DEQ **no later than May 15, 2023**.

Please contact me directly at 503.866.9643, julia.degagne@deq.oregon.gov, if you have any questions regarding this extension or the Inventory submittal requirements.

Sincerely,



Julia DeGagné
Air Toxics Project Manager

Cc: Jack Scott, Eagle Foundry Company
Yuki Puram, DEQ
J.R. Giska, DEQ
Thomas Rhodes, DEQ
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