



# Oregon

Kate Brown, Governor

Department of Environmental Quality  
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April 26, 2021

Sarah Kronholm, P.E.  
SLR International Corporation  
1800 Blankenship Road Suite 400  
West Linn, OR 97068

Re: Columbia Steel Casting Co., Inc.  
ACDP No. 26-1869

Ms. Kronholm,

The Oregon Department of Environmental Quality (DEQ) received a revised source test report dated April 9, 2021 from SLR International Corporation (SLR) on behalf of Columbia Steel Casting Co., Inc. (Columbia Steel) as required by the Cleaner Air Oregon (CAO) Program. DEQ also received a sampling report dated March 29, 2021 summarizing testing results for dust collected from Baghouse 26. DEQ's comments are summarized below:

### Source Test Report

The source test report dated April 9, 2021, summarized emissions data for testing completed at Baghouses #1, #2 and #15 and roof vents on Buildings #8 and #11. Based on our review, the source test report is approved with the comments noted in the attached Source Test Review Report Memorandum. DEQ approves the use of substitution values less than the detection limit for samples that were non-detect according to Appendix G of the Recommended Procedures for Toxic Air Contaminant Health Risk Assessments. Samples that were non-detect are identified by footnote (a) of the tables of the attached Source Test Review Report Memorandum.

### Baghouse 26 Dust Sampling Summary Report

The sampling report dated March 29, 2021 summarizes testing results for dust collected from Baghouse 26 and proposes emission factors developed from dust analysis. DEQ approves use of the emission factors developed and proposed in the sampling report but requests that Columbia Steel consider potential emissions of toxic air contaminants not captured by Baghouse 26 and/or not analyzed for during baghouse dust sampling (e.g., aluminum, copper, and zinc) in your Emissions Inventory submittal. Based on our review, the sampling report is approved with the comments noted in the attached Dust Sampling Review Report Memorandum.

### Next Steps

Please submit the Cleaner Air Oregon Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan no later than May 26, 2021. If you have any questions, please contact me directly.

Sincerely,

Kenzie Billings  
DEQ CAO Air Toxics Project Manager

26-1869 Columbia Steel Casting Co., Inc.

Cc: Marty Cox, Columbia Steel Casting  
Bruce Schacht, Columbia Steel Casting  
Adam Bender, Bison Engineering  
Brien Flanagan, Schwabe Williamson and Wyatt  
Keith Johnson, DEQ  
Thomas Rhodes, DEQ  
Anzie St. Clair, DEQ  
David Graiver, DEQ  
File

Attachments: Source Test Review Report Memorandum (April 20, 2021)  
Dust Sampling Review Report Memorandum (April 20, 2021)