



Oregon

Tina Kotek, Governor

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Eagle Foundry Co.
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Eagle Creek, OR 97022-0250
Sent via email only

Jack Scott,

I have reviewed the Main Foundry and Cooling Bunker Baghouse Emission Factor source test report submitted by Eagle Foundry (Eagle) on June 16, 2023. Based on my review of the source test report, DEQ requires that the following issues be addressed in a revised source test report. A revised source test report is due by August 28, 2023.

Method Specific Comments

Method 29

1. Recalculate all lb/ton melted emission factors using the mass emitted through the stack instead of the mass collected in the sample train.
 - a. $\text{Mass emission rate (lb/hr)} \times \text{Sampling time (hr)} / \text{Mass of metal melted (ton melted)} = \text{lbs/ton melted}$
2. The back-half 0.1N HNO₃ rinse blank correction for barium appears to be incorrectly calculated by using the entire mass in the 250 mL blank for the following sets of tests:
 - a. Main Foundry BH Inlet – White Iron
 - b. Cooling Bunker BH Inlet – White Iron
 - c. Cooling Bunker BH Outlet – White Iron
 - d. Main Foundry BH Inlet – Steel Alloy
 - e. Main Foundry BH Outlet – Steel Alloy
 - f. Cooling Bunker BH Inlet – Steel Alloy
 - g. Cooling Bunker BH Outlet – Steel Alloy

The volumes of container #4 received by the lab for the above sets of tests and the final weights for impingers 1-3 suggest that 250 mL of 0.1N HNO₃ was not used for rinse. Section 8.2.8 of Method 29 says to rinse with 100 mL of 0.1N HNO₃. Revise the back-half 0.1N HNO₃ rinse blank for barium using the actual rinse volumes instead of the 250 mL blank volume.

Method 204

1. Revise all diagrams and calculations to include the pouring area inside the foundry building as an emitting point.

DEQ recognizes the unique challenges this testing posed to your facility and operations, and the results will provide valuable information for completing the risk assessment. If you have any questions or concerns please contact me directly at 503-869-0054 or thomas.rhodes@deq.oregon.gov. Thank you for your continued efforts with this process.

Sincerely,

Thomas Rhodes

Thomas Rhodes
DEQ CAO Source Test Coordinator

Cc: Chad Darby, Maul Foster & Alongi
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