



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
Agency Headquarters  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232  
(503) 229-5696  
FAX (503) 229-6124  
TTY 711

November 20, 2023

Eagle Foundry Co.  
PO Box 250  
Eagle Creek, OR 97022-0250  
*Sent via email only*

Jack Scott,

Eagle Foundry (Eagle) was called into the Cleaner Air Oregon (CAO) program on February 1, 2022, and submitted an Emissions Inventory (Inventory) on May 16, 2022, after DEQ granted a 14-day extension. In accordance with Oregon Administrative Rule ([OAR](#)) [340-245-0030\(2\)](#), DEQ issued a written request on November 8, 2022, requiring additional information and a revised Inventory to be submitted by December 28, 2022. On December 12, 2022, Eagle requested, and DEQ granted, extensions to complete source testing and engineering analyses to inform emissions estimates for four Toxics Emissions Units (TEUs): AIRARC, GRIND, MELT and POUR\_COOL, and a shorter extension to complete the requested updates for all other TEUs. Eagle submitted a revised Inventory on January 11, 2023, submitted the results of source testing for GRIND and AIRARC TEUs on May 15, 2023 and June 15, 2023, and submitted the results of source testing for MELT and POUR\_COOL on June 16, 2023 with revised test reports submitted on August 28, 2023, and November 2, 2023. On August 11, 2023, DEQ responded to the January 11, 2023, Inventory submittal with a written request for additional updates.

Per the submittal deadlines set in DEQ's letters dated December 21, 2022, March 13, 2023, and August 11, 2023, a revised Inventory must be submitted to DEQ no later than 30 days after receiving DEQ approval of the source test data. The revised Inventory must include updated emissions for the AIRARC, GRIND, MELT and POUR\_COOL TEUs and the information requested in the August 11, 2023 letter.<sup>1</sup>

This letter serves as notice that **DEQ has approved all required source testing**, completed in March, April, and June, 2023 (see Attachments A and B), and that the revised Inventory is due **by December 20, 2023**. Consistent with Appendix G of DEQ's [Recommended Procedures for Toxic Air Contaminant Health Risk Assessments](#), metals which were below the analytical detection limits for all sample fractions in the baghouse exhausts may be considered to have emission rates of zero in the Inventory – these metals are listed in Items 5 and 6 of Attachment B.

DEQ is requesting that you submit additional information to complete your Inventory. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in [OAR 340-214-0130](#) to identify this information. This

---

<sup>1</sup> As discussed via email with Chad Darby of Maul Foster Alongi on August 16 and August 29, 2023, the methodology from Section 6 ("Finishing Operations") of RTI International's "Emission Estimation Protocol for Iron and Steel Foundries" (December, 2012) is acceptable to use in Eagle's Emissions Inventory for the SHOT and MESH TEUs, as well as for the GRIND TEU. (see <https://www.rti.org/publication/emission-estimation-protocol-iron-and-steel-foundries/fulltext.pdf>). Eagle should use "captured and uncontrolled" and "uncaptured and uncontrolled" emission factors from Table 6-2 as applicable for the SHOT, MESH, and GRIND TEUs, and emission factors, activity values and references in the Inventory should be revised accordingly.

includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss this information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of [OAR 340-245-0030\(1\)](#).

If you have any questions regarding this letter please contact me directly at (503)866-9643 or [julia.degagne@deq.oregon.gov](mailto:julia.degagne@deq.oregon.gov), and I look forward to your continued assistance with this process.

Sincerely,



Julia DeGagné  
Air Toxics Project Manager

Enc: Attachment A: Source Test Review Memorandum for GRIND and AIRARC TEU Testing  
Attachment B: Source Test Review Memorandum for Main Foundry Testing

Cc: Chad Darby, Maul Foster & Alongi, Inc.  
Leslie Riley, Maul Foster & Alongi, Inc.  
Yuki Puram, DEQ  
Thomas Rhodes, DEQ  
J.R. Giska, DEQ  
File