

**From:** [DEGAGNE Julia \\* DEQ](#)  
**To:** [Leslie Riley](#); [Chad Darby \(cdarby@maulfoster.com\)](mailto:cdarby@maulfoster.com); [Jack Scott](#)  
**Cc:** [GISKA JR \\* DEQ](#); [PURAM Yuki \\* DEQ](#)  
**Subject:** Eagle Foundry Emissions Inventory  
**Date:** Tuesday, October 22, 2024 4:46:00 PM  
**Attachments:** [image001.png](#)  
[AQ520Form EF 9.23.2024 DEQ Updates.xlsx](#)

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Hi Jack, Chad, and Leslie:

Thank you for meeting with us on Friday 10/18 to plan for wrapping up Eagle Foundry's CAO Emissions Inventory and moving on to the next steps in the process. As we discussed, I'm attaching a revised version of the AQ520 for your review and input before we issue an approval.

Please review the following list and provide feedback on the AQ520 and the other information listed below by **November 6, 2024**. If you need additional time, please let me know by October 29, 2024.

**Revisions made by DEQ in the attached (highlighted yellow):**

1. Updated the following annual production-weighted average compositions to include all components (added and trace) of the alloys:
  - a. GRIND NSS\_C and GRIND NSS\_F:
    - i. Nickel = 0.80 percent
    - ii. Molybdenum trioxide = 0.74 percent (molybdenum = 0.49 percent)
    - iii. Phosphorus = 0.09 percent
  - b. AIR ARC:
    - i. Phosphorus = 0.059 percent
    - ii. Copper = 0.11 percent
    - iii. Molybdenum trioxide = 0.70 percent (0.46 percent molybdenum)
2. Updated the following slag handling emission factors to be consistent with the analytical data:
  - a. Chromium VI: Sample result was 15.5 mg/kg; percent of PM = 0.00155 percent.
  - b. Nickel: Sample result was 38.6 mg/kg; percent of PM = 0.00386 percent.
3. Updated welding emissions for the Lincore M wire to use FCAW fume generation rate and fume correction factor for nickel and manganese (the formula was already corrected for Chromium VI).
4. Updated the annual throughput for the S\_PALMER TEU from 14.8 to 14.948 tons of PM generated for consistency with the supporting calculations (the emissions are correct in AQ520).
5. Added "Velvacoat St 803 - Mold Wash Z" to the AQ520 for the MOLD\_SP TEU.
6. For exempt TEUs on Worksheet 2:
  - a. Added TEU IDs

- b. Consolidated raw materials handling into a single exempt TEU
  - c. Added one exempt diesel tank
7. For TEU D1-5, updated the "Reference/Notes" column to include that TAC speciation comes from the product SDS for crystalline silica.

**Other Information requested:**

- 8. Provide the number, size, and approximate annual throughput for the propane storage tanks and diesel storage tank.
- 9. Review and update the actual annual and daily throughputs for Coated Cerabead, G-29 sand, and Naigai Cerabead usage (TEUs MOLD\_SP and MOLD\_BP) to include recycled as well as purchased material, as appropriate (these cells are highlighted orange in the AQ520).
- 10. In Table D2 in the supporting calculations workbook, correct the missing references/values for RBCs in column I.
- 11. Provide a redacted version of the slag analytical data that removes any "Attorney-Client Privilege" notes.
- 12. Provide an updated version of the supporting calculations.

Finally, I've confirmed that the provisional Manganese Acute TRV that DEQ will be proposing during the formal TRV rulemaking will be  $1.3 \mu\text{g}/\text{m}^3$  (rounded up from  $1.25 \mu\text{g}/\text{m}^3$ ).

Thank you again for your assistance throughout the EI review process – I look forward to moving on with the risk assessment.

Sincerely,



Julia DeGagné, P.E. (she/her)  
Cleaner Air Oregon Project Engineer  
Oregon Department of Environmental Quality  
700 NE Multnomah St. Ste 600  
Portland, OR 97232  
Cell: 503-866-9643