



Oregon

Tina Kotek, Governor

Department of Environmental Quality
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December 4, 2024

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

Jack Scott,

DEQ has reviewed and approves the Cleaner Air Oregon (CAO) Emissions Inventory for Eagle Foundry Co. in Eagle Creek, OR, submitted on November 6, 2024, with the following condition:

1. Concurrent with submittal of the Modeling Protocol, please also submit an updated AQ520 (Emissions Inventory) form including the following revisions:
 - a. Update the Toxics Emissions Unit (TEU) ID for the small Palmer Velvacoat ST 803 material usage (Worksheet 2, cell A31) to "MOLD_SP_V" instead of "MOLD_BP_V", for consistency with the emissions in Worksheet 3 of the AQ520 form; and
 - b. Update the actual daily throughputs for Coated Cerabead, G-29 Sand, and Naigai Cerabead usage (TEUs MOLD_SP_CC, MOLD_SP_G, MOLD_SP_C and MOLD_BP_C) to include recycled as well as purchased material.

This approval includes DEQ's determination that certain raw material handling activities meet the criteria for Exempt TEUs under Cleaner Air Oregon rules [OAR 340-245-0060\(3\)\(a\)](#) – this includes storage and handling of clean bulk scrap, High Carbon Ferrous Chromium, and raw alloys delivered in super sacks, drums or cans. Based on knowledge of the types of materials being stored, Safety Data Sheets provided, and Eagle Foundry's stated methods of storage and transfer of these products, DEQ estimates that emissions from these activities are unlikely to materially contribute to potential health risks due to toxic air contaminants. This determination is limited to the types of raw materials and handling methods described in Eagle Foundry's submittal materials dated January 10, 2024, and September 23, 2024.

The next step in the CAO process is to submit a Modeling Protocol by no later than thirty (30) days from the date of this letter, **by January 3, 2025**. [[OAR 340-245-0030\(1\)\(b\)](#)] Modeling Protocol requirements are listed in [OAR 340-245-0210\(1\)\(a\)](#). If you plan to complete a Level 3 or 4 Risk Assessment, your Risk Assessment Work Plan (RAWP) must be submitted to DEQ by no later than sixty (60) days from the date of this letter, **by February 3, 2025**. [[OAR 340-245-0030\(1\)\(c\)](#)] RAWP requirements are listed in [OAR 340-245-0210\(2\)](#).

Information about CAO permitting, including a flow chart showing the risk assessment process can be found on the CAO [Step-by-Step Guide for Facilities webpage](#).

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

Sincerely,

Julia DeGagne

Julia DeGagné
Cleaner Air Oregon Project Engineer

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