



December 11, 2024

Julia DeGagné
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232 Company

Re: Extension Request for Submittal of the Cleaner Air Oregon Modeling Protocol
Eagle Foundry Co.—Eagle Creek, Oregon

Dear Julia:

Eagle Foundry Co. (Eagle Foundry) received written approval of the Cleaner Air Oregon (CAO) emissions inventory by letter (the Letter) from the Oregon Department of Environmental Quality (DEQ) on December 4, 2024. As stated in the Letter, the DEQ is requesting the CAO Modeling Protocol be submitted by January 3, 2025. With this letter, on behalf of Eagle Foundry, Maul Foster & Alongi (MFA) is formally requesting an extension to the Modeling Protocol deadline.

As we discussed by phone on October 18, Eagle Foundry is requesting to submit a combined Modeling Protocol, Risk Assessment Work Plan, and Risk Assessment Report (Combined Report) in one document. For a number of reasons (e.g., pending retirement of Eagle Foundry's senior staff member who has managed the CAO project since the company's call-in, the length of time and cost of this program to Eagle Foundry to date), we feel it's in the best interests of Eagle Foundry and the DEQ to conclude this process as quickly as possible. However, a combined report and all the underlying work cannot be completed in 30 days.

As a result, Eagle Foundry is kindly requesting the Combined Report deadline be set at 90 days from the date of your approval letter, establishing a new deadline on March 4, 2025. This proposed due date will allow Eagle Foundry to submit the risk assessment a minimum of three months earlier than if they followed the typical schedule and submitted three sequential reports.

This letter is being submitted pursuant to OAR 340-245-0030(3). In accordance with OAR 340-245-0030(3)(a), Eagle Foundry has made good progress responding to the DEQ's requests and now has an approved emissions inventory. Since receiving the Letter, Eagle Foundry and MFA have been working on the Combined Report and have made significant progress.

Thank you for your consideration of this request. I look forward to hearing back from you soon.

Sincerely,

Maul Foster & Alongi, Inc.

Chad Darby
Principal Air Quality Specialist

cc: Jack Scott, Eagle Foundry
Greg Lasslett, Eagle Foundry
J.R.Giska, Oregon Department of Environmental Quality