

From: [DEGAGNE Julia * DEQ](#)
To: "Leslie Riley"; [Greg Lasslett](#)
Cc: [MEYERS Lindsey * DEQ](#); [GISKA JR * DEQ](#); [DEVITA-MCBRIDE Amy * DEQ](#)
Subject: Eagle Foundry Risk Assessment - DEQ Response
Date: Tuesday, December 23, 2025 2:42:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[TaxParcels_AQ521.csv](#)

Hi Leslie and Greg,

DEQ has finished our review of Eagle Foundry's revised CAO Risk Assessment, and there are a couple of items we need before we can finalize an approval. Please provide the following by **January 12, 2026**:

1. The supporting documentation (mentioned in Eagle's 10/27/2025 cover letter) describing how stack parameters were verified; and
2. An Exposure Location Change Request Form ([AQ521](#)) and Exposure Location Change Request Table ([AQ522](#)) requesting to designate Exclusive Farm Use zoning as worker or acute-only instead of residential. The Clackamas County zoning [ordinance](#) indicates that multiple dwellings may be constructed on a tract or tax lot, so we will need that documentation for tax lots that don't have all possible dwellings already constructed. I've attached a list of the tax lots that we believe this applies to – please let me know if you have any questions about this.

In our review we noted a few minor issues that we do not believe will impact risk significantly. I reviewed these with Leslie this morning. At this time our plan is to note them in our approval letter rather than require a revision of the Risk Assessment. They are:

- Figure 4-4: The revised designation of fenceline receptors on the south edge of the property from residential to worker may be the result of slight differences between zoning maps and the property boundary. The intent of fenceline receptors is to evaluate risk just outside of the facility's boundary, not risk to facility workers within the boundary. For this facility, the modeling appears to be sufficient to identify the approximate location of highest residential risk. However, if future modeling is performed, the fenceline receptors in this area (slightly adjusted to be outside of the property boundary, if necessary) should be evaluated for residential exposure.
- Table 6-1: Given the title of this table and the way the location of maximum risk is repeated for each TEU, it could be interpreted that the locations apply to individual TEUs rather than the exposure scenario with the highest cumulative risk. To avoid this potential confusion, it would be better in future submittals to state the maximum location once for each exposure scenario (such as residential cancer).

I will be out of the office from December 29 – January 2. If you need more time to respond to this request, please let me know by this Friday (12/26) if possible. I will send back the CAO Risk Assessment application in Your DEQ Online shortly so that you can submit Items 1 and 2 above through YDO.

Sincerely,



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