



Oregon

Tina Kotek, Governor

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January 21, 2026

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

Greg Lasslett,

DEQ has completed its review and approves the Cleaner Air Oregon (CAO) Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan, and Level 3 Risk Assessment submitted on October 27, 2025, by Eagle Foundry Co. (Eagle Foundry) in Eagle Creek, OR (Your DEQ Online [YDO] submittal # 64030). This approval is in accordance with [Oregon Administrative Rule \(OAR\) 340-245-0050\(1\)](#) and [OAR 340-245-0030](#).

DEQ is not requiring updates to the Risk Assessment at this time but has the following comments regarding the submittal that should be incorporated into future risk assessments:

1. Fenceline receptors on the south edge of the property should be evaluated for residential exposure and slightly adjusted to be outside of the property boundary if necessary. The revised designation of fenceline receptors from residential to worker in the most recently submitted risk assessment may be the result of slight differences between zoning maps and the property boundary; however, 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 submitted appears to be sufficient to identify the approximate location of highest residential risk.
2. For clarity, the title of Table 6-1 should be updated and the maximum risk location stated just once for each exposure scenario. Given the current title of this table and the way the location of maximum risk is repeated for each Toxics Emissions Unit (TEU), it could be interpreted that the locations apply to individual TEUs rather than the exposure scenario with the highest cumulative risk.
3. When calculating the average stack velocity using EPA Reference Method 2, equation 2-7 uses the average of the square roots of the individual velocity head (ΔP) values, rather than the square root of the average ΔP . Making this change to calculations results in minor differences in stack velocity which are not likely to significantly impact modeled risk.

The resulting Residential Excess Cancer Risk of 17.45 (rounded to 17)¹ and Chronic Noncancer Hazard Index of 0.8 (rounded to 1), as determined by the Risk Assessment, exceed the Source Permit Risk Action Level for existing sources. The resulting Acute Hazard Index of 2.2 (rounded to 2) exceeds the Community Engagement Risk Action Level. [[OAR 340-245-8010, Table 1](#)] Other risk values for this facility do not exceed the Source Permit Level. This means that formal community engagement will be required, and Source Risk Limits will be required in the permit to limit the risk from toxic air contaminant

¹ Rounding is in accordance with [OAR 340-245-0200\(4\)](#).

emissions from this facility.

The next step is for Eagle Foundry to submit a completed [AQ501 CAO Permit Application Form](#) in YDO, along with the following required fees, by no later than **February 20, 2026**. [[OAR 340-216-8030 Table 3](#), [OAR 340-245-0030](#)]. Note that an additional 4 percent technology fee will be applied to payments in YDO.

▪ Level 3 Risk Assessment – not de minimis, Standard ACDP		\$11,831
▪ Community Engagement Meeting Fee – low	+	\$1,047
▪ Source Test Review Fee – complex	+	\$6,282
	Total Fee Due	\$19,160

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 DeGagné
Cleaner Air Oregon Project Engineer

Cc: Leslie Riley, Maul Foster & Alongi
Joules Vaca, DEQ
J.R. Giska, DEQ
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