



**Cascade Steel Rolling Mills, Inc.**  
 3200 North Hwy 99W  
 McMinnville, OR 97128



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August 9, 2023

Ms. Julia Degagné  
 Air Toxics Project Manager  
 Oregon Department of Environmental Quality  
 Northwest Region  
 700 NE Multnomah Street, Suite 600  
 Portland, OR 97232

via email: [Julia.degagne@deq.state.or.us](mailto:Julia.degagne@deq.state.or.us)

**Re: Cascade Steel Rolling Mills, Inc.  
 CAO Emissions Inventory**

Dear Ms. Degagné:

Today we are submitting a revision to our Cleaner Air Oregon Emissions Inventory. The revision addresses changes to emission rates of the following pollutants:

<u>Pollutant</u>	<u>CASRN/ DEQ SEQ ID</u>
PCDD/Fs TEQ	646
PCBs TEQ	645
Total PCBs	1336-36-3
PAHs	401
Benzo[a]pyrene	50-32-8

DEQ's December 13, 2022 Warning Letter with Opportunity to Correct (WLOC) requested that Cascade use DEQ provided emission factors to estimate emissions of these pollutants from Emissions Unit EU-1 Melt Shop Baghouses. These emission factors are not specific to our site and operations. As expressed in our response to the December WLOC, and subsequent responses, we remain concerned that using default emission factors that were derived from tests on or information from different sources will result in an Emissions Inventory that is not representative of our operations. As such, we are submitting this revision using site specific information as described below.

Melt Shop activities are controlled by Baghouses BH-1, BH-1A and BH-2. BH-1 and BH-1A is a manifolded system of two baghouses filtering the same inlet air stream from the Melt Shop and baghouse dust is collected at a common point. BH-2 has a separate dust collection system. The baghouses have undergone considerable source testing for particulate matter including nine tests since 2006. All tests were performed in accordance with a DEQ approved source test plan.

As described in the Emission Inventory supporting calculations, Cascade undertook a baghouse dust sampling and analysis effort including the collection of a composite sample during the first three months of 2023 and a discrete sample in April. The baghouse dust was analyzed for the

pollutants listed above and the analytical reports are included with the revised Emissions Inventory Supporting Information document also being submitted today.

To derive the site-specific emission factors presented in the revised inventory, we multiplied the concentrations of these pollutants in the baghouse dust with the particulate matter emission factors determined by the baghouse source testing. Additional information, including detailed data reduction and calculations, are provided in the electronically submitted Emissions Inventory supporting calculations spreadsheet. We note that while PAHs are considered semi-volatile pollutants, their concentrations in the baghouse dust can be representative of baghouse air emissions based on the (low) temperatures existing within the baghouse (generally less than 160F based on a review of the source test data). One exception is naphthalene; due to its volatility, we are not proposing to change the emission factor for naphthalene.

We appreciate maintaining a productive dialog as we work with DEQ to finalize our emissions inventory using the best data and science and in an expeditious manner. Please let us know if you have any questions or would like to discuss these revisions further.

Sincerely,

A handwritten signature in cursive script that reads "Jim Spahr".

Jim Spahr

Cc: Geoff Tichenor  
John Browning