



Oregon

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September 29, 2023

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

Sent via email only

Jim Spahr,

Cascade Steel Rolling Mills, Inc. (CSRSM) was called into the Cleaner Air Oregon (CAO) program on February 7, 2022, and submitted an Emissions Inventory (Inventory) on May 9, 2022. In accordance with Oregon Administrative Rule ([OAR 340-245-0030\(2\)](#)), DEQ issued a written request on August 26, 2022, requiring additional information and a revised Inventory to be submitted by October 10, 2022. CSRSM submitted a revised Inventory on October 10, 2022, but did not provide all the revisions, corrections, and additional information necessary to approve the Inventory as requested in DEQ's August 26, 2022, letter. DEQ issued CSRSM a Warning Letter with Opportunity to Correct (WLOC) on December 13, 2022, citing CSRSM for violation of [OAR 340-245-0040\(1\)&\(4\)](#) and allowing for corrective actions to be completed by February 13, 2023. CSRSM provided a revised Inventory and supporting documentation on February 13, 2023. DEQ requested additional updates on May 4, 2023, and CSRSM provided updated Inventories on July 3, 2023, and August 9, 2023.

DEQ has reviewed the Inventory and identified additional updates that are needed before approval. In accordance with [OAR 340-245-0030\(4\)\(b\)](#), DEQ is providing CSRSM with a revised deadline for submittal. Please submit the information specified below **by October 20, 2023**.

1. Submit to DEQ a revised Inventory (AQ520 form), along with all supporting calculations in Excel format, as well as all information required under [OAR 340-245-0040\(4\)](#), including the following updates:
 - a. Melt shop fugitives (TEU EU-3_MF):
 - i. Revise the emissions estimate for hydrogen fluoride (CASRN 7664-39-3) as follows: back-calculate fugitive emissions using the emission factors for TEU EU-1 (BH01 and BH01A), assuming 0 percent control efficiency and 95 percent capture efficiency for the baghouses, with uncaptured emissions allocated to the TEU EU-3_MF;

- ii. Update emissions and emission factors in Tab 3 of the AQ520 form for the following TACs to be consistent with the supporting calculations submitted on August 9, 2023:
 - 1. Polychlorinated dibenzo-p-dioxins (PCDDs) & dibenzofurans (PCDFs) TEQ (DEQ ID 646);
 - 2. Polychlorinated biphenyls (PCBs) TEQ (DEQ ID 645); and
 - 3. Benzo[a]pyrene (CASRN 50-32-8); and
- iii. In Tab 3 of the AQ520 form, include emissions for total PCBs (CASRN 1336-36-3) to be consistent with the supporting calculations submitted on August 9, 2023;
- b. Melt shop (TEUs EU-1 and EU-3): In Tab 3 of the AQ520 form, remove the line item for polycyclic aromatic hydrocarbons (PAHs) (DEQ ID 401) and report mass emissions in pounds for the following PAHs by individual CASRN:
 - 1. Acenaphthylene (CASRN 208-96-8);
 - 2. Acenaphthene (CASRN 83-32-9);
 - 3. Fluorene (CASRN 86-73-7);
 - 4. Phenanthrene (CASRN 85-01-8);
 - 5. Anthracene (CASRN 120-12-7);
 - 6. Fluoranthene (206-44-0)
 - 7. Pyrene (CASRN 129-00-0);
 - 8. Benz[a]anthracene (CASRN 56-55-3);
 - 9. Chrysene (CASRN 218-01-9);
 - 10. Benzo[b]fluoranthene (CASRN 205-99-2);
 - 11. Benzo[k]fluoranthene (CASRN 207-08-9);
 - 12. Benzo[e]pyrene (CASRN 192-97-2);
 - 13. Perylene (CASRN 198-55-0);
 - 14. Indeno[1,2,3-cd]pyrene CASRN (193-39-5);
 - 15. Dibenz[a,h]anthracene (CASRN 53-70-3); and
 - 16. Benzo[g,h,i]perylene (CASRN 191-24-2);
- c. Scrap handling (TEU EU-09sh Main and TEU EU-09sh Sec): In Tab 2 of the AQ520 form, update the annual actual throughput values to be consistent with Part B of the 2021 Annual Report, which lists a total of 502,562 tons of scrap handled;
- d. Welding (TEU EU-17):
 - i. In Tab 2 of the AQ520 form:
 - 1. Add a note describing the proposed control device (fume extractor with MERV-14 filters) to column C; and
 - 2. Update actual annual usage estimate to be consistent with the general assumption that actual usage is 80 percent of Requested Potential to Emit, or provide the rationale for the value reported;
 - ii. For the FCAW E71T electrode type, update emissions to include:
 - 1. Molybdenum trioxide (CASRN 1313-27-5), assuming 100 percent conversion of molybdenum to molybdenum trioxide; and

2. Crystalline silica (listed in the Safety Data Sheet as CASRN 14808-60-7) – report this on the AQ520 form as “Silica, crystalline (respirable)” (CASRN 7631-86-9); and
 - iii. For the FCAW E71T and SMAW E7018 electrode types, report emissions for aluminum oxide as “aluminum and compounds” (CASRN 7429-90-5) rather than “aluminum oxide (fibrous forms)” (CASRN 1344-28-1), as welding emissions are not known to be fibrous;
- e. Raw materials handling (TEU EU-18): update raw materials handling emissions as follows:
- i. For TEUs EU-18_ATDSiMn and EU-18_ATDFeMn (alloy truck dump to storage bunker):
 1. Update the PM10 control efficiency for the three-sided enclosure to 63 percent, based on the Nebraska Department of Environment and Energy’s three-sided enclosure particulate matter (PM) control efficiency for grain handling (revised to account for the assumed particle size distribution for raw materials handling – see Attachment A); and
 2. In Tab 2 of the AQ520 form, add a note describing the proposed control device (three-sided enclosure) in column C;
 - ii. For TEUs EU-18_ATDSiMn and EU-18_AULDSiMn, update the composition to 75.5 percent manganese by weight, which represents the midpoint of the range provided in the Safety Data Sheet (SDS) (the product is greater than 65 percent manganese and greater than 14 percent silicon; therefore the potential range for manganese is between 65 and 86 percent);
 - iii. For TEUs EU-18_ATDFeMn and EU-18_AULDFeMn, update the composition to 89 percent manganese by weight, which represents the midpoint of the range provided in the SDS (the product is greater than 78 percent manganese; therefore the potential range for manganese is between 78 and 100 percent);
 - iv. For TEU EU-18_AULDFeMn: In Tab 3 of the AQ520 form, include emissions for manganese (CASRN 7439-96-5), chromium VI (CASRN 18540-29-9) and nickel (DEQ ID 365) and remove emissions for phosphorus (DEQ ID 504), for consistency with the supporting calculations; and
- f. Slag handling (TEU EU-5): In Tab 3 of the AQ520 form, include emissions for fluorides (DEQ ID 239) as reported in the supporting calculations submitted on August 9, 2023.

DEQ is requesting that you submit additional information to complete your Inventory. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in [OAR 340-214-0130](#) to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss this information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of [OAR 340-245-0030\(1\)](#).

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

Sincerely,

A handwritten signature in cursive script that reads "Julia DeGagne".

Julia DeGagné
Air Toxics Project Manager

Enc: Attachment A – Three-Sided Enclosure Particulate Matter Control Workbook

Cc: Daniel Lee, CSR
Tim Sturdavant, CSR
Jason Young, CSR
Stanley N. Alpert, CSR
Geoff Tichenor, Steel Rives
Tom Wood, Steel Rives
John Browning, Bridgewater Group
Michael Eisele, DEQ
J.R. Giska, DEQ
Zach Loboy, DEQ
File