



Oregon

Tina Kotek, Governor

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October 3, 2023

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

Sent via email only

Jim Spahr,

This letter is an addendum to the request that DEQ sent to Cascade Steel Rolling Mills, Inc. (CSRМ) on September 29, 2023, regarding updates to CSRМ's Cleaner Air Oregon (CAO) Emissions Inventory (Inventory). DEQ has identified an additional update that is needed before approval and, in accordance with [OAR 340-245-0030\(4\)\(b\)](#), is providing CSRМ with a revised deadline for submittal of a revised Inventory. Please submit to DEQ the information listed below, as well as the information requested in DEQ's September 29, 2023 letter, **by October 24, 2023**.

General Comment

DEQ has reviewed CSRМ's proposal to address the potential overestimation of fugitive emissions from scrap handling. CSRМ has proposed to adjust the throughput values of scrap material transferred to account for the fact that "a very large portion of metal scrap is not available under typical handling techniques to be emitted as particulate owing to the fact that the material is bound in a solid metal matrix." While it is reasonable to assume that emissions from scrap handling may differ from other raw material types, CSRМ has not provided specific data or sufficient evidence to support a departure from the generally recommended methodology for estimation of fugitive dust emissions from material handling activities at steel foundries. Specifically, the following sources support the use of the predictive "drop point" equation (AP-42 section 13.2.4, Equation 1) without adjustment:

- AP-42, Section 12.5 ("Iron and Steel Production") recommends the drop point equation for outdoor raw materials handling at specific steel producing facilities;¹
- Section 2 of RTI International's "Emission Estimation Protocol for Iron and Steel Foundries" document recommends the drop point equation for handling of raw materials, including scrap metal;²

¹ AP-42 Section 12.5.2.9 ("Iron and Steel Production"), revised 10/86 (reformatted 1/95).

(<https://www3.epa.gov/ttnchie1/ap42/ch12/final/c12s05.pdf>)

² RTI International, Emission Estimation Protocol for Iron and Steel Foundries (December, 2012).

(<https://www.rti.org/publication/emission-estimation-protocol-iron-and-steel-foundries/fulltext.pdf>).

- CSRMs current Title V permit is based on projected particulate matter emissions from scrap handling that are consistent with those obtained from use of the drop point equation.³

Fugitive emissions may vary with the characteristics of the material handled; however, the drop point equation retains its validity over a wide range of silt contents (see AP-42 section 13.2.4.3). Therefore, DEQ will not approve the use of the proposed adjusted methodology without additional supporting emissions data or evidence.

Specific Comment

1. Please submit to DEQ a revised Inventory (AQ520 form) and supporting calculations in Excel format, including the following update:
 - g. Scrap handling (TEU EU-09sh_Main and TEU EU-09sh_Sec):
 - i. Update the supporting calculations (“Tab1_B1_Scrap” Tab) to remove the “scrap handling mass adjustment factor” of 0.1 – use the unadjusted drop point equation (AP-42 Section 13.2.4, Equation 1) to estimate emissions as requested in item 1.c. of DEQ’s letter to CSRMs dated May 4, 2023;
 - ii. Update the throughput values in Tab 2 of the AQ520 form to reflect the full amounts of actual and potential scrap handled annually and daily; and
 - iii. Update the emissions in Tab 3 of the AQ520 form to apply the scrap handling emission factors to the updated throughputs.

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.

³ Title V Review Report 36-5034-TV-01, Appendix A.
(https://www.deq.state.or.us/AQPermitsonline/36-5034-TV-01_RR_2020.PDF)

Sincerely,

Julia DeGagne

Julia DeGagné
Air Toxics Project Manager

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