



Oregon

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October 18, 2023

Cascade Steel Rolling Mills, Inc.
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Sent via email only

Jim Spahr,

On October 9, 2023, DEQ received a request from Cascade Steel Rolling Mills, Inc. (CSRSM) for a 59-day partial extension of the deadline for submittal of a revised Cleaner Air Oregon (CAO) Emissions Inventory (Inventory). As specified in DEQ's October 3, 2023, letter, the revised Inventory is currently due on October 24, 2023. CSRSM is requesting additional time to prepare responses to Items 1.a.i, 1.e, and 1.g of the DEQ's information request letters dated September 29, 2023 and October 3, 2023 (Comment Letters). CSRSM proposes to submit responses to all other items by the October 24, 2023, due date. DEQ met with CSRSM staff on September 22, 2023, to discuss the Inventory and again on October 12, 2023, to discuss a possible extension of the deadline. Specifically, CSRSM is seeking additional time to respond to the following requests:

(1) *Item 1.e: Update the control efficiency for the three-sided enclosure for TEUs EU-18_ATDSiMn and EU-18_ATDFeMn.* CSRSM's estimate of 85 percent control represents the high end of a wide range of efficiencies for partial enclosures, as cited in documentation provided by CSRSM in their August 9, 2023, Inventory submittal. Based on the information DEQ has currently, we have requested a more conservative estimate of 63 percent. As discussed on October 12, 2023, CSRSM is requesting additional time to review DEQ's requested update as well as other alternatives for reducing emissions, such as increasing moisture content of the material.

(2) *Item 1.g: Update the scrap handling emissions calculations (TEUs EU-09sh_Main and TEU EU-09sh_Sec) to use the unadjusted "drop point equation".* Based on our conversation on October 12, 2023, DEQ understands that CSRSM is requesting additional time to consider the feasibility of an on-site study to better estimate emissions from scrap handling. DEQ first requested the use of the drop point equation in a letter to CSRSM on May 4, 2023.

(3) *Item 1.a.i: Revise the emissions estimate for fugitive hydrogen fluoride emissions from TEU EU-3_MF, assuming 0 percent control efficiency and 95 percent capture efficiency for the baghouses.* Based on our conversation on October 12, 2023, DEQ understands that CSRSM is requesting additional time for its consultants to conduct a site visit and develop an updated engineering estimate for the proportion of hydrogen fluoride emissions that are fugitive. DEQ's requested update uses the same assumptions CSRSM is currently using in the Inventory for other non-particulate emissions from this activity.

DEQ may grant an extension based on the criteria set in [OAR 340-245-0030\(3\)](#), which require sources to demonstrate progress towards completing the submittal and show that a delay is necessary for good cause.

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Based information that CSRM shared with DEQ in a meeting on October 12, 2023, CSRM has demonstrated progress in responding to the Comment Letters by beginning to evaluate potential controls and/or alternative emissions estimation methods related to three of DEQ's requested updates.

DEQ agrees that a delay may be necessary in order for CSRM to review the supporting documentation and available data and discuss alternatives with DEQ regarding Items 1.e, 1.g, and 1.a.i of the Comment Letters. However, DEQ remains committed to completing the CAO process expeditiously and believes that the existing data and methodologies requested by DEQ are sufficient to estimate emissions from these activities for the purposes of completing your Risk Assessment. For these reasons, additional time will not be granted for site-specific data collection at this time. DEQ appreciates CSRM's commitment to reducing uncertainty in its emissions estimates, and is committed to revising emissions information if more representative data become available at any time during the CAO process.

If CSRM decides to conduct additional on-site data collection, DEQ strongly recommends that a test plan be submitted for DEQ approval prior to initiating any field studies to ensure that the resulting data will be acceptable for use in the Inventory.

DEQ approves CSRM's request but will grant only a 21-day extension from the original submittal deadline of October 24, 2023. Although CSRM has not requested an extension for the full Inventory, DEQ is extending the due date for all Items in both Comment Letters so that CSRM can submit a complete Inventory. CSRM's revised Inventory must be submitted by no later than **November 14, 2023**.

DEQ remains available to meet with CSRM or provide feedback via email. Please contact me directly at 503.866.9643 or julia.degagne@deq.oregon.gov, if you have any questions regarding this extension or the Inventory submittal requirements.

Sincerely,



Julia DeGagné
Air Toxics Project Manager

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