



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Agency Headquarters
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

January 8, 2024

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

Sent via email only

Jim Spahr,

Cascade Steel Rolling Mills, Inc. (CSRM) 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. CSRM 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 CSRM a Warning Letter with Opportunity to Correct (WLOC) on December 13, 2022, citing CSRM for violation of [OAR 340-245-0040\(1\)&\(4\)](#) and allowing for corrective actions to be completed by February 13, 2023. CSRM provided a revised Inventory and supporting documentation on February 13, 2023. DEQ requested additional updates on May 4, 2023, and CSRM provided updated Inventories on July 3, 2023, and August 9, 2023. DEQ requested additional updates on September 29, 2023 and October 3, 2023, and CSRM provided an updated Inventory on November 14, 2023.

On December 13, 2023, DEQ met with CSRM to discuss the Inventory and indicated that DEQ does not accept CSRM's proposed emissions estimation method for scrap handling activities as a representative methodology for this activity. DEQ proposed that if CSRM commits to implementing a fugitive dust control plan for scrap handling that includes installing equipment for wetting the material prior to handling, DEQ would consider updates to the scrap handling emissions estimation methodology that include water spray controls. On January 2, 2024, CSRM emailed DEQ an update describing CSRM's progress in determining the feasibility of spray controls for its scrap handling activities and proposed to provide another update regarding feasibility and implementation timelines by January 22, 2024.

In accordance with [OAR 340-245-0030\(4\)\(b\)](#), DEQ is providing CSRM with a revised deadline for submittal of information needed to approve the Inventory. DEQ is requesting that CSRM provide the following specifics and deliverables **by January 22, 2024**:

1. Indication of whether or not CSRM will be installing water sprays to control fugitive emissions from scrap handling;
2. If water spray controls will be installed, provide:
 - a. A general description of the scope of the proposed system and how it will control fugitive emissions from scrap handling activities, including:
 - i. Where the spray controls will be installed; and
 - ii. When spray controls would be utilized;
 - b. A timeline for submittal of a Notice of Approval for installation of these controls with a completion date no later than June 1, 2024; and
 - c. A specific proposal for incorporating the control into the Inventory. DEQ will accept the use of the drop point equation (AP-42 Section 13.2.4, Equation 1) with an initial assumed moisture content of 0.25 percent, together with the application of documented control efficiencies for dust suppression by water sprays from AP-42 Appendix B.2¹. If an alternative method is proposed, please provide quantitative justification for the proposed control efficiency; and
3. If water spray controls will not be installed, submit a revised Inventory using the unadjusted drop point equation as requested in DEQ's October 3, 2023, letter. As discussed in our meeting on December 13, 2023, DEQ will consider revising the emission factors if representative sampling data becomes available in the future.

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,



Julia DeGagné

¹ US EPA. AP-42 Appendix B.2 "Generalized Particle Distributions", Table B.2-3 ("Typical Collection Efficiencies of Various Particulate Control Devices"). September 1990 (Reformatted January 1995). Available at: <https://www3.epa.gov/ttnchie1/ap42/appendix/appb-2.pdf>

Air Toxics Project Manager

Cc: John Browning, Bridgewater Group
Geoff Tichenor, Stoel Rives
Michael Eisele, DEQ
J.R. Giska, DEQ
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