



a Radius Recycling company



January 22, 2024

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

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

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

Dear Ms. Degagné:

As discussed during our meeting on January 18, 2024 we are in receipt of your letter dated January 8, 2024 requesting additional information relative to our Cleaner Air Oregon Emissions Inventory (Inventory). In general, your letter requested that we provide information on the feasibility, scope, and schedule for installing water sprays to control fugitive emissions from scrap handling, should we decide to implement such controls, and, should water spray controls not be installed, to submit a revised Inventory using an unadjusted drop equation methodology to estimate emissions from scrap handling. The purpose of this letter is to request an extension until March 1, 2024 to prepare and submit our response to the information request.

OAR 340-245-0030(3) authorizes DEQ to grant an extension to a deadline associated with an information request where (a) the owner has demonstrated progress in completing the submittal and (b) a delay is necessary to obtaining more accurate or new data, perform additional analyses, or address changes in operations or other key parameters, any of which are likely to have a substantive impact on the outcomes of the submittal. During our meeting we described how we have contacted others in the industry and learned of two other facilities that apparently have implemented a water spray system. We have arranged to conduct a site visit with one of the facilities to learn more about how they operate their system. We expect that visit will occur within one to two weeks. As such, we believe that we meet the first extension criterion (i.e., demonstrating progress) as we are continuing to engage with DEQ and other facilities on evaluating the technical aspects of a water spray system (including evaluating whether such a system is safe and feasible for application at CSRM). The information will assist us with completing the submittal.

We believe that we meet the second criterion based on the additional time needed to accurately prepare responses to the more complex questions raised in DEQ's January 8 letter. These complex questions include: (1) DEQ's request to provide a general description of the scope of the proposed water spray system and how it will control emissions, where the controls will be installed, and when they will be utilized (item 2.a), (2) A timeline for submittal of a Notice of Approval for installation of these controls (DEQ's letter requests that CSRM identify a completion date no later than June 1, 2024) (item 2.b).

Should we learn that a water spray system is technically feasible, and important safety risks can

be mitigated, there will still be considerable effort to perform an engineering evaluation of the system to determine the installation scope and schedule for implementation. Until CSRM fully understands the scope it will not be possible to commit to a scrap water spray system for the mill or to a date for that system's implementation. Should the project proceed, CSRM will diligently seek to meet the June 1, 2024 implementation date. However, if the scope of work makes it impossible to meet that date, CSRM will propose an alternative implementation date.

Responding to these complex questions will require considerable effort and therefore, we believe that we meet both the letter and the intent of the rule, and the requested extension to March 1, 2024 to respond to DEQ's letter of January 8, 2024 is appropriate.

We appreciate your consideration of this request. Please let me know if you have any questions.

Sincerely,

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

Jim Spahr

CC: Geoff Tichenor  
John Browning, P.E.