



# Oregon

Tina Kotek, Governor

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January 29, 2024

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

*Sent via email only*

Jim Spahr,

On January 22, 2024, DEQ received a request from Cascade Steel Rolling Mills, Inc. (CSRM) for a 39-day extension of the deadline for submittal of information needed to complete a revised Cleaner Air Oregon (CAO) Emissions Inventory (Inventory). In a letter dated January 8, 2024 (the Letter), DEQ requested that CSRM provide information regarding the feasibility of water spray controls for scrap handling activities and in the event that CSRM determined that controls were not feasible, that CSRM submit a revised Inventory to DEQ, by January 22, 2024. CSRM is requesting additional time to respond to the Letter. CSRM proposes to submit a complete response to the Letter by March 1, 2024. DEQ met with CSRM on January 18, 2024, to discuss the challenges in confirming the feasibility of controls and a possible revision of the due date for responding to the Letter.

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. CSRM has demonstrated progress in responding to the Letter by coordinating visits to other scrap melting facilities that have implemented similar controls, to help evaluate whether a water spray system can be operated safely at CSRM. Further, DEQ agrees that a delay may be necessary in order for CSRM to determine feasibility due to safety considerations and, in the event controls are feasible, to develop an implementation plan in sufficient detail to respond to DEQ's Letter.

DEQ's Letter requested that CSRM identify a completion date for installation no later than June 1, 2024, in order for water spray controls to be included in the Inventory. CSRM has indicated that while they will "diligently seek" to meet this timeline, it may not be possible depending on the scope of the installation. DEQ acknowledges the uncertainty in the possible installation timeline and will evaluate whether controls may be included in the Inventory if and when CSRM proposes an installation date.

DEQ agrees to revise the due date for the information requested in the Letter; however, in order to limit potential delays in Inventory approval, DEQ requests that CSRM also submit the revised Inventory by the new due date, regardless of whether CSRM will be installing controls. Additionally, DEQ requests that CSRM arrange a meeting with DEQ to be scheduled no later than **February 26, 2024**, to discuss the outcome of the feasibility determination and, if applicable, to discuss installation timelines and a methodology for incorporating the controls into the Inventory. Please submit the information requested in the Letter, including CSRM's revised Inventory, no later than **March 1, 2024**.

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](mailto:julia.degagne@deq.oregon.gov), if you have any questions regarding the Inventory submittal requirements.

36-5034 Cascade Steel Rolling Mills, Inc.

Sincerely,

*Julia DeGagne*

Julia DeGagné  
Air Toxics Project Manager

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