



Oregon

Tina Kotek, Governor

Department of Environmental Quality
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April 5, 2024

Cascade Steel Rolling Mills, Inc.
3200 N Hwy 99W
McMinnville, OR 97128
Sent via email only

Jim Spahr,

DEQ has reviewed and **approves** the revised Cleaner Air Oregon (CAO) Emissions Inventory (Inventory) for Cascade Steel Rolling Mills, Inc. (CSRSM) in McMinnville, OR, submitted on March 1, 2024, with the following conditions:

1. CSRSM has indicated that a water spray system will be installed to control particulate emissions from metal scrap handling activities (Toxics Emissions Units EU-09sh_Main and EU-09sh_Sec) prior to the submittal of the CAO Risk Assessment. In order for this control to be included in the Risk Assessment, CSRSM must have submitted a Notice of Approval Application ([Form MD901](#)) and a Notice of Construction Completion ([Form R1004](#)) for the spray system installation prior to the Risk Assessment submittal. DEQ will work with CSRSM to determine operational requirements for the system, which will be included as needed in the Toxics Air Contaminant Permit Addendum after approval of the Risk Assessment.
2. CSRSM conducted source testing for fluorides (DEQ ID 239) and hydrogen fluoride (CASRN 7664-39-3) at the melt shop baghouse exhausts in July and August 2023, and February, 2024. Concurrent with any future CAO submittals, CSRSM must update and resubmit the Inventory to incorporate any available DEQ-approved site-specific test data for fluorides and hydrogen fluoride.
3. By **May 6, 2024**, confirm the Actual 2021 throughput for the total scrap handled, and either revise and resubmit the updated Inventory or notify in DEQ in writing that no revisions are needed. The amount reported in the Inventory (a combined 1,244,747.6 tons from main and secondary scrap handling activities) is inconsistent with the amount reported in CSRSM's 2021 Annual Report (502,562.46 tons total).

The next step in the CAO process is to submit a Modeling Protocol by no later than thirty (30) days from the date of this letter, by **May 6, 2024**. [[OAR 340-245-0030\(1\)\(b\)](#)] Modeling Protocol requirements are listed in [OAR 340-245-0210\(1\)\(a\)](#). If you plan to complete a Level 3 or 4 Risk Assessment, your Risk Assessment Work Plan (RAWP) must be submitted to DEQ by no later than ninety (90) days from the date of this letter, by **July 5, 2024**. DEQ is allowing for a 30-day extension to the 60-day deadline for this submittal based on CSRSM's request to consider any adjustments to the acute Toxicity Reference Value (TRV) for manganese proposed by DEQ following the Air Toxics Science Advisory Committee (ATSAC) meeting held on April 3, 2024, related to the required TRV update rulemaking process [[OAR 340-245-0030\(1\)\(c\)](#), [OAR 340-245-0030\(3\)\(b\)](#), and [OAR 340-247-0040](#)]. RAWP requirements can be found in [OAR 340-245-0210\(2\)](#).

Information about CAO permitting, including a flow chart showing the risk assessment process can be found on the CAO [Step-by-Step Guide for Facilities webpage](#).

36-5034 Cascade Steel Rolling Mills, Inc.

If you have any questions regarding this letter please contact me directly at (503) 866-9643 or julia.degagne@deq.oregon.gov. I look forward to your continued assistance with this process.

Sincerely,

A handwritten signature in black ink that reads "Julia DeGagné". The signature is written in a cursive, flowing style.

Julia DeGagné
Cleaner Air Oregon Program Engineer

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