

From: [Jim Spahr](#)
To: [DEGAGNE Julia * DEQ](#)
Cc: [John Browning](#); [Tichenor, Geoffrey](#); [EISELE Michael * DEQ](#); [GISKA JR * DEQ](#); [LOBOY Zach * DEQ](#)
Subject: RE: CSRM CAO Emissions Inventory Approval
Date: Wednesday, May 1, 2024 8:09:12 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Julia,

Item #3 of your EI approval letter dated April 5, 2024 asked us to confirm the Actual 2021 scrap handling rates provided in our March 1, 2024 AQ520 Inventory form. As your letter points out the scrap handling amount as reported in the 2021 Title V annual report is 502,562.46 tons whereas the amount estimated in the CAO EI Form for 2021 is 1,244,747.6 tons.

For the 2021 Title V annual report, we reported scrap handling using the methodology prescribed in Condition 41.d of our Title V permit, in which the PM emission factor is applied to “Lbs/ton scrap handled” (the mill’s total scrap throughput). By contrast, for the Inventory, in applying the drop equation, as directed by DEQ’s CAO team, we conservatively assumed that all scrap brought onto the site gets dropped twice. This assumption is the basis for the difference between the values reported in the 2021 Title V annual report and the AQ520 Inventory form.

In completing the AQ520 form we derived the 2021 scrap handling rates consistent with our Inventory approach for using the drop equation as described below.

For the Main Scrap Pile:

Multiply the 2021 steel production rate by 1.1 to account for yield and multiply by 2 or:

$444,518 \text{ tons} \times 1.1 \times 2 = 977,939.6 \text{ tons}$

For the Secondary Scrap Pile:

For this Pile our Inventory approach was to look at historical throughputs and then multiply 2. Since this approach was being used or tracked to evaluate potential drops at the secondary scrap pile in 2021 we simply estimate the rate by taking 80% of our requested PTE amount or:

$0.8 \times 333,510 \text{ tons} = 266,808 \text{ tons}$.

We don’t believe the AQ520 Form needs to be modified at this time. However, as you are aware and we discussed with your colleagues on Tuesday, we are currently undertaking a study aimed at developing better emission estimates for scrap handling. We anticipate that study will not only result in new emission factors but may alter the approach to applying stockpile activity levels to those emission factors.

Please let me know if you have any further questions.

Best Regards,
Jim
