



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
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February 8, 2023

Jim Spahr  
Cascade Steel Rolling Mills, Inc.  
3200 North Hwy 99W  
McMinnville, OR 97128  
*Sent via email only*

Re: Cleaner Air Oregon Dust Sampling and Analysis Plan  
Cascade Steel Rolling Mills, Inc.

Mr. Spahr,

On January 30, 2023, the Oregon Department of Environmental Quality (DEQ) received a Dust Sampling and Analysis Plan (SAP), prepared by Bridgewater Group on behalf of Cascade Steel Rolling Mills, Inc. (CSRМ). Based on the cover letter submitted with the SAP, we understand that CSRМ has already conducted the sampling as proposed and plans to submit those analytical results with the revised Cleaner Air Oregon Emissions Inventory (Inventory) on or before February 13<sup>th</sup>, 2023.

In the SAP, CSRМ proposes to:

1. Perform a linear sweep of fines collected along the truck sweep off area concrete border wall and collect a single grab sample for analysis.
2. Analyze collected sample for total metals per EPA Method 6020B.
3. Complete one sampling event in 2023 for the purpose of developing initial site-specific emission factors for the facility's toxic air contaminant Emissions Inventory for fugitive dust from scrap handling (EU-9).

DEQ approves the facility's SAP with the following conditions:

1. Submit the Sampling and Analysis Report to DEQ no later than February 13, 2023.
2. Incorporate results into your revised Inventory, due no later than February 13, 2023.

Regarding the composition of dust from unpaved roads, CSRМ proposes to use compositional data for the steel slag which is used to construct the unpaved roads. Because this data is already available and was previously provided to DEQ, CSRМ has not submitted a plan for sampling road dust. Based on the information currently available, DEQ accepts this proposal for determining the composition of CSRМ's unpaved road dust in the revised Inventory, and is not requiring sampling of road dust at this time.

DEQ appreciates your continued assistance with this process. If you have any questions or concerns, please contact me directly at (503) 866-9643 or [julia.degagne@deq.oregon.gov](mailto:julia.degagne@deq.oregon.gov).

Sincerely,

Julia DeGagné  
DEQ Air Toxics Project Manager

36-5034 Cascade Steel Rolling Mills, Inc.

Cc: Daniel Lee, CSRM  
John Browning, Bridgewater Group  
J.R Giska, DEQ  
Thomas Rhodes, DEQ  
Michael Eisele, DEQ  
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