



Oregon

Kate Brown, Governor

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October 3, 2022

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

Sent via email only

Daniel Lee,

On September 23, 2022, DEQ received a request from Cascade Steel Rolling Mills, Inc. (CSRSM) for an extension of the deadline for submittal of a revised Cleaner Air Oregon (CAO) Emissions Inventory (Inventory). As specified in DEQ's August 26, 2022 response letter to CSRSM's May 9, 2022 Emissions Inventory submittal, the revised Inventory is due on **October 10, 2022**. CSRSM has requested additional time to complete comprehensive source testing in order to gather data it deems necessary to respond to specific comments 1-11 of DEQ's August 26, 2022 letter. CSRSM has proposed a schedule for testing that suggests the likely earliest submittal date for the Inventory would be January, 2024.

CAO 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. To date, CSRSM has not demonstrated that specific progress has been made in responding to DEQ's comments (for example, by clearly delineating the comment responses that may require further testing from those that would not, or by requesting feedback or clarification from DEQ regarding Inventory requirements). Further, DEQ has concluded that you have not demonstrated good cause for a necessary delay in completing a revised Inventory at this time. Most of the specific comments listed in DEQ's August 26, 2022 letter can be addressed using information already submitted by CSRSM in fulfillment of Title V permit requirements and in the May 9, 2022 Inventory submittal, or using existing information, including published emission factors and methodologies. If CSRSM is unable to identify existing emissions data or other information needed to fully address any of DEQ's comments, CSRSM may propose assumptions based on the information that is available and engineering judgement. For these reasons, DEQ declines to grant the requested extension of the Inventory submittal deadline.

DEQ appreciates CSRSM's commitment to accuracy and willingness to develop a comprehensive source testing program. If you choose to collect additional data on a voluntary basis, CAO staff are available to review and approve source test plans to ensure acceptability, and the Inventory may be updated any time throughout the CAO process if more representative data become available. Although DEQ is not requiring source testing at this time, source testing requirements will be considered during the CAO permitting process to verify emission factors used in the Inventory.

The CAO program's purpose is to assess and limit public health risk from emissions of Toxic Air Contaminants (TACs) from industrial and commercial facilities. DEQ is committed to moving CSRSM through the CAO process as expeditiously as possible to ensure that this objective is achieved within a reasonable timeframe. CSRSM was designated as a priority ("Group 1") facility for CAO in 2018, based on available emissions information and the resulting potential risk to public health. Of particular concern in regards to CSRSM is the potential for acute health impacts resulting from significant emissions of metal TACs.

36-5034 Cascade Steel Rolling Mills, Inc.

DEQ remains available to meet with CSRM to discuss emissions estimation approaches or provide feedback via email. Please contact me directly at 503.866.9643 or julia.degagne@deq.oregon.gov, if you have any questions regarding extension request criteria or Inventory submittal requirements.

Sincerely,

A handwritten signature in cursive script that reads "Julia DeGagné".

Julia DeGagné
Air Toxics Project Manager

Cc: Brian Lewallen, CSRM
Stan Alpert, CSRM
Tom Wood, Stoel Rives
John Browning, Bridgewater Group
Michael Eisele, DEQ
JR Giska, DEQ
Thomas Rhodes, DEQ
Matt Davis, DEQ
Keith Anderson, DEQ
File