



Cascade Steel Rolling Mills, Inc.

3200 North Hwy 99W
McMinnville, OR 97128

A **Schnitzer**  Company

800-283-2776 - 503-472-4181 - 503-434-9843 (Fax)

September 23, 2022

Julia DeGagne
Air Toxics Project Manager
Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Sent via email only

Re: Request for Extension per OAR 340-245-0030(3)

Dear Julia:

By letter dated August 26, 2022, the Oregon Department of Environmental Quality (DEQ) requested that Cascade Steel Rolling Mills, Inc. (CSRSM) respond to questions concerning its Cleaner Air Oregon air toxics emissions inventory. CSRSM has reviewed your letter and determined that it will require an extension in order to respond to many of the requested items. This letter explains the basis for that request and proposes a schedule in compliance with OAR 340-245-0030(3).

The fundamental nature of Questions 1 through 11 of the information request are to ask CSRSM to collect additional information and fundamentally revise our emissions inventory. In order to respond to these 11 questions, it will be necessary for CSRSM to perform a comprehensive emissions testing program. We anticipate this program will include analytical testing of multiple emission sources as well as multiple flow path evaluations. Only with such an effort will CSRSM be able to effectively and comprehensively respond to your requests. CSRSM is willing to engage in this effort so that we can have the most accurate inventory reasonably achievable. We intend to prepare a testing protocol and submit it for Department approval. Once we have reached agreement as to the nature and scope of testing, we will proceed with the testing expeditiously. Upon receipt of those data, we will be able to prepare and submit the inventory. Our proposed schedule for accomplishing these tasks is summarized below:

- 1) Receive DEQ's approval of extension request
- 2) Develop conceptual source test plan, submit Request for Proposal to testing firms, receive and review bids and select firm or firms. – within 90 days of item 1.
- 3) With DEQ input finalize source test plan, identify potential infrastructure needs, prepare and submit source test plan to DEQ – within 120 days of item 2.
- 4) Receive DEQ Approval of source test plan.

- 5) Conduct source test – within 90 days of item 4, subject to the availability of source testing firms and the completion of safety and other infrastructure modifications needed to complete the testing (see item 3).
- 6) Submit source test reports to DEQ – within 60 days of item 5, subject to the availability of analytical data provided by outside laboratories.
- 7) Receive DEQ approval of test reports.
- 8) Submit revised EI to DEQ – within 90 days of item 7.

In contrast to the first 11 questions, we believe that we can provide all of the available information requested in Question 12 by the October 10, 2022, deadline identified in your letter.

We believe that this request is consistent with the criteria in OAR 340-245-0030(3). First, the request is being made no fewer than 15 days prior to the submittal deadline. Second, we are demonstrating progress in completing the submittal both by supplying those requested items that are currently available (i.e., Question 12) and by preparing the detailed schedule above for obtaining the information required to respond to Questions 1 through 11. Third, the delay is necessary, for good cause, to enable CSRSM to obtain more accurate, new data from the proposed testing program (i.e., additional analyses) as requested by the Department in Questions 1 through 11. These data are not obtainable except through the proposed testing and that testing will take the time specified above to design and perform, as well as to incorporate the results of the testing into our emissions inventory. As you indicate in your letter, the Department believes, and CSRSM concurs, that such testing will have a substantive impact on the outcomes of the submittal. Therefore, it is important that adequate time be allowed for the testing and emissions inventory revisions to occur. For these reasons, we believe that we meet the criteria for requesting an extension as stated in OAR 340-245-0030(3).

Please let me know if this proposal is satisfactory or whether there is any additional information that you require to supplement the reasoning above. We appreciate your consideration of the request.

Sincerely,



Daniel Lee

cc: Brian Lewallen
Stan Alpert
John Browning
Tom Wood