



Oregon

Tina Kotek, Governor

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May 25, 2022

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

Sent via email only

Jim Spahr,

On May 19, 2023, DEQ received a request from Cascade Steel Rolling Mills, Inc. (CSRSM) for a 46-day partial extension of the deadline for submittal of a revised Cleaner Air Oregon (CAO) Emissions Inventory (Inventory). As specified in DEQ's May 4, 2023, letter (Comment Letter), the revised Inventory is currently due on June 5, 2023. CSRSM is requesting additional time to prepare responses to Items 1.a.iii, 1.c, 1.e, and 1.g of the Comment Letter, and proposes to submit responses to all other items by the June 5, 2023, due date. DEQ met with CSRSM staff on May 17, 2023, to discuss the Inventory and a possible extension of the due date.

CSRSM also wrote that, based on our May 18, 2023, phone call, CSRSM would "continue to use the Fluorides and HF emission factors," used in the Inventory submitted on February 13, 2023. CSRSM is working to obtain site-specific data for hydrogen fluoride (HF) and fluorides through source testing in response to an Information Request from DEQ dated January 30, 2023. CSRSM has submitted a source test plan to DEQ and is required to complete this testing by June 26, 2023. Based on the expectations that this data will be available within the next several months and that CSRSM will incorporate it into the Inventory at that time, DEQ is amending its May 4, 2023, Comment Letter to remove item 1.a.ii (regarding updates to fluoride emission factors). However, since CSRSM did not include HF, which is a Toxic Air Contaminant (TAC), in its February 13, 2023 Inventory, DEQ will require that HF emissions still be included separately from fluorides, as specified in Item 1.a.i. of the Comment Letter.

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. Based on our communications on May 17 and May 18, 2023, CSRSM has demonstrated progress in responding to the Comment Letter by gathering additional information about raw materials handling and reviewing scrap handling processes in order to develop accurate emissions estimates for these activities, and additional time is needed to finalize these estimates. However, DEQ remains committed to completing the CAO process expeditiously and believes that 60 days from the May 4, 2023, Comment Letter should be sufficient time for CSRSM to respond to Items 1.a.i, 1.a.iii, 1.c, 1.e., and 1.g. For these reasons, DEQ partially approves CSRSM's request but will grant only a 28-day extension from the original submittal deadline of June 5, 2023. Although CSRSM has not requested an extension for all of the items in the Comment Letter, DEQ is extending the due date for the entire Comment Letter so that CSRSM can submit a complete Inventory. CSRSM's revised Inventory and full response to the May 4, 2023, Comment Letter must be submitted by no later than **July 3, 2023**.

36-5034 Cascade Steel Rolling Mills, Inc.

DEQ remains available to meet with CSRM 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 this extension or the Inventory submittal requirements.

Sincerely,

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

Julia DeGagné
Air Toxics Project Manager

Cc: Daniel Lee, CSRM
Tim Sturdavant, CSRM
Stan Alpert, CSRM
Jason Young, CSRM
John Browning, Bridgewater Group
Tom Wood, Stoel Rives
Michael Eisele, DEQ
J.R. Giska, DEQ
File