

**From:** [Jim Spahr](#)  
**To:** [DEGAGNE Julia \\* DEQ](#)  
**Cc:** ["John Browning"](#); [Daniel Lee](#); [Tim Sturdavant](#); [Thomas Wood](#); [Stan Alpert](#)  
**Subject:** RE: Cleaner Air Oregon Emissions Inventory - DEQ response  
**Date:** Friday, May 19, 2023 10:57:46 AM  
**Attachments:** [image001.png](#)

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Hi Julia,

Thank you for taking the time to meet with us to discuss your May 4 response to CSRM's February 13 CAO Emissions Inventory submittal as well as your follow-up call specific to section 1.a of the request. As discussed on the call, CSRM is requesting an extension to the June 5 deadline for our response to some of the requests in your letter.

Based on your May 18 phone call, we understand that no further action is required on section 1.a.i and 1.a.ii. You indicated that we could continue to use the Fluorides and HF emission factors in the latest version of our inventory until such time as on-site testing data are available later this summer.

CSRM will provide a response to sections 1,b, 1.d., 1.f, 2.a., 2.b., and 2.c. by the original June 5 deadline in your letter.

In regard to sections 1.a.iii, 1.c, 1.e, and 1.g, CSRM is requesting an extension until July 21 to prepare and submit our response. OAR 340-245-0030(3) authorizes DEQ to grant an extension to a deadline associated with an information request where (a) the owner has demonstrated progress in completing the submittal and (b) a delay is necessary to obtaining more accurate or new data, perform additional analyses, or address changes in operations or other key parameters, any of which are likely to have a substantive impact on the outcomes of the submittal. We believe that we meet the first criterion as we are clearly demonstrating progress by providing those elements that are more readily addressed as soon as possible. We believe that we meet the second criterion based on the additional time needed to accurately prepare responses to these more complex questions. These questions require considerable effort and both CSRM and its outside consultants have other obligations (e.g., TRI filing) that prevent us from placing our undivided attention on these responses. These sections address important parts of our inventory that are critical to get right and that demand a significant amount of effort. Therefore, we believe that we meet both the letter and the intent of the rule, and the requested extension is appropriate.

We appreciate your consideration of this request. Please let me know if you have any questions.

Best Regards,  
Jim

**Jim Spahr**

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**From:** DEGAGNE Julia \* DEQ <Julia.DEGAGNE@deq.oregon.gov>  
**Sent:** Thursday, May 4, 2023 11:14 AM  
**To:** Jim Spahr <jspahr@schn.com>  
**Cc:** 'John Browning' <jbrowning@bridgeh2o.com>; Daniel Lee <dlee@schn.com>; Tim Sturdavant <tsturdavant@schn.com>; Thomas Wood <tom.wood@stoel.com>; Stan Alpert <salpert@schn.com>; GISKA JR \* DEQ <JR.GISKA@deq.oregon.gov>; EISELE Michael \* DEQ <Michael.EISELE@deq.oregon.gov>; ANDERSEN Keith \* DEQ <Keith.ANDERSEN@deq.oregon.gov>  
**Subject:** [EXTERNAL] Cleaner Air Oregon Emissions Inventory - DEQ response

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Hello Jim,

Please find attached DEQ's response to Cascade Steel's February 13, 2023 CAO Emissions Inventory submittal, requesting additional information and revisions to the Inventory. If you have any questions, please let me know.

Thank you,



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