



# Oregon

Kate Brown, Governor

Department of Environmental Quality  
Agency Headquarters  
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September 4, 2019

Permit: 34-9507-SI-01

Mr. Bryan Boynton, Safety & Health Manager  
Genentech, Inc.  
4625 NW Brookwood Parkway  
Hillsboro, OR 97124

Dear Mr. Boynton:

DEQ has completed its review and approves the Cleaner Air Oregon (CAO) Emissions Inventory Form AQ405, Modeling Protocol, and Level 1 Risk Assessment submitted by Genentech, Inc. (Source Number: 34-9507) in accordance with [OAR 340-245-0050(2)], received on August 23<sup>rd</sup>, 2019. Our approval includes the following comments:

1. In the natural gas risk assessment calculations for Boilers 3-5, Genentech incorrectly used the 10 meter dispersion factor for "Exposure location Distance >1000m" instead of the 5 meter value of 0.000022 ( $\mu\text{g}/\text{m}^3$ )/(lb/d). This does not significantly affect the calculated risk, therefore, DEQ is not requesting an updated assessment.
2. For risk associated with polycyclic aromatic hydrocarbon (PAH) emissions from diesel combustion, DEQ requires using the South Coast Air Quality Management District (SCAQMD) emission factors for aggregate "PAH (excluding naphthalene)" emissions in lieu of source-specific data, which was done here. The associated RBC values for PAH emissions do not include the noncancer risk for benzo[a]pyrene. In order to calculate risk from all PAHs, DEQ has estimated the noncancer risk from benzo[a]pyrene separately using the AP-42 emission factor for benzo[a]pyrene provided in Table 3.4-4 and determined it does not contribute at levels that affect the outcome of this risk assessment. Therefore, in this case DEQ is not requesting an updated assessment.

Notwithstanding the above comments, DEQ concludes that the CAO Emissions Inventory, Modeling Protocol, and Level 1 Risk Assessment submitted by Genentech, Inc. are complete and satisfy the CAO requirements for performing a risk assessment pursuant to [OAR 340-245-0050]. The Acute Hazard Index (HI) risk of 0.73, rounded to 1.0, as determined by the Level 1 Risk Assessment for this facility is above the Source Permit Level, and will require toxic air contaminant permit conditions in accordance with [OAR 340-245-0100(1)(b)(B)(iii) and 340-245-0100(4)(d)].

The next step in the CAO process is to complete the Cleaner Air Oregon Permit Application Form AQ106CAO (<https://www.oregon.gov/deq/FilterPermitsDocs/aqp106CAOapp.pdf>). Because your facility has been determined to be a "new" source and demonstrates risk above the Source Permit Level you are required to submit payment for the "Level 1 Risk Assessment – not de minimis" Simple ACDP Specific Activity Fee of \$1,500. The application form and fee must be received prior to submittal of a completed ACDP Permit application.

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DEQ will notify you of our acceptance and approval once the above forms and fees have been received. Please contact Josh Alexander at (503.229.6035, [alexander.joshua@deq.state.or.us](mailto:alexander.joshua@deq.state.or.us)) if you have any questions. We look forward to your continued assistance with this process.

Sincerely,



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