



Oregon

Kate Brown, Governor

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Ms. Glass,

DEQ called Hydro in to the Cleaner Air Oregon (CAO) program on October 15, 2020. On December 23, 2020, Hydro requested that DEQ grant a 75-day extension to the submittal deadline for their Emissions Inventory (Inventory). Hydro cited the following reasons for requesting an extension:

1. Hydro has experienced turnover in its environmental and operations staff. While new staff are committed to quickly coming up to speed with facility operations and know-how as well as CAO regulations, this turnover has impacted the ability of Hydro to gather the necessary data needed for the development of an accurate emission inventory.
2. Like other facilities across the country, Hydro has been working hard to stay operational during the COVID-19 pandemic. Meeting production demands during the pandemic continues to present a challenge due to a limitation in resources and changing guidance and regulations. In addition, the pandemic also impacts Hydro's ability to maintain consistency in production schedules which reflect normal operations. The Health, Safety & Environmental Management team remains focused on the implementation and maintenance of COVID protocols to ensure the safety of our staff, families, and community.
3. In order to support its participation in CAO, Hydro has recognized the need to work with environmental consultants over the past year. Hydro recently transitioned support to Maul Foster & Alongi (MFA) who has extensive experience in the CAO program and in the coatings industry as well as prior experience working with Hydro. As a result, MFA continues to evaluate the extensive work performed to date, as outlined below, but may need to perform additional analyses to assist Hydro in, among other things, finalizing its emissions inventory. To date, MFA has conducted a site visit with facility personnel at the facility to help familiarize MFA with the facility. MFA is currently refining the PFDs of the potential TEUs at the facility to supplement the CAO emissions inventory. MFA is also currently reviewing production data records for 2019 and is working with Hydro to determine the maximum production scenario. The input production and process rates will serve as the basis for calculating toxic air contaminant (TAC) emission estimates in the CAO emissions inventory for each TEU at the facility.

A supplement to the extension request was submitted by Hydro on January 8, 2021 detailing the following items that require additional effort to complete an accurate emissions inventory. These included:

- Coating lines - Incorporate factors for overspray and filtration for solids from the coating lines.

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- Horizontal pre-treat - Develop an evaporative emission calculation method instead of the previously used mass balance-only approach.
- Wastewater treatment - Develop a more refined emissions model, possibly using Water9 or ToxChem, for the wastewater treatment system instead of using a mass balance-only approach.
- Coating products - MFA identified discrepancies and data gaps primarily related to TAC constituents in the facility coatings database as compared to the manufacturers' SDS. Historically, non-HAP constituents were not added to the facility databases. MFA has advised Hydro that all TACs need to be included in the CAO process. As a result, Hydro approved MFA's request to initiate a complete review of facility SDS data for over 500 products to ensure all TACs are accounted for in the emissions inventory.
- PTE calculations - MFA has proposed developing a toxicity weighted emission rate ranking system based on SDS data for the coating lines that will allow Hydro and MFA to identify a reasonable worst-case PTE production scenario on a risk-basis. This method will help ensure the ensuing risk assessment is based on realistic worst-case emissions and is necessary for subsequent permitting to ensure that permit limits are not inadvertently exceeded in the future.

Hydro also revised the initial extension request with a tiered extension request:

1. Submit Inventory data for materials related to the following TEUs: Wastewater, TIE process, Horizontal Pretreat, and Natural Gas combustion within fourteen (14) days from the Original Submission Date; and
2. Submit the full Inventory within forty-five (45) from the Original Submission Date.

DEQ approves a 30 day extension for submittal of the Inventory with the presumption that Hydro will communicate any questions or clarifications proactively in order to provide timely and complete submittals. The Inventory shall be submitted no later than February 12, 2021. It is DEQ's expectation that issues affecting Hydro's ability to meet future submittal timelines will be communicated proactively, as completing your facility's risk assessment is a priority for the CAO program and the neighboring community.

Please contact me directly (503.229.5534, rhodes.thomas@deq.state.or.us) with any questions or concerns. We look forward to your continued assistance with this process.

Sincerely,

Thomas Rhodes

Thomas Rhodes

Cleaner Air Oregon Source Test Coordinator

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