



January 8, 2020

Via Electronic Mail (Kenzie.Billings@state.or.us)

Ms. Kenzie Billings, P.E.
Air Toxics Project Manager
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Re: Supplement to Initial Extension Request for Submittal of CAO Emissions Inventory

Dear Ms. Billings:

Hydro Extrusion Portland, Inc. (Hydro) received written notice from Oregon Department of Environmental Quality (DEQ) on October 15, 2020 that the facility located at 5325 NE Skyport Way in Portland, Oregon was being called in to the Cleaner Air Oregon (CAO) program. Accordingly, the CAO Emissions Inventory Form (AQ405CAO) is due no later than January 13, 2021 (Original Submission Date). On December 23, 2020, Hydro timely submitted an initial request for an extension to the emissions inventory submission deadline. Please allow this letter to provide additional detail and clarifications to its initial extension request.

Hydro has been actively working on meeting the regulatory deadlines including completion of its CAO Emission Inventory as required by OAR 340-245-003(1)(a). As discussed during our technical meeting on October 21, 2021 (October Meeting), Hydro has preliminarily identified its toxic emissions units (TEU) in relation to the process flow diagrams (PFD). In addition, Hydro has been diligently working to develop the risk model assumptions also discussed during our October Meeting. Unfortunately, due to certain circumstances including those beyond its control, as discussed below, Hydro is requesting additional time to submit a complete CAO emissions inventory consistent with OAR 340-245-0030(3).

To support its participation in CAO, Hydro has worked with environmental consultants over the past year. Hydro transitioned consultancy support to Maul Foster & Alongi (MFA) on December 23, 2020 to utilize their experience in the CAO program and in the coatings industry as well as their prior experience working with Hydro. Our initial work to develop an emissions inventory was primarily focused on emissions of individual TACs calculated using AP-42 emission factors, and basic mass balance calculations for individual emission units. In discussing our emissions inventory approach with MFA, we realized we needed a different approach to get to an accurate and realistic emissions inventory. We hope you can appreciate that this transition in consultant support is being made to develop a more accurate and complete end product for DEQ that better represents actual and potential emissions from our facility.

After conducting a site visit with facility personnel, MFA began evaluating the work performed to date and began to perform additional analyses to assist Hydro in, among other things, improving and finalizing its emissions inventory. Facility PFDs of the potential TEUs at the facility are also being updated by MFA to supplement the CAO emissions inventory. As a result of reviewing the previously developed emissions inventory, MFA identified the following items that require additional effort to be complete and accurate.

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

MFA is currently reviewing production data and raw material usage 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. MFA is also in the process of implementing the changes and updates listed previously. It is important to note that there may be additional updates and changes identified by MFA as they proceed with the emissions inventory. The list provided represents our best understanding of the path forward at the time of this letter.

Hydro has experienced turnover in its environmental and operations staff over the past 12 months. 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 efficiently gather the necessary data needed for the development of an accurate emission inventory. This is in part due to the loss of institutional and historical knowledge resulting from staff turnover.

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. That said, the time necessarily dedicated by Hydro staff to implementing these COVID protocols has limited the amount of time available for staff to assist with information gathering for the CAO program.

Hydro feels that we have demonstrated progress in completing the submittal according to OAR 340-245-0030(3)(a) based on the details provided above. Hydro also feels that an extension is needed for good cause, according to OAR 340-245-0030(3)(b) including obtaining more accurate or new data (e.g. updates

to the SDS database to incorporate TACs) and performing additional analyses (e.g. toxicity weighted ranking, wastewater emissions calculations), among other items, which will have a substantive impact on the outcome of the emissions inventory.

Hydro has been making every effort to meet the Original Submission Date. We remain committed to using as much site-specific information as possible to develop the most accurate and representative CAO emissions inventory possible. Given the difficulties addressed above, we are requesting DEQ grant Hydro additional time to complete and submit our full CAO emissions inventory. To this end and in lieu of the timeframe requested in its initial extension request, Hydro has come up with a tiered extension request as follows:

- (i) Hydro to submit emissions 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
- (ii) Hydro to submit the full emissions inventory within forty-five (45) days from the Original Submission Date.

We look forward to working with you and your colleagues at DEQ throughout the CAO permitting process. Thank you for your consideration of this extension request.

Sincerely,
Hydro Extrusion Portland, Inc.

Ruth Glass
HSE Manager

cc: Chad Darby, MFA
Brian Eagle, MFA
Leslie Riley, MFA