



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
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May 21, 2021

Jennifer Garcia
Hydro Extrusion Portland, Inc.
5325 NE Skyport Way
Portland, OR 97218

Ms. Garcia,

The Oregon Department of Environmental Quality (DEQ) received the Cleaner Air Oregon (CAO) Air Toxics Emissions Inventory Form AQ405CAO (Inventory) and supporting information dated February 17, 2021, submitted by Hydro Extrusion Portland, Inc. (Hydro) in Portland, OR as part of the Cleaner Air Oregon (CAO) program. Following receipt of the Emissions Inventory, DEQ met with Hydro to discuss submitted materials on March 10, 2021 and May 4, 2021. Based on our review, DEQ requests additional information, corrections and updates to the Inventory, in accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), by June 21, 2021.

Comments

1. Many of the Safety Data Sheets (SDSs) contained conflicting composition ranges in Section 3 and Section 15. Please provide information from the manufacturer as to which section of the SDS contains the correct composition range or use the range that has a higher average value and revise the Inventory.
2. Naphtha is listed as a solvent in many of the SDSs. Please revise the Inventory to include reportable TACs from naphtha or provide information from the manufacturer that those TACs are already accounted for in the SDSs.
3. Ethene, 1,1-difluoro-, homopolymer (polyvinylidene fluoride or PVDF) is listed in most of the SDSs. Ethene, 1,1-difluoro-, homopolymer is a reportable TAC as a perfluorinated compound (PFC). Please revise the Inventory to include ethene, 1,1-difluoro-, homopolymer emissions as a PFC.
4. Not all of the metals in the coatings are accounted for in the Inventory:
 - a. Please revise the Inventory to include zinc from the use of cadmium zinc sulfide yellow. Report zinc emissions as *zinc and compounds* under CAS Number 7440-66-6; and
 - b. The SDSs for pigments used onsite appear to contain additional metals that are not listed in the Inventory. Please revise the Inventory to include those additional metals, or provide written confirmation from the manufacturer that those metals are present only in trace amounts.
5. PTE emissions assume a capture efficiency of 100% based on facility improvements. Source testing with EPA Method 204 will be required to demonstrate the 100% capture efficiency. Source testing must be completed by July 21, 2021. Alternatively, the facility may use the 92% capture efficiency per the current permit for PTE emissions.

Confidential or trade secret information submitted to DEQ

DEQ is requesting that you submit the above additional information to complete your Toxic Air Contaminant Emissions Inventory. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in OAR

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340-214-0130 to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

Submittal Deadlines

Please communicate any questions or clarifications regarding the above comments proactively in order to provide timely submittals. Your submittal due dates are summarized below:

1. Submit the revised emissions inventory by June 21, 2021.
2. Conduct source testing to verify 100% capture efficiency by July 21, 2021. The source test plan is due to DEQ 30 days before the test; the source test results are due to DEQ 30 days after completing the test.

DEQ remains available during this timeframe to discuss the submittal with you and answer any questions you may have. Failure to provide additional information or corrections required by DEQ by this date may result in a violation of OAR 340-245-0030(1) and OAR 340-245-0040(1).

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

Sincerely,

Thomas Rhodes

Thomas Rhodes
DEQ CAO Source Test Coordinator

Cc: Jeremy Basler, Hydro
Paul Schultz, Hydro
Leslie Riley, MFA
Keith Johnson, DEQ
Kenzie Billings, DEQ
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