



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
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July 22, 2021

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

Ms. Garcia,

DEQ has reviewed the source test plan submitted by Hydro Extrusion Portland, Inc. (Hydro) on July 16, 2021. Based on this review, DEQ requires that the following issues be addressed in a revised source test plan. A revised source test plan is due at least 15 days prior to the planned testing, which is currently scheduled to occur August 13, 2021.

Specific Revision Comments

1. Cover page. Please revise the Submittal "To" address to:
700 NE Multnomah St., Suite 600
Portland, OR 97232
2. Page 9, Section 3.0. Please revise Sampling Procedures to include the following:
 - a. Facial velocity (FV) will be determined by the alternative criteria in Section 8.3 of the Method by measuring the pressure drop. A pressure drop of 0.007 inches of water corresponds to an FV of 200 feet per minute.
 - b. Measurements will be recorded in a series of three rounds; during each round, five measurements will be recorded at each natural draft opening (NDO).
 - c. Video recordings or photographs with date and time stamp will be used to document inward direction of flow no more than every ten minutes at all NDO locations.
3. Page 10, Section 4.0. Please revise the Quality Assurance section to include calibration certificate for the digital manometer demonstrating accuracy to differential pressures as low as 0.01 inches of water.

These testing results will provide valuable information for completing the risk assessment. If you have any questions or concerns please contact me directly. Thank you for your continued efforts with this process.

Sincerely,

Thomas Rhodes

Thomas Rhodes
DEQ CAO Source Test Coordinator

Cc: Jeremy Basler, Hydro
Peter Becker, Montrose Air Quality Services
Keith Johnson, DEQ
J.R. Giska, DEQ
Weston Li, DEQ
File

26-3241 Hydro Extrusion Portland, Inc.