

December 23, 2020

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

Re: 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. For the reasons described below, Hydro is requesting an extension to the emissions inventory submission deadline.

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 340-245-003(3).

- 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.
- 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.
- 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.

Hydro has been making every effort to meet the original CAO emissions inventory submittal due date of January 13, 2021. We remain committed to using the site-specific information to develop the most accurate CAO emissions inventory possible. Given the difficulties addressed above, we are requesting DEQ grant Hydro an additional 75 days to complete and submit our CAO emissions inventory.

We look forward to working with you and your colleagues at DEQ throughout the CAO permitting process. Thank you.

Sincerely,
Hydro Extrusion Portland, Inc.

Ruth Glass
HSE Manager

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