

March 22, 2022

Via Electronic

Thomas Rhodes (thomas.rhodes@deq.oregon.gov) Source Test Coordinator Oregon Department of Environmental Quality 700 NE Multnomah Street, Suite 600 Portland, OR 97232

Re: Form AQ523 - Categorically Exempt Toxics Emissions Units

Dear Mr. Rhodes:

Hydro Extrusion Portland, Inc. (Hydro) submitted a Cleaner Air Oregon Toxic Air Contaminant emissions inventory (emissions inventory) to the Oregon Department of Environmental Quality (DEQ) on March 19, 2021. In response to the DEQ's June 21, 2021 letter, Hydro submitted an updated emissions inventory on July 6, 2021 and the Method 204 verification test report was submitted September 10, 2021. The DEQ requested additional information and updates to the emissions inventory on December 10, 2021 and a revised emissions inventory was submitted February 10, 2022.

On March 1, 2022 the DEQ requested via email, the completion of Form AQ523 Categorically Exempt Toxics Emission Units (CETEUs) and supplied draft guidance and thresholds titled "Reporting Updates for Categorically Exempt TEUs" (draft guidance). Attached is Form AQ523 completed using the draft guidance and the list of CETEUs in OAR 340-245-0060(3)(b). Hydro has completed Form AQ523 to the best of our knowledge and based on our understanding of the draft guidance and the list of CETEUs in OAR 340-245-0060(3)(b). It is possible that Hydro may discover additional exempt TEUs. As such, Hydro reserves the right to submit a revised Form AQ523.

Please contact me if you have any questions regarding the information in the attached Form AQ523. We look forward to receiving DEQ's approval of the revised emissions inventory submitted February 10, 2022.

Thank you.

Jennifer Garcia

Sr. Environmental Engineer Hydro Extrusion Portland, Inc.



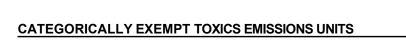
cc: Jeremy Basler (Hydro)

Leslie Riley (MFA) Keith Johnson (DEQ) Kenzie Billings (DEQ) J.R. Giska (DEQ)

Julia Degagne (DEQ)

List of Attachments:

AQ523-Categorically Exempt Toxics Emissions Units



Form AQ523 ANSWER SHEET



Facility name:	Permit Number:	

Indicate which of the following categorically exempt activities occur at this facility by checking the appropriate columns below. Submit this form electronically with your Cleaner Air Oregon (CAO) Emissions Inventory AQ520 form to meet the reporting requirements in OAR 340-245-0040(4)(a)(A) for categorically exempt Toxics Emissions Units (TEUs). This form is the complete list of categorically exempt TEUs, which can be found in the division 245 rules under OAR 340-245-0060(3)(b).

Yes	No	Categorically Exempt TEU Activities
		Evaporative and tail pipe emissions from on-site motor vehicle operation.
		Distillate oil, kerosene, gasoline, natural gas or propane burning equipment, provided the aggregate expected actual emissions of the equipment identified does not exceed the de minimis level for any regulated pollutant, based on the expected maximum annual operation of the equipment. If a source's expected emissions from all such equipment exceed the de minimis levels, then the source may identify a subgroup of such equipment as categorically exempt with the remainder not designated as an exempt TEU. The following equipment may never be included as part of the exempt TEU:
		A. Any individual distillate oil, kerosene or gasoline burning equipment with a rating greater than 0.4 million Btu/hour; and
		B. Any individual natural gas or propane burning equipment with a rating greater than 2.0 million Btu/hour.
		Distillate oil, kerosene, gasoline, natural gas or propane burning equipment brought on site for six months or less for maintenance, construction or similar purposes, such as but not limited to generators, pumps, hot water pressure washers and space heaters, provided that any such equipment that performs the same function as the permanent equipment, must be operated within the source's existing PSEL.
		Office activities.
		Food service activities.
		Janitorial activities.
		Personal care activities.
		Grounds keeping activities, including, but not limited to building painting and road and parking lot maintenance.
		On-site laundry activities.
		On-site recreation facilities.
		Instrument calibration.
		Automotive storage garages.

	Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems.
	Temporary construction activities.
	Warehouse activities.
	Accidental fires and fire suppression.
	Air vents from compressors.
	Air purification systems.
	Continuous emissions monitoring lines.
	Demineralized water tanks.
	Pre-treatment of municipal water, including use of deionized water purification systems.
	Electrical charging stations.
	Fire brigade training.
	Instrument air dryers and distribution.
	Fully enclosed process raw water filtration systems.
	Electric motors.
	Pressurized tanks containing gaseous compounds that do not contain toxic air contaminants.
	Vacuum sheet stacker vents.
	Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities.
	Log ponds.
	Stormwater settling basins.
	Paved roads and paved parking lots within an urban growth boundary.
	Hazardous air pollutant emissions in fugitive dust from paved and unpaved roads except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils.
	Health, safety, and emergency response activities.
	Non-diesel, compression ignition emergency generators and pumps used only during loss of primary equipment or utility service due to circumstances beyond the

	reasonable control of the owner or operator, or to address a power emergency, provided that the aggregate horsepower rating of all stationary emergency generator and pump engines is not more than 3,000 horsepower. If the aggregate horsepower rating of all the stationary emergency generator and pump engines is more than 3,000 horsepower, then no emergency generators and pumps at the source may be considered categorically exempt.
	Non-contact steam vents and leaks and safety and relief valves for boiler steam distribution systems.
	Non-contact steam condensate flash tanks.
	Non-contact steam vents on condensate receivers, deaerators and similar equipment.
	Boiler blowdown tanks.
	Ash piles maintained in a wetted condition and associated handling systems and activities.