



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DEQ requested via email, the completion of Form AQ523 Categorically Exempt Toxics Emission Units (CETEUs) and supplied draft guidance and thresholds titled "*Reporting Updates for Categorically Exempt TEUs*" (draft guidance). Attached is Form AQ523 completed using the draft guidance and the list of CETEUs in OAR 340-245-0060(3)(b). Hydro has completed Form AQ523 to the best of our knowledge and based on our understanding of the draft guidance and the list of CETEUs in OAR 340-245-0060(3)(b).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,

A handwritten signature in black ink, appearing to read "Jennifer Garcia", with a long horizontal flourish extending to the right.

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



State of Oregon
Department of
Environmental
Quality

CATEGORICALLY EXEMPT TOXICS EMISSIONS UNITS

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
<input type="checkbox"/>	<input type="checkbox"/>	Evaporative and tail pipe emissions from on-site motor vehicle operation.
<input type="checkbox"/>	<input type="checkbox"/>	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.
<input type="checkbox"/>	<input type="checkbox"/>	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.
<input type="checkbox"/>	<input type="checkbox"/>	Office activities.
<input type="checkbox"/>	<input type="checkbox"/>	Food service activities.
<input type="checkbox"/>	<input type="checkbox"/>	Janitorial activities.
<input type="checkbox"/>	<input type="checkbox"/>	Personal care activities.
<input type="checkbox"/>	<input type="checkbox"/>	Grounds keeping activities, including, but not limited to building painting and road and parking lot maintenance.
<input type="checkbox"/>	<input type="checkbox"/>	On-site laundry activities.
<input type="checkbox"/>	<input type="checkbox"/>	On-site recreation facilities.
<input type="checkbox"/>	<input type="checkbox"/>	Instrument calibration.
<input type="checkbox"/>	<input type="checkbox"/>	Automotive storage garages.

<input type="checkbox"/>	<input type="checkbox"/>	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.
<input type="checkbox"/>	<input type="checkbox"/>	Temporary construction activities.
<input type="checkbox"/>	<input type="checkbox"/>	Warehouse activities.
<input type="checkbox"/>	<input type="checkbox"/>	Accidental fires and fire suppression.
<input type="checkbox"/>	<input type="checkbox"/>	Air vents from compressors.
<input type="checkbox"/>	<input type="checkbox"/>	Air purification systems.
<input type="checkbox"/>	<input type="checkbox"/>	Continuous emissions monitoring lines.
<input type="checkbox"/>	<input type="checkbox"/>	Demineralized water tanks.
<input type="checkbox"/>	<input type="checkbox"/>	Pre-treatment of municipal water, including use of deionized water purification systems.
<input type="checkbox"/>	<input type="checkbox"/>	Electrical charging stations.
<input type="checkbox"/>	<input type="checkbox"/>	Fire brigade training.
<input type="checkbox"/>	<input type="checkbox"/>	Instrument air dryers and distribution.
<input type="checkbox"/>	<input type="checkbox"/>	Fully enclosed process raw water filtration systems.
<input type="checkbox"/>	<input type="checkbox"/>	Electric motors.
<input type="checkbox"/>	<input type="checkbox"/>	Pressurized tanks containing gaseous compounds that do not contain toxic air contaminants.
<input type="checkbox"/>	<input type="checkbox"/>	Vacuum sheet stacker vents.
<input type="checkbox"/>	<input type="checkbox"/>	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.
<input type="checkbox"/>	<input type="checkbox"/>	Log ponds.
<input type="checkbox"/>	<input type="checkbox"/>	Stormwater settling basins.
<input type="checkbox"/>	<input type="checkbox"/>	Paved roads and paved parking lots within an urban growth boundary.
<input type="checkbox"/>	<input type="checkbox"/>	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.
<input type="checkbox"/>	<input type="checkbox"/>	Health, safety, and emergency response activities.
<input type="checkbox"/>	<input type="checkbox"/>	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.
<input type="checkbox"/>	<input type="checkbox"/>	Non-contact steam vents and leaks and safety and relief valves for boiler steam distribution systems.
<input type="checkbox"/>	<input type="checkbox"/>	Non-contact steam condensate flash tanks.
<input type="checkbox"/>	<input type="checkbox"/>	Non-contact steam vents on condensate receivers, deaerators and similar equipment.
<input type="checkbox"/>	<input type="checkbox"/>	Boiler blowdown tanks.
<input type="checkbox"/>	<input type="checkbox"/>	Ash piles maintained in a wetted condition and associated handling systems and activities.