



December 15, 2021

Via Electronic

Thomas Rhodes (rhodes.thomas@deq.state.or.us)

CAO Source Test Coordinator

Oregon Department of Environmental Quality

700 NE Multnomah Street, Suite 600

Portland, OR 97232

Re: Extension Request for Revised CAO Emissions Inventory

Dear Mr. Rhodes:

Hydro Extrusion Portland, Inc. (Hydro) is in receipt of your letter dated December 10, 2021 requesting additional corrections and updates to Hydro's Cleaner Air Oregon (CAO) Toxic Air Contaminant (TAC) emissions inventory (emissions inventory). Your letter requests Hydro submit additional corrections and updates by January 10, 2022. Hydro requests a 30-day extension of time to February 9, 2022 to submit an updated emissions inventory. For the reasons set forth below, Hydro believes this short extension is justified and will not result in any significant delays.

Hydro initially submitted its emissions inventory to the Oregon Department of Environmental Quality (DEQ) on March 19, 2021. In response to 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. On November 24, 2021, a Memorandum to File was issued to Weston Li indicating acceptance of the Method 204 verification testing concluding the Vertical Paint Line and Paint Room meet the criteria for Permanent Total Enclosure. In the December 10, 2021 letter, DEQ is requesting additional corrections and updates to the emissions inventory.

Hydro has been working diligently to navigate the CAO program and address DEQ's requests as received. A summary of Hydro's progress on each of the additional revision requests, shown in italics, is included below:

- 1. Please revise the Inventory to include PVDF emissions from all coatings that contain this chemical.***

Hydro is in the process of reviewing safety data sheets (SDS) for each coating and will incorporate any PVDF entries that were missed in the prior submission into the emission calculations.

- 2. Please revise the Inventory to include trimethylbenzene as one of the three isomers for all coatings that contain trimethylbenzene but that do not specify an isomer.***

Hydro is reviewing SDSs for each coating. Several SDSs include trimethylbenzene (CAS 25551-13-7), as well as one or more of the isomers. Hydro would like to discuss this request with DEQ to ensure it is appropriately addressed in the updated emissions inventory.

- 3. *Revise the “Requested PTE” to include all TACs that will be emitted from coatings that will be used at the facility, not just TACs emitted for the worst-case or topped ranked toxicity-weighted coatings.***

Hydro would like to discuss this request with DEQ and come to an agreement on how to best approach the development of annual emissions that includes all TACs. Hydro will need additional time to update the emissions inventory after reaching agreement on the approach.

Hydro would like to meet with DEQ and our consultants to review the requests as noted above, prior to revising and re-submitting the emissions inventory. Given the difficulty coordinating schedules through the holiday season, and to ensure all parties are available, Hydro would like to request a meeting with DEQ the week of January 3, 2022. Following the meeting, Hydro and our consultants will need adequate time to incorporate agreed upon changes to the emissions inventory. As such, Hydro is requesting a 30-day extension to February 9, 2022 to complete any corrections and updates to the emissions inventory.

We appreciate DEQ’s consideration of this extension request and look forward to your availability the week of January 3 for a meeting.

Thank you,



Jennifer Garcia
Regional Environmental Engineer - West
Hydro Extrusion Portland, Inc.

cc: Leslie Riley (MFA)
Jeremy Basler (Hydro)
Keith Johnson (DEQ)
Kenzie Billings (DEQ)
J.R. Giska (DEQ)