



Oregon

Kate Brown, Governor

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December 10, 2021

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

Ms. Garcia,

DEQ received the submittal of the revised Cleaner Air Oregon (CAO) Emissions Inventory (Inventory) for the Hydro Extrusion Portland, Inc. (Hydro) in Portland, OR on July 6, 2021 and has completed an initial review.

In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ has determined that the following corrections and updates are required by **January 10, 2022** in order to approve the Inventory:

Specific Comments

1. Ethene, 1,1-difluoro-, homopolymer (polyvinylidene fluoride or PVDF) was not included in the Inventory as a perfluorinated compound (PFC, DEQ ID 489) for all coatings that contain PVDF. 340-245-0040(1) states "These emissions inventories must include all toxic air contaminants emitted by the source listed in OAR 340-247-8010 Table 1." Please revise the Inventory to include PVDF emissions from all coatings that contain this chemical.
2. Trimethylbenzene may exist as one of three different isomers, or as a mixture of all three, in materials: 1,2,3-, 1,2,4-, or 1,3,5-trimethylbenzene (CAS No.'s 526-73-8, 95-63-6, and 108-67-8, respectively). Trimethylbenzene was removed from the revised Inventory for coatings that did not specify the specific isomer in their SDS. All three isomers have the same Risk-Based Concentration (RBC). Please revise the Inventory to include trimethylbenzene as one of the three isomers for all coatings that contain trimethylbenzene but that do not specify the isomer.
3. The "Requested PTE" only lists the TACs emitted from the worst-case or topped ranked toxicity-weighted coatings. 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.

DEQ remains available to discuss the requested revisions with you and answer any questions you may have. Failure to provide additional information or corrections required by DEQ by the deadline above may result in a violation of OAR 340-245-0030(1).

Please contact me directly at 503-229-5534 or rhodes.thomas@deq.state.or.us with any questions. I look forward to your continued assistance with this process.

Sincerely,

Thomas Rhodes

Thomas Rhodes

26-3241 Hydro Extrusion Portland, Inc.

DEQ CAO Source Test Coordinator

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