



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Partial Compliance Evaluations

Norsk Hydro, aka Hydro Extrusions (multiple locations) Portland, Oregon and Vancouver, Washington

Inspection Dates: May 16-18, 2022

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1. Basic Facility and Inspection Information

Facilities: Norsk Hydro, aka Hydro Extrusions

Address	FRS Number
5325 NE Skyport Way, Portland, OR 97218	110000487606
7320 NE 55 th Avenue, Portland, OR 97218	110000771068
2210 NE Riverside Way, Portland, OR 97211	110014161209
7933 NE 21 st Avenue, Portland, OR 97211	110000774877
2001 Kotobuki Way, Vancouver, WA 98660	110070733346

Mailing Address: Same

Facility Contacts (all locations):

Jeremy Basler	Regional HSE Manager	605-760-3548	Jeremy.Basler@hydro.com
Jeni Garcia	Regional Env. Engineer	503-680-4440	Jennifer.Garcia@hydro.com
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Brian Jensen	Plant Manager	605-520-5735	brian.jensen@hydro.com
James Warram	HSE Manager	503-939-1317	james.warram@hydro.com

Agency Inspectors: Zach Hedgpeth, PE – EPA Region 10
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Agency Staff: Owen Rudloff – Oregon DEQ
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Inspection: May 16-18, 2022

Inspection Report: June 24, 2022

Inspection Notice: Unannounced

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision regarding compliance with the Clean Air Act (CAA) and applicable regulations or permits, nor is it meant to be a comprehensive report of all activities and processes conducted at the facility.

2. Introduction

- a) These were multi-media Clean Air Act (CAA) and Emergency Planning and Community Right-to-Know Act (EPCRA) Section 313 compliance inspections by the Environmental Protection Agency (EPA). This report only covers the CAA inspections. The primary CAA purpose of these inspections was to observe operations at each location and gather information regarding any air pollutant emitting activities.
- b) No advance notice was provided for these inspections.

3. Inspection Elements and Field Observations, Skyport Way – 5/16/22

- a) The inspectors (Zach Hedgpeth, Elizabeth Walters, Weston Li) along with Mr. Rudloff arrived onsite at the Skyport Way location at 09:00. We parked on the street and entered the facility grounds on foot. We entered the facility offices and spoke with Keith Wierima. I informed Mr. Wierima that we were inspectors from EPA and ODEQ and that we were onsite to conduct an unannounced inspection under the Clean Air Act. Mr. Wierima stated he would contact the Finishing Manager, Zachary Miller, and the Environmental Manager, James Warram. Mr. Miller arrived shortly thereafter, and Inspector Walters and I presented our EPA credentials to him.
- b) Additional facility staff arrived, and a short introductory meeting was held in a conference room. The attendees included the four regulatory staff, Mr. Miller, and the following: Brian Jensen (Plant Manager, Portland locations), Lasse Iversen (HSE Coordinator), and Wendy Zhang (Environmental Compliance Specialist). Facility staff informed us that they would like to wait for the arrival of the Regional Environmental Engineer, Jeni Garcia, before beginning the opening conference. In the meantime, Mr. Miller provided a basic overview of activities at each of the Portland and Vancouver facility locations.
 - 1. 5325 NE Skyport Way, Portland, OR 97218
 - i. Painting – 4 paint booths inside a single enclosure
 - ii. “Thermally improved extrusions”, or T.I.E.
 - iii. Thermal break installation
 - iv. Cutback saws
 - v. “C&C machines”, 4 pre-programmed fabrication machines
 - 2. 7320 NE 55th Ave, Portland, OR 97218
 - i. Operations ceased within the last week or two.
 - ii. Preparing to give up the lease, return to landlord.
 - iii. Past operations were fabrication machine operation.
 - 3. 2210 NE Riverside Way, Portland, OR 97211
 - i. 2 extrusion press lines
 - ii. Cutback saws
 - 4. 7933 NE 21st Ave, Portland, OR 97211
 - i. 2 extrusion press lines
 - ii. Anodizing line
 - 5. 2001 Kotobuki Way, Vancouver, WA 98660
 - i. Operations ceased near the end of 2020.

- ii. Lease given back to landlord.
- c) Following this introductory discussion, Jeni Garcia arrived and the group moved to the facility lunchroom for the opening conference.
 - 1. All those previously identified attended the first phase of the opening conference, with the exception of Mr. Wierima.
 - 2. Following introductions, I began the discussion by explaining that this was an EPA-lead inspection under the federal CAA with ODEQ participation. I described the scope of the inspection, which was to observe operations at each location and gather information regarding any air pollutant emitting activities. Inspector Walters and I presented our EPA inspector credentials to Jeni Garcia and others.
 - 3. At this point in the discussion, Jeni Garcia stated that she needed to check in with her legal counsel. Before she departed, Inspector Walters provided the TRI Notice of Inspection form and a short discussion of confidential business information (CBI) occurred. The opening conference was delayed due to facility legal consultation. During the delay, Jeni Garcia explained that facility attorneys had concerns regarding the scope of the inspection, specifically that the scope includes facilities that do not have air permits. Jeni Garcia indicated that the facility attorneys would not allow the opening conference to continue without their participation. Therefore, Inspector Walters and I began calling EPA Region 10 legal counsel to arrange representation. After several calls, I spoke with Shirin Gallagher, Assistant Regional Counsel, explained the situation, and arranged for her participation. Jeni Garcia and I exchanged attorney contact information to allow the facility and EPA legal counsel to confer.
 - 4. For a portion of the delay, Lasse Iversen provided a brief safety orientation to the inspectors.
 - 5. The opening conference reconvened at around 11:15 in the facility conference room. During this time, the attendees were the same except that Hydro counsel Jackie Belcastro along with Timothy Webster, an attorney who serves as outside counsel to the company attended via Microsoft Teams. Also attending virtually was Shirin Gallagher from EPA Region 10. Following introductions, I repeated the introductory portion of the opening conference, reviewing the scope of the inspection. In response to questions from the Hydro attorneys, Inspector Walters and I stated that we were not criminal investigators. We further explained that the inspection would be process-based. Specifically, we planned to observe all operations at the various locations and look at air pollutant emitting equipment, air pollution control equipment, monitoring, and related issues as well as any TRI related items. In response to further questioning, we stated that we had no intention of forcing testimony from company employees. Discussion occurred regarding CBI issues, and the Hydro attorneys stated that they needed a private conference with facility staff to discuss this topic before the inspection could begin. The inspection team departed for lunch at this time, around 11:50.
- d) Field Observations
 - 1. Skyport Way – Initial Walk-Through
 - i. The four agency staff returned to the Skyport Way facility around 13:20 and began our initial walk-through. We were accompanied throughout the

field walk-through by Jeni Garcia, Zach Miller, James Warram, and Brian Jensen.

- ii. Thermally Improved Extrusion (T.I.E.). The T.I.E. process area was observed by the inspection team. This process involves pouring a liquid resin into a channel in an extruded aluminum product. The resin is a 2-part epoxy that cures almost immediately. The bottom aluminum portion of the channel is then cut away by a “de-bridger”. The result is an extruded product that has two aluminum portions separated by the cured resin. The purpose of the resin is to create a thermal break in the extruded product. Emissions from the resin unit are collected by a hood and are vented to atmosphere. The process is shown in photos 514 and 515 in Attachment 1. While observing the process, Jeni Garcia informed me that emissions from this process had been estimated using an emission factor for inclusion in the facility emissions inventory for the Cleaner Air Oregon (CAO) program. Emissions from the debridger are collected and routed to a hanging sock type filtration unit that vents inside the building (see photos 516-519).
- iii. Thermal Break Assembly. This process involves connecting two aluminum pieces together with plastic thermal break material. No emissions were observed from this process.
- iv. Punch Press. The facility operates a punch press as needed. The unit was not operating at the time of the inspection.
- v. Vertical Paint Line. The vertical paint line, or VPL, is the primary source of air pollutant emissions at the facility. The line consists of a series of chambers through which long extruded aluminum products (approximately 20-30 feet long) are conveyed, attached such that they hang from a moving conveyor. The hanging product passes through 1) spray chromate conversion process (described as the “VPL Washer”), 2) “Dry Off Oven”, 3) open cool down area, 4) paint booths (inside permanent total enclosure), and finally 5) paint curing oven.
 - 1. The inspection team observed workers attaching the product pieces to the moving conveyor using gravity hooks (referred to as “racking”). The hanging product moves continuously through the process. While we observed the racking process, Jeni Garcia and Zach Miller explained that the product first enters the “VPL washer”, which includes multiple aqueous spray stages. The stages include caustic, detergent, phosphoric acid, water, rinse aid, and chrome phosphate (containing hexavalent chromium) and multiple rinse spray stages. While observing the racking area, Zach Miller stated that the facility had an aerial photo/map showing ducting and venting. This photo was provided later in the inspection.
 - 2. The inspection team walked into the process area, alongside the VPL Washer, to observe the equipment in operation. The washer is a tall, narrow process unit which is open at both ends to allow the hanging product to enter the spray zones and exit at the other end. The VPL Washer resembles two parallel walls with approximately

2-feet of space in between. The various spray stages are not separated, other than by space; the washer is one long run. The VPL washer exhausts directly to atmosphere through the building roof. There are two vents, one at either end of the washer (i.e., near where product enters and exits the washer).

3. The hanging product exits the VPL Washer and is conveyed through approximately 20-30 feet of open space to the entrance of the Dry Off Oven. There are drip troughs under the hanging product between the exit of the VPL Washer and the entrance of the Dry Off Oven. While we were in this section of the facility, one piece of hanging product fell from the moving conveyance line and landed in the drip trough below. At the time of the inspection, I observed green staining or buildup on the drip troughs near the exit of the VPL Washer as well as on an access door to the VPL Washer (see photos 522 and 524).
4. After exiting the Dry Off Oven, the hanging product passes through a serpentine route that is open to the building, which is referred to as the cool down area. After passing through the cool down area, the hanging product enters the paint booth enclosure. The paint booth enclosure includes all four paint booths, the paint curing oven, and the “paint kitchen”, where paint is mixed. The enclosure was tested in 2021 as a Permanent Total Enclosure, following EPA Reference Test Method 204 (see Attachment 3). Each of the four paint booths are horseshoe shaped areas within the Permanent Total Enclosure. The exhaust from the Permanent Total Enclosure is routed to a regenerative thermal oxidizer (RTO).
5. During the initial walk-through of the VPL, I indicated that I would need to return to this section of the facility later in the inspection in order to take a more ordered set of photographs. I also requested access to the facility roof in order to observe the emission stacks.
 - vi. RTO and Paint Kitchen. We briefly observed the RTO from a distance and looked through the doorway into the “paint kitchen”, where paint is added to the automated spray booth system. The paint kitchen is a respirator required area, so we did not enter.
2. The group returned to the office and discussed the inspection plan for the following day. I indicated the items on my list for CAA items currently included revisiting the VPL, washer and paint booths, accessing the facility roof and examining the RTO.
3. We departed the facility around 15:15.

4. Inspection Elements and Field Observations, Skyport Way and 55th Ave – 5/17/22

- a) Inspector Walters and I returned to the Skyport Way facility around 09:00 to continue the inspection. Weston Li of ODEQ joined us. Generally throughout the day, we were accompanied by Jeni Garcia, Zach Miller, James Warram, and Jeremy Basler.
- b) CBI Forms. Shortly following arrival, I provided the EPA CAA CBI (confidential business information) forms to the facility staff.
- c) Process Discussion. Jeremy Basler led a discussion of certain aspects of the process.
 - 1. Chromate conversion. The facility operates a chromate conversion process to convert the hexavalent chromium in the wastewater stream from the VPL Washer into trivalent chromium.
 - 2. VPL Washer. Mr. Basler confirmed that the VPL Washer is equipped with two vents to atmosphere, but also has two natural gas burner vents. The washer is generally considered to have five stages, with the vents being located above stages 1 and 5 (entrance and exit). Mr. Basler provided an aerial photo of the roof above the VPL which was annotated with labels for each emission stack (see photo 526). The following “Building 4 Roof Vents” were identified:
 - i. #1 – VPL Washer stage 1 burner exhaust.
 - ii. #2 – VPL Washer entrance vent to atmosphere.
 - iii. #3 – VPL Washer stage 3 burner exhaust.
 - iv. #4 – VPL Washer exit vent to atmosphere.
 - v. #5 – VPL Dry Off Oven vent to atmosphere.
 - vi. #6a, 6b, and 7 – Building air vents
 - vii. #8 – on the diagram, this appears to be mislabeled and should be labeled #7 as a building air vent.
 - viii. Four pickups from the paint booths are shown in the upper right hand section of the photograph, but are not labeled.
 - 3. Horizontal Paint Line (demolished). A second aerial photo showing more of the roof was also provided (see photo 527). This photo shows an area marked in orange dotted line in the lower section of the photo which indicates the area of the roof where the vents from the former horizontal paint line used to be. The entire horizontal paint line has been removed/demolished. This was a manual paint line that was used for larger products that could not be processed in the VPL. The lighter gray marked area on the same building was showing the horizontal pre-treat area, which has also been removed/demolished and is no longer operating.
 - 4. Paint Booths. A process flow diagram showing the paint booths was examined and discussed by the group. Mr. Basler explained that the booths are horseshoe shaped, with the hanging product traversing the inside wall of the horseshoe in order to be painted. Paint is sprayed via automated sprayer from the center outward towards the product. The automated spray nozzle moves up and down inside the horseshoe shaped booth. Overspray therefore primarily hits the inside of each horseshoe shaped booth. Each booth is equipped with a vertical plenum that pulls a vacuum on each booth and creates positive pressure to “push” vapors through the collection duct system to the RTO. The RTO is also equipped with an induced draft fan, creating a “push/pull” vacuum balance system for vapor collection. Facility staff indicated there was a pressure set point for the system,

but were unsure of the details, such as the location of the sensor(s) and the value of the pressure set point.

5. Permanent Total Enclosure. A diagram of the enclosure was provided (see photo 528). Each natural draft opening, or NDO, is shown with a red circle. The locations correspond to the entrance to the paint booths, the exit from the paint curing oven, and two louvered and filtered openings in the paint kitchen.
- d) 55th Avenue Building. Around 10:15 the group walked to the facility building located on 55th Avenue, about a block away. The building was generally empty, with no industrial activity observed to be occurring. A few staff were onsite finishing up some cleanup operations. Facility staff indicated the building formerly housed various fabrication operations, such as cutting, grinding, bending, punching, machining, and welding.
- e) Skyport Way – RTO. We returned to the Skyport Way location around 10:45 and examined the regenerative thermal oxidizer. The unit is a Tellkamp “Roxidizer”, Model 30 according to the label. Photos were collected of the overall installation, the bed temperature displays (reading around 1,600°F), inlet/outlet ducts and testing ports, inlet static pressure gauge, and the lower bed temperature probes (see photos 529-543). Mr. Basler indicated the unit was installed around 2015. Mr. Warram stated that the unit had been just recently emission tested in April 2022. According to Mr. Warram, the RTO has an alarm that trips if the combustion temperature drops too low, around 1,525°F according to his memory. I did not ask to check the specific number. Mr. Miller stated that an alarm and light is triggered inside the plant and the VPL is shut down if the RTO combustion temperature falls below the alarm set point.
- f) Roof. From around 11:40-12:00, I climbed to the facility roof with Mr. Miller, Mr. Basler, and Mr. Li. Photos 544-553 were recorded showing the vents to atmosphere. A visible vapor plume was observed from the VPL Washer entrance vent to atmosphere (#2 above), but no vapor was visible from the VPL Washer exit vent to atmosphere (#4 above). No stack testing ports were observed from either of the VPL Washer stacks, which were equipped with “hats”.
- g) The inspectors departed the facility around 12:10 for lunch, and returned around 13:05 to the Skyport Way location.
- h) FLIR Inspection. Inspector Walters and I brought the FLIR GF320 infrared gas imaging camera onsite and turned the unit on. We explained the function of the camera, which is to provide qualitative visual observation of volatile organic gasses that are invisible to the human eye. The specific camera used during this inspection was S/N 44401715. Use of the camera during this inspection followed U.S. EPA Region 10 Office of Environmental Assessment Standard Operating Procedure OEAFIELDSOP-111 entitled “Optical Gas Imaging with a FLIR GF320 Infrared Camera”, which is included as Attachment 4. Jeni Garcia asked to take a photo of the camera and hard copy SOP, which I allowed. During the FLIR inspection, we visually inspected the following potential sources of volatile organic compound (VOC) emissions. No VOC leaks or emissions were observed during the visual inspection of these locations. No videos were recorded using the FLIR GF320.
 1. Inlet natural draft opening (NDO) to the permanent total enclosure.
 2. Outlet NDO to the permanent total enclosure.
 3. Paint kitchen NDO.
 4. RTO.

- i) VPL, Second Walk-Through. The group next returned to the Vertical Paint Line where I took an additional set of photos to more fully document the process. See photos 554-558 in Attachment 1.
- j) Office Discussion. At around 14:20 we returned to the facility office. A discussion occurred regarding the remaining two locations on Riverside Way and 21st Avenue. Facility staff noted that the 21st Avenue location is referred to as the “Main Plant” because most of the offices are located there. The following information regarding the operations at these two locations was provided:
 - 1. 2210 NE Riverside Way, Portland, OR 97211
 - i. The facility operates two extrusion presses. One press has an 8-inch die opening, while the other has a 10-inch opening. After pressing, extruded product enters natural gas fired “aging ovens” which heat the product to approximately 350-450°F for hardening to specification. The duration each product is heated in the aging ovens varies depending on specifications. The facility has four aging ovens. Nothing is sprayed or added to the product.
 - ii. The facility operates various saws, with emissions being controlled by small filtration systems that vent into the building air.
 - iii. The facility does not operate any large-scale welding or plasma cutting, and the fabrication operations have generally been moved to a Hydro facility in Arizona.
 - 2. 7933 NE 21st Ave, Portland, OR 97211
 - i. The manufacturing processes at this facility are very similar to those at the Riverside facility, except that the two extrusion press die openings are 7-inches and 9-inches.
 - ii. Additionally, the facility operates an anodizing line that includes 23 tanks.
- k) The group discussed the inspection plan for the following day, which was to inspect both the Riverside and 21st Ave facilities. We agreed to meet the following morning at the 21st Avenue location at 09:00.
- l) The three inspectors departed the facility around 15:15.

5. Inspection Elements and Field Observations, Riverside Way and 21st Ave – 5/18/22

- a) Inspector Walters and I arrived at the 21st Avenue facility around 09:00 to continue the inspection. Weston Li of ODEQ joined us. In the facility offices, we met with Jeni Garcia, James Warram, and Jeremy Basler, who generally accompanied us throughout the day.
- b) The group discussed the inspection plan for the day. The plan will be to walk through the Riverside Way facility followed by the 21st Avenue facility. A closing conference was planned at the conclusion of the inspection following the walk-through’s. During the discussion, facility staff informed the group that one product is added to the aluminum prior to entering the presses: boron nitride. This product is painted/sprayed onto the aluminum billet to prevent it from sticking to the “stem” of the presses.
- c) Field Observations
 - 1. Riverside Way

- i. 10-inch Press. We began by observing the billet heater, hot saw, press, and cold air and water quench equipment associated with the 10-inch press line. The billet heater is natural gas fired and is vented to atmosphere. The hot saw cuts the billet into smaller pieces that are fed into the press for extrusion. Air emissions from the hot saw are collected and pneumatically conveyed to a Donaldson Torit filter that vents into the building air. I observed the hot saw make a cut and did not observe any visible emission escaping into the building. The metals cuttings/filing collected by the pre-filter cyclone were observed and are shown in photo 565. Visible vapor emissions to the building air were observed from the cold water quench shown in photo 564, but Mr. Basler informed me that only water is used in this equipment.
 - ii. 8-inch Press. We did not observe the 8-inch press line equipment in detail. Facility staff stated that the two lines contained similar equipment.
 - iii. Aging Ovens. The aging ovens were observed and are shown in photo 566. The ovens are natural gas fired and are vented to atmosphere.
 - iv. Die Boil-Out. A small (approximately 3' x 3' square, surface area) heated bath of caustic soda (sodium hydroxide solution) is used to periodically boil press dies that have residual aluminum left in them. The caustic bath helps to separate the aluminum from the steel die. After this treatment, the aluminum residual must be manually chipped out so the die can be reused. The die boil-out caustic bath is equipped with a hood and is vented to atmosphere. The process was not being used at the time of the inspection.
 - v. "Guyson". The facility operates a small bead media abrasive cleaning unit known as a "Guyson". The unit has a similar function to sand blasting. The unit is equipped with an internal filter and vents to the building air. The Guyson was not operating at the time of the inspection.
 - vi. We departed the Riverside Way facility around 10:20 and walked back to the adjacent 21st Avenue facility.
2. 21st Avenue
 - i. Prior to proceeding to the field, a short discussion occurred in the conference room. Inspector Walters requested a process flow diagram of the anodizing line showing the arrangement and contents of each tank.
 - ii. 9-inch Press. We observed the process equipment included in the 9-inch press production line. All equipment appeared very similar to that observed at the Riverside Way facility. I noted the boron nitrite solution being painted onto the ends of aluminum billets. The solution appeared as a white liquid. While observing the boron nitrite addition, Mr. Basler noted that the scraps of aluminum that have this solution on them are being disposed of by Hydro as a waste stream, and questioned whether they should qualify as "clean charge" under 40 CFR 63, subpart RRR.
 - iii. Maintenance area. The facility has a small maintenance area where certain operations are conducted to maintain and repair equipment as needed. The work performed includes hand welding, presses, drills, and other shop equipment.

- iv. Aging Ovens. The ovens at the 21st Avenue location appeared similar to those observed at the Riverside Way facility.
- v. Anodizing Line. Inspector Walters led the examination of the anodizing line. It was noted that the facility operates two sealing tanks containing nickel (Tanks 18 and 19).
- d) The group returned to the offices at the 21st Avenue location for a brief meeting.
 - 1. I brought up Mr. Basler's question related to clean charge in order to respond in a more complete manner in the office. I explained that the facility has the option to submit written applicability determination requests to EPA in order to obtain answers to questions regarding whether specific scrap streams or types of scrap would qualify as "clean charge" under the National Emission Standards for Hazardous Air Pollutants (NESHAP). I provided contact information for the Geoffrey Glass, the Region 10 staff member who serves as the contact for NESHAP and other air quality rule related questions. Mr. Basler indicated that Hydro has multiple types of scrap that they believe industry standard has been to consider these as "clean charge", but the company is not currently sending these types of scrap to their furnaces in The Dalles for remelting.
 - 2. Mr. Li reviewed certain Oregon DEQ permitting requirements and applicability topics.
- e) The inspectors departed the facility around noon for lunch.

6. Closing Conference

- a) The closing conference began around 13:45. I led the discussion, including providing an overview of the EPA Region 10 compliance process.
- b) Attendees:
 - 1. Hydro: Jeremy Basler, Brian Jensen, Jeni Garcia, Zach Miller, James Warram
 - 2. ODEQ: Weston Li
 - 3. EPA: Zach Hedgpeth, Elizabeth Walters
- c) During the closing conference, the following issues were identified as potential compliance concerns. I clarified that these items did not necessarily constitute violations and may not include any additional compliance concerns that are identified post-inspection.
 - 1. Uncontrolled emissions from the VPL Washer, including hexavalent chromium emissions.
 - 2. Pressure monitoring for the permanent total enclosure to confirm capture continues to perform in the manner it did during the performance testing.
 - 3. 40 CFR 63, Subpart WWWW potential applicability to the nickel sealing tanks located in the anodizing line at the 21st Avenue facility.
- d) Additional discussion occurred regarding confidential business information (CBI). None of the photos or information gathered by EPA during the inspection is considered to be CBI by the facility, according to Mr. Basler and Mr. Jensen.
- e) The facility staff requested that the inspection reports be sent to both Jeremy Basler and Jeni Garcia.

- f) I hand wrote a records request list and discussed each item with facility staff. A submittal date of close-of-business on Friday, June 17, 2022 was agreed upon by both the facility and EPA. The facility staff made a photocopy of the records request list, which has been included as Attachment 5 to this report.
- g) The inspectors departed the facility around 14:40.