



# Oregon

Tina Kotek, Governor

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July 3, 2025

Viper Technologies, LLC (Thortex)  
15045 NE Mason St.  
Portland, OR 97230  
*Sent electronically only*

Kevin Stonelake,

DEQ has completed its review of the Cleaner Air Oregon (CAO) Emissions Inventory, Modeling Protocol, and Level 1 Risk Assessment submitted on June 17, 2025, by Bridgewater Group on behalf of Viper Technologies, LLC (Thortex) for its facility in Portland, OR. In an email dated June 26, 2025, DEQ responded to the Risk Assessment submittal with the following proposed updates:

1. The Emissions Inventory (AQ520 Form) and Level 1 Risk Assessment Tool must include vanadium and compounds (CASRN 7440-62-2). The standard specifications for the composition of the bar stock provided to Chris Moore at DEQ on June 24, 2025, include vanadium at 3.5-4.5 percent by mass.
2. Because site-specific analytical data is not currently available for vanadium, Thortex's potential vanadium emissions will be assumed equal to reported emissions of aluminum and compounds (CASRN 7429-90-5), for which analytical data is available. This emissions assumption is conservative, because: 1.) the standard specifications indicate aluminum content in the bar stock is higher than vanadium content; and 2.) the polishing compound used on the parts contains a significant amount of aluminum, but no vanadium.

In an email dated July 1, 2025, Bridgewater Group, on behalf of Thortex, indicated agreement with these proposed updates and requested an update to the Facility Contact information. DEQ has made the updates and provided them as Attachments 1 and 2 to this letter. In accordance with Oregon Administrative Rule (OAR) [340-245-0050\(2\)](#), DEQ approves this version of the Emissions Inventory and Level 1 Risk Assessment Tool. DEQ also approves the "Cleaner Air Oregon Level 1 Modeling Protocol And Risk Assessment" Report submitted on June 17, 2025, with Table 3-1 amended as follows:

**Table 3-1: Level 1 Risk Assessment Summary**

Exposure	Risk*	Rounded Risk**	Source Permit Level
Cancer Risk			
Residential	0.037	<0.1	0.5
Child	0.0011	<0.1	
Worker	0.054	0.1	
Chronic Non-Cancer Risk			
Residential	0.0081	<0.1	0.5
Child	0.0012	<0.1	
Worker	0.033	<0.1	
Acute Risk	0.094	0.1	0.5

\* "Risk" refers to Excess Cancer Risk and Noncancer Hazard Index [OAR 340-245-0020]

\*\* For comparison to the Source Permit Level the final risk calculation is rounded off to one decimal place. [340-245- 0200(4)(a)(A)]

The resulting Excess Cancer Risk, Chronic Noncancer Hazard Index, and Acute Noncancer Hazard Index values determined by the risk assessment are all below the Source Permit Level for New and Reconstructed sources and therefore do not require any Source Risk Limits in the permit to limit the risk from toxic air contaminant emissions from this facility at this time. Monitoring, recordkeeping, and reporting conditions may be included in the permit to ensure risk does not exceed the levels modeled in the risk assessment.

Thortex has completed the AQ501 CAO Permit Application form and paid the required fees. The next step in the process is for DEQ to draft the Air Contaminant Discharge (ACDP) permit and provide you with the opportunity to review and comment.

If you have any questions regarding this letter, please contact me directly at 503-866-9643 or [julia.degagne@deq.oregon.gov](mailto:julia.degagne@deq.oregon.gov).

Sincerely,



Julia DeGagné  
Cleaner Air Oregon  
Project Engineer

Enc: Attachment 1: Updated Emissions Inventory (AQ520 Form): "AQ520Form 2025-07-01.xlsx"  
Attachment 2: Updated Level 1 Tool: "Level1Tool\_Thortex\_2025-07-01.xlsx"

Cc: Travis Quarles, Bridgewater Group, Inc.  
Chris Moore, DEQ  
Thomas Rhodes, DEQ

Lisa Ball, DEQ  
J.R. Giska, DEQ  
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