



June 24, 2022

VIA E-MAIL JR.GISKA@DEQ.OREGON.GOV

J.R. Giska, P.E.
Cleaner Air Oregon Program Engineer
Oregon Department of Environmental Quality
700 NE Multnomah St., Ste. 600
Portland, OR 97232

**Re: Cleaner Air Oregon
Response to request dated April 20, 2022
ENTEK International LLC**

Dear Mr. Giska:

Please find enclosed the information and updates requested by Cleaner Air Oregon (CAO) by e-mail correspondence dated April 20, 2022:

REQUEST #1 – *Revised technical documents submitted as part of the CAO risk assessment to date (i.e., Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan, Risk Assessment), as applicable, that include updated TEU and Toxic Air Contaminant (TAC) emissions information if it is determined that TAC emissions from activities occur at your facility that are no longer Categorically Exempt (see OAR 340-245-0060(3)(b), and either:*

- a. Those TEUs and emissions must be included in the risk assessment pursuant to OAR 340-245-0060(3)(a); or*
- b. Those activities were determined to qualify as Exempt TEUs under OAR 340-245-0060(3)(a). In these cases, those TEUs must still be reported in the Emissions Inventory; however, the TAC emissions from those TEUs are not required to be calculated for the purposes of the CAO program. [OAR 340-245-0040(a)(A)]*

RESPONSE – We determined that there are TAC emissions from activities taking place at our facility that are no longer Categorically Exempt. The updated Emissions Inventory and Modeling Protocol have been provided via a separate submittal as part of the response to ENTEK CAO Modeling/Risk Assessment Work Plan comment letter dated May 26, 2022 and addressed to Mrs. Kim Medford. Please note that no changes to the Risk Assessment Work Plan were necessary at this time.

REQUEST #2 – *Complete and submit the Categorically Exempt Toxics Emissions Units AQ523 Form for the activities occurring at your facility that qualify as Categorically Exempt TEUs in order to satisfy the requirements in OAR 340-245-0040(a)(A).*

RESPONSE – Please find attached AQ523 Form.

Please contact me if you have any questions regarding this submittal.

Sincerely,
ENTEK International LLC



Agustin Figueroa
Director, EHS

Attachment: Categorically Exempt TEUs AQ523 Form

cc: Kim Medford, ENTEK
Geoff Schiveley, ENTEK
Tom Wood, Stoel Rives
File



CATEGORICALLY EXE PT TOXICS EMISSIONS UNITS

Facility name: **ENTEK International LLC** Permit Number: **22-6024-TV-01**

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 checked="" type="checkbox"/> | <input type="checkbox"/> | Evaporative and tail pipe emissions from on-site motor vehicle operation. |
| <input checked="" 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 checked="" 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 checked="" type="checkbox"/> | <input type="checkbox"/> | Office activities. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Food service activities. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Janitorial activities. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Personal care activities. |
| <input checked="" 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 checked="" type="checkbox"/> | On-site laundry activities. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | On-site recreation facilities. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Instrument calibration. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Automotive storage garages. |

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|-------------------------------------|-------------------------------------|--|
| <input checked="" 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 checked="" type="checkbox"/> | <input type="checkbox"/> | Temporary construction activities. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Warehouse activities. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Accidental fires and fire suppression. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Air vents from compressors. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Air purification systems. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Continuous emissions monitoring lines. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Demineralized water tanks. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Pre-treatment of municipal water, including use of deionized water purification systems. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Electrical charging stations. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Fire brigade training. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Instrument air dryers and distribution. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Fully enclosed process raw water filtration systems. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Electric motors. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Pressurized tanks containing gaseous compounds that do not contain toxic air contaminants. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Vacuum sheet stacker vents. |
| <input checked="" 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 checked="" type="checkbox"/> | Log ponds. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Stormwater settling basins. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Paved roads and paved parking lots within an urban growth boundary. |
| <input type="checkbox"/> | <input checked="" 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 checked="" type="checkbox"/> | <input type="checkbox"/> | Health, safety, and emergency response activities. |
| <input checked="" 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 |

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|-------------------------------------|-------------------------------------|---|
| | | 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. *All spark ignition engines remain exempt. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Non-contact steam vents and leaks and safety and relief valves for boiler steam distribution systems. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Non-contact steam condensate flash tanks. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Non-contact steam vents on condensate receivers, deaerators and similar equipment. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Boiler blowdown tanks. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Ash piles maintained in a wetted condition and associated handling systems and activities. |