



Oregon

Kate Brown, Governor

Department of Environmental Quality
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July 10, 2020

Entek International LLC
250 Hansard Ave.
Lebanon, OR 97355

RE: Warning Letter with Opportunity to Correct
ENTEK International LLC
2019-WLOTC-4992
22-6024-TV-01
Linn County

Ms. Medford,

This letter provides an update on the status of completion of the Corrective Actions required to finalize the emissions inventory for the Cleaner Air Oregon (CAO) program as outlined in the Warning Letter with Opportunity to Correct (WLOC) that DEQ issued to Entek International (Entek) on October 8, 2019. This letter also serves to amend the deadline in the WLOC for fulfillment of the remaining Corrective Action items.

Entek has provided some of the required information needed to satisfy the Corrective Actions from the WLOC. Entek recently submitted the Leak Detection and Repair (LDAR) fugitive emission estimates for the Trichloroethylene (TCE) service components, as required by Corrective Action 4(a), on February 7, 2020. DEQ has reviewed and approves the LDAR fugitive emissions calculations for the TCE service components. Additionally, Entek has completed a number of facility improvements to control fugitive emissions from production activities since the issuance of the WLOC.

Because there have been several communications between DEQ and Entek regarding the material submittals required for approval of the CAO emissions inventory since the issuance of the WLOC, DEQ hereby clarifies the following WLOC Corrective Actions still outstanding:

1. **Corrective Action 1: Revised emission inventory has not been submitted.**
 - a. Entek did not submit a revised inventory for DEQ review and approval. Entek must submit a revised AQ405CAO emissions inventory form that includes the following:
 - i. 2018 Actual emissions as calculated by the material balance method consistent with Title V emission calculation methods and values submitted in the 2018 Annual Report. DEQ records indicate the warehouse Continuous Emission Monitoring System (CEMS) was not certified until a Relative Accuracy Test Audit (RATA) was performed in May 2019;

therefore this data is not appropriate for use in in the 2018 Actual emissions calculations for EU-1.

- ii. Requested Potential To Emit (PTE) emissions that may be based on an alternative to the method in (i) above, which must include CEMS emissions data from both the warehouse and carbon bed stacks (see Corrective Actions 2 & 3 below), along with the LDAR fugitive emissions.

2. Corrective Action 2: The continuous emission monitoring data is incomplete.

- a. Entek provided the requested CEMS data as required by Corrective Action 2 in the WLOC. DEQ reviewed these data and finds that the CEMS data from the main carbon stack is currently incomplete and must be revised. The data does not account for TCE emissions occurring during the carbon bed regeneration cycles. Carbon bed regeneration is a distinct process that occurs for a duration of approximately six to seven minutes every 63-65 minutes, and is necessary for maintaining the control efficiency of the carbon beds. During this operation cycle the increased moisture content in the exhaust stack interferes with the ability of the CEMS to accurately measure TCE and data is not recorded. Given the frequency of this process step and the associated potential increased TCE emissions not accounted for, DEQ requires that TCE emissions during this period be addressed in the revised emissions inventory.

3. Corrective Action 3: Emissions from product off-gassing must be included in the revised emission inventory.

- a. Entek continues to assert that over three tons of TCE emissions resulting from production of battery separators that occur in the storage warehouse are “warehouse activities” and are thus “Categorically Insignificant”. As noted in previous communications, DEQ cannot consider these emissions of over 3 tons per year of TCE an insignificant “warehouse activity”, and will not exempt emissions of this quantity of a chemical with carcinogenic, developmental, reproductive, and neurological health impacts from the risk assessment for this facility.

For these reasons, Entek must include these TCE emissions from the storage warehouse building in the revised inventory. As noted above in 1(a)&(b), the 2018 Actual emissions will need to be derived from the 2018 Annual Report, but the Requested PTE may be estimated from the emissions data collected by the CEMS on the recently installed stack for this building.

4. Corrective Action 4(b)&(c): Facility improvements reducing fugitive emissions.

- a. To substantiate that no TCE fugitive emissions occur from either your production facility or interim storage areas, and do not need to be included in your revised emissions inventory, please provide detailed descriptions of the facility upgrades that have been made in efforts to maintain negative air pressure in these areas at all times, and provide a summary of the results for the most recent EPA Method 204 testing to demonstrate Permanent and Total Enclosure of these areas.

Should these violations remain uncorrected or should you repeat any of these violations, this matter may be referred to the Department’s Office of Compliance and Enforcement for formal enforcement

action, including assessment of civil penalties and/or a Department order. Civil penalties can be assessed for each day of violation. Further, pursuant to OAR 340-245-0030(4)(a), DEQ may modify the information that has been submitted and provide Entek with a final approved EI for use in completing the CAO process.

DEQ appreciates the collaboration and significant efforts made by Entek to fulfill the WLOC Corrective Actions. In order to complete the Corrective Actions noted above and avoid further enforcement, provide the requested items for review and approval, that includes all the emissions noted above, **by no later than August 10, 2020.**

DEQ remains available to work with your team on any issues related to establishing the final emissions inventory and any requested documents prior to submittal for review and approval. Thank you again for your continued assistance with this process.

Sincerely,

< Electronically Signed, J.R. Giska >

J.R. Giska
DEQ CAO Program Engineer

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