



August 7, 2020

J.R. Giska ([giska.jonathan@deq.state.or.us](mailto:giska.jonathan@deq.state.or.us))  
Cleaner Air Oregon Program Engineer  
Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232

Re: Cleaner Air Oregon Fugitive Emissions Inventory

Dear Mr. Giska:

ENTEK International (ENTEK) received your letter dated July 10, 2020 following up on your October 8, 2019 Warning Letter with Opportunity to Correct. This letter is ENTEK's response.

Since the Department's October 2019 letter was issued, ENTEK met with DEQ and the U.S. Environmental Protection Agency (EPA) to discuss a trichloroethylene (TCE) ambient monitoring program that would take place in the community surrounding ENTEK's Lebanon facility. While ENTEK assisted EPA in obtaining permission to site monitors throughout the community, the monitoring program was implemented entirely by EPA. This monitoring took place in two phases between November 19 through December 31, 2019. During the first phase, most of the monitors did not detect TCE, with a few that were slightly over the detection limit (all were  $<1.0 \text{ ug/m}^3$ ). During the second phase, no TCE was detected in any of the monitors. As you know, DEQ's acute risk-based concentration equivalent to a Hazard Index of 1 (the level at which no negative impacts are expected) is  $2.1 \text{ ug/m}^3$ . November and December are the times of the year where there is the poorest dispersion and so we understand that these data reflect "worst case" concentrations. EPA's monitoring data document that ENTEK does not pose a risk to our community—a conclusion that we understand EPA shares. ENTEK encourages DEQ to post the EPA ambient monitoring reports on its web page so that the public has access to this important information.

Since the Department's October 2019 letter was issued, ENTEK also met with DEQ regarding our effort to better capture TCE fugitive emissions in our emissions inventory. Hundreds of hours of effort were invested in this project and the final work product was submitted by letter dated February 7, 2020. We appreciate your approving this fugitive emissions inventory. Please note that we have made a slight adjustment to the component count in completing the attached AQ405CAO form.

In the July letter, you requested that we provide you with a response to four corrective actions identified in your letter. Each of your requests is reproduced in italics below, followed by our response.

***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:*

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