



February 7, 2020

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

Re: Cleaner Air Oregon Fugitive Emissions Inventory

Dear Mr. Giska:

As we previously committed, ENTEK International (ENTEK) has completed a comprehensive survey of all of our piping systems in TCE service and prepared the attached fugitive emissions inventory. As part of this effort, we have identified each point outside our Permanent Total Enclosures where fugitive emissions have the potential to occur (e.g., valves, flanges, connectors) and individually identified them in the attached spreadsheet. We then calculated potential fugitive emissions from each point and summed the total. With this submittal, we believe that we have fully responded to your request. Below is an explanation of the structure of our submittal.

In order to most accurately categorize the potential fugitive emission points, and to assist in recordkeeping, we have broken the facility into zones. One of the individual sheets of the attached spreadsheet is a zone map so that you can orient yourself to where each zone is located.

In the Emissions Factor Methodology sheet, we present how each individual emission factor is calculated. We maintain an aggressive Leak Detection and Repair (LDAR) program with the leak threshold 50 times more stringent than that applied in heavily regulated areas such as South Coast Air Quality Management District. Therefore, we applied control assumptions consistent with that level of LDAR program. Our methodology and an example calculation are all shown in the Emissions Factor Methodology sheet.

Each of the following sheets correlates to a zone as identified in the zone map. The TCE concentrations and assumptions specific to that zone are shown in the notes at the bottom of each sheet. Emissions are calculated for each individual component based on an emission factor specific to the component type and TCE service. Each component is conservatively assumed to be in operation for 8,760 hours per year which overstates emissions.

Individually identifying each potential point of fugitive emissions to atmosphere across our facility and qualifying their emissions on a point-specific basis has been a tremendous task consuming hundreds of person-hours of effort. We believe that the attached fugitives inventory is very conservative as we consistently made assumptions that overstate emissions. We will continue to review our work and may

make corrections to this submittal as we work our way through the Cleaner Air Oregon process. However, we believe that the attached inventory is a robust, albeit conservative, estimate of our fugitive emissions.

Please let me know if you have any questions about this document or our approach to identifying each emission point. We look forward to continuing to work with you as we proceed through the Cleaner Air Oregon process

Very truly yours,



Kirk Hanawalt

Attachment: Fugitives Emissions Inventory (Excel)

cc: Karen White-Fallon (karen.white-fallon@state.or.us)

