



November 5, 2019

J.R. Giska ([giska.jonathan@deq.state.or.us](mailto: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 Emissions Inventory

Dear Mr. Giska:

I am sorry that we were not able to hold today's plant visit as scheduled. One of the things that we planned to do at the visit was to present you with the requested data for the Main Stack CEMS and Warehouse CEMS. As we were not able to share those data in person, I will be getting those files to you via a secure download link (e-mail won't work because the CEMS files are too large) tomorrow.

We had also discussed that we were going to have the information on-hand supporting our 2018 material balance calculations. As you know, this is not the compliance methodology that we anticipate employing in the future. However, we wanted to answer any questions that you might have about those data. Given that we were not able to meet today, I will send you the supporting material so that you can review it in advance of our on-site meeting. Those files will be included with the CEMS files. I have formatted it in a manner that no confidential business information should be at risk of disclosure. You will see that these data detail the basis for determining the 15.47 tons of TCE that was shipped off site in product in CY 2018. I would be happy to walk you through these data when you come to our site. This will be very similar to the discussion we had about the mass balance last spring, but you will have greater context this time.

We anticipate that our next submittal will be on or before December 6<sup>th</sup>, when we will provide you with a revised emissions inventory reflecting the count of components in TCE service and the associated emissions quantification methodology. We are working hard on the component count and hope to have that completed in time to meet our commitment. We shall promptly inform you if it appears that we will have trouble meeting that deadline.

We look forward to hosting the CAO team for a site visit later this month. In the interim, if you have any questions, please do not hesitate to call me.

Very truly yours,

A handwritten signature in blue ink that reads "Kirk R. Hanawalt". The signature is fluid and cursive.

Kirk Hanawalt

Attachment: VARA CEMS & Warehouse CEMS data (Excel)

cc: Mr. Keith Johnson ([Keith.Johnson@state.or.us](mailto:Keith.Johnson@state.or.us))  
Karen White-Fallon ([karen.white-fallon@state.or.us](mailto:karen.white-fallon@state.or.us))

