



Oregon

Kate Brown, Governor

Department of Environmental Quality
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November 6, 2019

Entek International LLC
250 Hansard Ave.
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Mr. Hanawalt,

In response to the letter received by DEQ on Thursday October 24, 2019, DEQ approves your extension request regarding the compilation of TCE service components as requested in the WLOTC-4992 sent by DEQ on Tuesday October 8, 2019. As requested, please provide the component list for all potential fugitive emission points at the facility by your requested date of Friday December 6, 2019.

In regards to the Method 204 demonstration, DEQ received a testing protocol from Bison Engineering on behalf of ENTEK International (Entek) on Monday October 14, 2019. The DEQ Source Test Coordinator responded to Bison Engineering requesting additional information and received a response on Monday, November 4, 2019. In order for DEQ to approve the Method 204 demonstration testing protocol DEQ will need to review all requested information.

In response to the comment on material balance calculations, without a Method 204 demonstration of Permanent and Total Enclosure (PTE) for the production facility, DEQ maintains the request to provide material balance emission estimates as part of the Cleaner Air Oregon (CAO) emissions inventory. The current operating state of the facility is insufficient for claiming the production facility is under PTE and therefore fugitive emissions must be accounted for in the emissions inventory; DEQ is requiring these emissions be provided using a material balance approach.

In response to Entek's request that warehouse emissions be removed from the CAO emissions inventory as this emissions unit should be considered "exempt" from the CAO process as "warehouse activities" are listed as a categorically insignificant activity, DEQ appreciates Entek's position on this issue and is currently reviewing the applicability of the request.

Please contact me directly if you anticipate any further issues or seek clarification on any part of the request (503.229.5178, giska.jonathan@deq.state.or.us), and we look forward to your continued assistance with this process.

Sincerely,

J.R. Giska
DEQ CAO Program Engineer

Cc: Kim Medford, ENTEK
Tom Wood, Stoel-Rives

Karen White-Fallon, DEQ
Keith Johnson, DEQ
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File