



November 25, 2019

Mr. J.R. Giska  
DEQ CAO Program Engineer  
Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232

Re: Cleaner Air Oregon Emissions Inventory

Dear Mr. Giska.:

First, let me thank you for taking the time to visit our facility earlier this week. There are no similar facilities in the state (and few in the world) so it is really valuable to have you see our operations. It is hard to appreciate the level of negative air that we maintain in the areas where TCE is handled without personally experiencing the rush of air when you open a door. ENTEK is proud of our state-of-the-art facility and always happy to show it off. We recognize that you have a busy schedule and really appreciate that you were willing to take the time to make the trip.

The purpose of this letter is to follow up on your letter dated November 6, 2019 and the discussions we had during your site visit. We had requested, and you had granted, an extension of the deadline for submitting the revised inventory reflecting our proposed approach to accounting for fugitive emissions from our components in TCE service outside the total enclosures. As your visit showed you, tracking this piping is not easy. We have one person assigned to the project full time and several other people helping him. They are several weeks into the effort and have traced a lot of feet of piping. However, there is far more work still to be completed for this effort and we are realizing that we grossly underestimated the amount of human resources that it would take to accurately complete the task. Compounding the time required for the project is the fact that we have had one key employee who has been ill, and we are entering the holiday season and year-end where people are using up vacation time. In addition, once the staff who have inventoried the components are complete, someone fairly senior needs to review all of their work and ensure that they have accurately identified those components that are in TCE service as opposed to a component in one of the many pipe systems handling non-volatile substances. As it is very important to ensure the accuracy of this component count, I am requesting an additional 60 days to complete this task. Putting a date to that, I request that DEQ extend the submittal deadline to Friday, February 7, 2020.

Again, I apologize for us not having better estimated the time needed for this task up front. It really took getting 100+ man-hours into the project to get a sense of the scale as well as to develop a consistent means of collecting data so that we generate an accurate and verifiable component count. I simply did not foresee the scale of the effort up front, but we want to see the job through to the end with the high standard of accuracy that we apply to everything we do.

Thank you for your consideration of this request. Please let me know if you have any questions after reviewing this letter.

With best regards,

*Kirk R. Hanawalt*

Kirk Hanawalt

cc: Kim Medford  
Tom Wood

