



June 3, 2019

**BY EMAIL**

J.R. Giska ([giska.jonathan@deq.state.or.us](mailto:giska.jonathan@deq.state.or.us))  
Oregon Department of Environmental Quality  
700 NE Multnomah St.  
Suite 600  
Portland, OR 97232-4100

**Re: Cleaner Air Oregon Emissions Inventory**

Dear Mr. Giska:

On March 4, 2019, ENTEK International LLC (ENTEK) received a letter from Keith Johnson providing us written notice pursuant to OAR 340-245-0050 that our facility was being called into the Cleaner Air Oregon (CAO) risk assessment process. OAR 340-245-0030(1)(a)(A) specifies that an emissions inventory must be submitted to DEQ no later than 90 days after the DEQ notice date and OAR 340-245-0040(1) specifies that the inventory must be submitted electronically. The email with which this letter is included constitutes our timely CAO emissions inventory submittal.

In preparing this inventory we employed best engineering knowledge to generate an estimate of the 2018 emissions of the toxics listed in OAR 340-245-8020, Table 2. The time provided to prepare the inventory was limited and we have endeavored to do the best job possible while meeting the rule deadline. However, we reserve the option to revise these estimates as additional information becomes available.

Included with this transmittal is a Form ED601 identifying all of our categorically insignificant activities. To the best of our knowledge at this time, these constitute our Exempt TEUs.

Please note that our 2018 emissions are not necessarily representative of our projected future emissions. ENTEK has implemented facility improvements at the same time that we shifted to monitoring our emissions with new certified continuous emissions monitors. As a result, we have not included an estimated potential to emit for the facility. At this time we anticipate demonstrating risk based on our 2018 actual emissions estimate and proposing a risk limit based on the factors stated in OAR 340-245-0110(2)(b). This approach is subject to change as additional information becomes available.

Please do not hesitate to contact me if you have any questions regarding our inventory.

Very truly yours,

A handwritten signature in blue ink that reads "Kirk R. Hanawalt".

Kirk Hanawalt