



# Oregon

Kate Brown, Governor

Department of Environmental Quality  
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Certified Mail

March 4, 2019

Entek International LLC  
250 Hansard Ave.  
Lebanon, OR 97355

Dear Kim Medford,

This letter provides written notice to you in accordance with OAR 340-245-0050 that Entek International LLC, DEQ Air Quality Source Number 22-6024, has been called in to the Cleaner Air Oregon program.

Governor Kate Brown created the Cleaner Air Oregon program in 2016. The goal of CAO is to better understand emissions of toxic air contaminants and evaluate potential health risks to people near commercial and industrial facilities that emit regulated toxic air contaminants, communicate those results to affected communities, and if needed, reduce those risks to below health-based standards.

Your facility identified above must perform a risk assessment in accordance with the rules adopted by the Environmental Quality Commission. This assessment will require you to provide information about current and potential emissions (e.g., production activities, emissions units, and control devices). This information will be used in conjunction with other data about where your facility is located to estimate risks to the surrounding community as required under Oregon Administrative Rules (OAR 340-245-0050(1)(a)),

*(a) When notified in writing by DEQ, at DEQ's discretion, the owner or operator of an existing source with an operating permit must either demonstrate that it is an exempt source or:*

*(A) Assess risk from the source using any of the Level 1 through Level 4 Risk Assessment procedures in sections (8) through (11);*

*(B) Assess risk from the source using the emissions inventory submitted under OAR 340-245-0040(1); and*

*(C) Follow the applicable calculation procedures under OAR 340-245-0200.*

DEQ will review and approve information submittals for the CAO permitting process, including the emissions inventory, modeling protocol, risk assessment work plan (if you plan to complete a Level 3 or Level 4 risk assessment) and the risk assessment itself. Once the risk assessment is complete and approved, the Risk Action Levels in OAR 340-245-8010 determine whether additional action is required.

22-6024 Entek International LLC

## Next Steps

- Submit the CAO Pre-Application Fee form (AQ100CAO) with payment of the Call-In Fee by April 3, 2019, as identified in OAR 340-245-0400(3). The CAO Call-In fee associated with your Title V permit is \$10,000.
- Submit the CAO Emissions Inventory form (AQ405CAO) by June 2, 2019 (OAR 340-245-0030(1)(a)). For most facilities, this emissions inventory will be more detailed than the toxic air contaminant emissions inventory submitted in 2017 because it will include information about maximum daily emissions as well as annual average emissions. If you wish to complete additional testing this may affect submittal deadlines.

Information about CAO permitting, including the forms mentioned above and a flow chart showing the risk assessment process can be found on the “Cleaner Air Oregon Risk Assessment Process and Forms” tab at <https://www.oregon.gov/deq/aq/aqPermits/Pages/CAO-reg.aspx>.

Your contact for CAO risk assessment work is:

JR Giska, CAO Program Engineer

(503) 229-5178

[giska.jonathan@deq.state.or.us](mailto:giska.jonathan@deq.state.or.us)

We would like to meet with you to start the emissions inventory and risk assessment process and answer any questions you may have. Please contact DEQ at your earliest convenience to schedule a meeting to discuss next steps. We look forward to working with you.

Sincerely,



Keith Johnson

Cleaner Air Oregon Program Manager

(503)229-6431

email: [Johnson.keith@deq.state.or.us](mailto:Johnson.keith@deq.state.or.us)

Cc: JR Giska, DEQ CAO program engineer  
Ali Mirzakhali, DEQ AQ Administrator  
Claudia Davis Regional AQ Manager  
Karen White-Fallon Regional AQ Permit Staff  
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