



October 24, 2019

**BY EMAIL**

Keith Johnson ([johnson.keith@deq.state.or.us](mailto:johnson.keith@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: Follow-Up to Meeting**

Dear Keith:

Thank you for meeting with the ENTEK team last week in Salem. We appreciate the opportunity to have a face-to-face meeting to discuss your questions about our inventory. Based on our conversation, we are proposing the following action items in response to the Notice to Correct:

- **Site Visits:** While many DEQ staff have recently visited our facility, we discussed the benefits of having you and several of the other CAO staff come to the site as well. Towards that end we have scheduled a visit for the morning of November 5. Please let us know at your earliest convenience who will be in attendance so we can have their names registered with security. As we understand that you will soon be out of the country, we discussed a separate opportunity for you to tour the facility upon your return in late November. At this time, we have your visit calendared for November 20<sup>th</sup>, but please let us know if we need to adjust or if there will be any other people in attendance.
- **CEMS Data:** Your requested data from our CEMS. We shall provide those data on or before November 8, as requested.
- **Components in TCE service list:** As discussed, we believe that our fugitive emissions attributable to components in TCE service are de minimis. We operate an aggressive Leak Detection and Repair (LDAR) program with the leak threshold 50 times more stringent than that applied in heavily regulated areas such as South Coast Air Quality Management District. Nonetheless, we agreed to provide a component count and emissions quantification methodology to address those components outside of a Permanent Total Enclosure. Because of the substantial effort necessary to ensure an accurate component count, we requested a short

extension for this submittal to December 6<sup>th</sup>. You had also requested P&ID diagrams for the facility which we informed you we do not have and so would not be capable of providing.

- Method 204 certification: Your letter mentioned certification of the production facility Permanent Total Enclosure. We understand that our testing company (Bison Engineering) submitted the testing protocol for the certification on October 14. We understand no further deliverables are required.
- Title V Permit Modification: We had discussed that ENTEK intends to submit a Title V modification application so as to update our VOC PSEL compliance demonstration methodology to employ the Main Stack CEMS and to incorporate emission factors for the components in TCE service. As we noted, using the CEMS for compliance demonstration purposes is consistent with OAR 340-218-0040(4)(b).<sup>1</sup> We expect to submit that application in December and have requested a meeting with Karen White-Fallon to share our proposal in advance of the submission.
- Mass Balance Calculations: DEQ requested that we submit a revised emissions inventory based on the material balance calculations for the 2018 annual reporting year. As discussed, DEQ has repeatedly noted that the material balance did not balance and was not suitable for tracking TCE emissions from the plant. For that reason, ENTEK has spent considerable amounts of money upgrading its CEMS and certifying its Permanent Total Enclosure. This allows us to move away from material balance to the far more accurate CEMS emission tracking. Based on our discussion, we understand that DEQ is not requiring ENTEK to submit any further information at this time regarding the material balance calculations, but that any further discussions will take place when we meet on November 5<sup>th</sup>.
- Warehouse Emissions: You had requested that we submit a revised emissions inventory reflecting any TCE emissions that occur at the western warehouse. As we discussed, the western warehouse is on non-contiguous property and no manufacturing steps occur in the western warehouse. Therefore, we do not believe that it is part of the ENTEK stationary source based on it not being an adjacent facility. Even if the western warehouse were considered part of the manufacturing stationary source, emissions from warehouse activities are explicitly excluded from the definition of categorically insignificant activities per the definition in OAR 340-200-0020. There is no language in the rules that says that categorically insignificant activities only extend to activities that “are not part of the facility’s primary business or production activities” and such a gloss on the rules is directly contradicted by listings such other activities as broke beaters, fuel tanks and log ponds. Including the warehouse activity


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<sup>1</sup> OAR 340-218-0040(4)(b) states: “When continuous monitoring or source test data has previously been submitted to and approved by DEQ for a particular emissions unit, that information **must be used for quantifying emissions**. Material balance calculations may be used as the basis for quantifying emissions when continuous monitoring or source test data exists if it can be demonstrated that the results of material balance calculations are more indicative of actual emissions under normal continuous operating conditions. Emission factors or other methods may be used for calculating emissions when continuous monitoring data, source test data, or material balance data exists if the owner or operator can demonstrate that the existing data is not representative of actual operating conditions”

emissions in the emissions inventory would contradict DEQ's regulations and so we respectfully request that you withdraw that request.

We believe that this letter summarizes all the points of discussion from our meeting and fully addresses the requests posed in your October 8, 2019 Warning Letter. We look forward to working with you as we proceed through the Cleaner Air Oregon process. In the interim, if you have any questions, please do not hesitate to call me. ENTEK has a long history of working closely with DEQ and encourage open communications.

Very truly yours,



Kirk Hanawalt

cc: J.R. Giska ([giska.jonathan@deq.state.or.us](mailto:giska.jonathan@deq.state.or.us))  
Karen White-Fallon ([karen.white-fallon@state.or.us](mailto:karen.white-fallon@state.or.us))

