



Oregon

Kate Brown, Governor

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August 8, 2019

Entek International LLC
250 Hansard Ave.
Lebanon, OR 97355

Ms. Medford,

DEQ appreciates the submittal of the Cleaner Air Oregon Toxic Air Contaminants Emissions Inventory Form AQ405CAO for the Entek International facility in Lebanon, OR. DEQ received your submittal on May 31, 2019 and has completed an initial review.

Based on our initial review, DEQ has identified a number of deficiencies in your May 31, 2019 submittal. According to OAR 340-245-0030(2), DEQ is requesting you submit additional information, corrections and updates to the Emissions Inventory by no later than September 6, 2019.

General Comments:

The cover letter submitted with the Emissions Inventory for this facility states that facility improvements and new continuous emissions monitors may affect future emissions and associated reporting and therefore an estimated potential to emit was not included. The cover letter then describes an anticipated process of establishing Source Risk Limits for this facility.

Pursuant to OAR 340-245-0040(3)(B)(ii)(I), emissions inventories must include:

“Annual production and usage that are used to calculate the Source Risk Limit if the owner or operator chooses to be permitted based on a requested PTE or risk limit”

Furthermore, the methodology used to establish Source Risk Limits under OAR 340-245-0110(2) will be determined by DEQ based on additional assessments, including the results of a completed and approved Risk Assessment performed in accordance with OAR 340-245-0050.

Therefore, the revised Emissions Inventory submittal must include “requested PTE” activity levels and annual usages and the resulting emissions that will be used as the basis for any future proposed Source Risk Limits. In the absence of “requested PTE” activity levels, DEQ will determine Source Risk Limits based on the activity levels reported to DEQ in your 2018 Annual Report.

Specific Comments:

Based upon the initial review, DEQ requires additional information on the following items pursuant to OAR 340-245-0030(2):

1. **EU-1 – Separator Production Lines:** These are the main production lines responsible for the majority of Toxic Air Contaminant emissions from your facility. It appears as though several emissions units involving multiple calculations are combined in the emissions reported from this unit:
 - a. Provide all emissions calculations performed for “Fugitives and non-fugitives”:

- i. Provide any and all background data needed to substantiate these calculations – e.g., studies providing data on TCE remaining in final products.
 - ii. Provide all sources of emissions that are included in “fugitives” – DEQ anticipates this list would include but not be limited to:
 - 1. Breathing/Working losses from tanks, valves, and fittings;
 - 2. Bulk “Loading Rack” for NEU-TRI;
 - 3. Warehouse and staging area; and
 - 4. Trimmed/Wound product staging for transfer to warehouse
 - b. Substantiate the difference between the submitted Trichloroethylene (TCE) emissions of 17.97 tons/yr in this Cleaner Air Oregon Emissions Inventory and the 21.8 tons/yr TCE as provided in the 2018 Annual Report for this facility.
- 2. **EU-2 – Boilers:**
 - a. Boiler EU-2.3 – The following emissions activities were reported for this boiler in the 2018 Annual Report, but were not reported in this submittal. Please include these emissions, or explain the absence of this emissions unit and activities in this submittal:
 - i. 494 MMft³ Natural Gas
 - ii. 5,845 gal Diesel
- 3. **EU-3 – Line Defect Marking System** (reported as EU-1 on EI submittal):
 - a. Explain or correct the designation of this emissions unit relative to the permit.
 - b. Provide calculations for Isopropanol, t-Butyl acetate, and 2-Butanone emissions
 - c. Substantiate the difference between the submitted Isopropanol emissions in this Cleaner Air Oregon Emissions Inventory of 1.83 tons/yr and 2.65 tons/yr as provided in the 2018 Annual Report for this facility.
- 4. **EU-4 – Cut-to-Size/Glass Mat Duraloc Line:**
 - a. Provide additional clarification and information on this process, specifically related to materials used to adhere Fiber Glass Mat to finished product and their associated Air Toxics emissions.
- 5. **EU-5 – PM Controls:**
 - a. BH-23: Identify the composition of PM that is being controlled – e.g., silica emissions
- 6. **Aggregate Insignificant Activities:**
 - a. Provide emissions from the following activities and systems or substantiate their omission from this submittal:
 - i. Smoke Collection Activities (Filter Beds)
 - ii. Oil Cleaning Activities (FB-7A)
 - iii. Mixing Activities (Baghouses)
 - iv. Grey-Trim Collection System (BH-3) – venting location
 - v. Bulk off-loading of Silica & Polyethylene and related materials handling activities
 - vi. Pyrolysis Oven
 - vii. Box Stenciling Ink

Please note the following if you think some or all of this information should be treated as “Confidential Business Information”:

In order for DEQ to exempt Emissions Inventory submittal data not already publicly available, DEQ must obtain the requested emissions information along with verification of this claim in accordance with to OAR 340-214-0130, specifically sub-sections 2(b) and 3(a-e) as follows:

(2) If an owner or operator claims that any writing, as that term is defined in ORS 192.410, is confidential or otherwise exempt from disclosure, in whole or in part, the owner or operator must comply with the following procedures:

(a) The writing must be clearly marked with a request for exemption from disclosure. For a multi-page writing, each page must be so marked.

(b) The owner or operator must state the specific statutory provision under which it claims exemption from disclosure and explain why the writing meets the requirements of that provision.

(c) For writings that contain both exempt and non-exempt material, the proposed exempt material must be clearly distinguishable from the non-exempt material. If possible, the exempt material should be arranged so that it is placed on separate pages from the non-exempt material.

(3) For a writing to be considered exempt from disclosure as a "trade secret," it must meet all of the following criteria:

(a) The information cannot be patented;

(b) It must be known only to a limited number of individuals within a commercial concern who have made efforts to maintain the secrecy of the information;

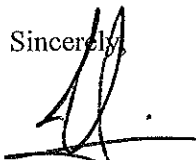
(c) It must be information that derives actual or potential economic value from not being disclosed to other persons; and

(d) It must give its users the chance to obtain a business advantage over competitors not having the information.

(e) It must not be emissions data.

Please communicate any questions or clarifications regarding the above comments proactively in order to provide a timely, revised submittal by September 6, 2019. DEQ remains available during this timeframe to discuss the submittal with you and answer any questions you may have. Failure to provide additional information or corrections required by DEQ may result in a violation of OAR 340-245-0030(1) and OAR 340-245-0040(1).

Once DEQ receives a revised submittal with the requested information, we will complete our review of the Emissions Inventory. Please contact me directly at (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: Keith Johnson, DEQ
Kenzie Billings, DEQ
Claudia Davis, DEQ
Karen White-Fallon, DEQ
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