

From: [KUOPPAMAKI Heather * DEQ](#)
To: [John Browning](#)
Cc: [GISKA JR * DEQ](#)
Subject: EcoLube tank emissions
Date: Wednesday, October 4, 2023 10:26:00 AM
Attachments:

Hey John –

As part of our (ongoing) technical review of the Level 3 Risk Assessment for EcoLube, we realized that the maximum daily working losses calculated for the onsite tanks was done using a method that CAO no longer accepts – i.e., dividing the annual emissions by 365 days.

CAO requires that maximum daily working losses for tanks be calculated using the maximum fill rate and highest liquid surface temperature and vapor pressure. I've attached guidance and a spreadsheet generated by TCEQ that we currently recommend sources use. Please update the emissions inventory and the risk assessment with maximum daily tank working losses using the TCEQ or similar method.

Feel free to call me or set up a time to chat if you'd like to discuss this more.

Thanks,



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