

From: [Travis Quarles](#)
To: [KUOPPAMAKI Heather * DEQ](#)
Cc: [MOORE Chris * DEQ](#); [Eric Spencer](#); [John Browning](#); [Steve Mortesen](#)
Subject: Re: EcoLube tank emissions
Date: Tuesday, February 6, 2024 2:40:07 PM

Heather - thank you for point out the Exempt TEU listing requirement. The revised form you sent is acceptable.

Thanks,

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On Feb 6, 2024, at 2:17 PM, KUOPPAMAKI Heather * DEQ <Heather.KUOPPAMAKI@deq.oregon.gov> wrote:

Hey Travis –

Thanks for updating the AQ520 form. The only additional change necessary is a small one – exempt TEUs need to be listed on Tab 2 of the AQ520 form but the emissions don't have to be estimated on Tab 3. DEQ concurs that the emissions from the antifreeze tanks are not likely to materially contribute to risk and can be considered exempt TEUs. I've added lines 58-63 to the attached AQ520 with the exempt tanks. Let me know if you agree with the proposed changes (added rows) and we can approve the emissions inventory.

Here's the rule citation for listing exempt TEUs:

OAR 340-245-0040(4):

(a) When required to submit an emissions inventory, the owner or operator must submit:

(A) A list of TEUs that emit toxic air contaminants. The owner or operator must include exempt TEUs but does not have to calculate toxic air contaminant emissions from the exempt TEUs. The list of TEUs that emit toxic air contaminants should not be limited to what is listed in a source's operating permit but should include all operations at the source that emit toxic air contaminants;

Thanks -

Heather Kuoppamaki, P.E. | heather.kuoppamaki@deq.oregon.gov | c: 503-407-7596
