



Oregon

Tina Kotek, Governor

Department of Environmental Quality
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May 9, 2024

EcoLube Recovery, LLC
11535 N Force Ave.
Portland, OR, 97217
Sent via email only

Eric Spencer,

DEQ received the submittal of the Cleaner Air Oregon (CAO) Level-3 Modeling Protocol and Risk Assessment Work Plan (MP&RAWP) and Level-3 Risk Assessment (Risk Assessment) for EcoLube Recovery, LLC (EcoLube) on March 15, 2024 and has completed an initial review.

In accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), DEQ has determined that the following additional information, corrections, and updates are required by May 30, 2024, in order to approve the MP&RAWP and Risk Assessment:

1. EcoLube provided additional information regarding the Regenerative Thermal Oxidizer (RTO) stack parameters collected during three recent source testing events. Please use the most conservative stack parameters; from the source testing of the RTO conducted January 26-27, 2022:

Temperature (K)	Stack Velocity (m/s)
478	11.68

2. In both the MP&RAWP and Risk Assessment:
 - a. Table 4-1, the Risk Based Concentrations (RBCs) for residential chronic noncancer risk are labeled as child chronic noncancer risk, and the RBCs for child chronic noncancer risk are labeled as residential chronic noncancer risk. Update Table 4-1 to correctly label the RBCs.
 - b. The reports state that the 22112 version of AERMOD was used for modeling. The current AERMOD version (version 23132) should be used for modeling and the reports should be updated to reflect the use of the current AERMOD version.
 - c. The population of the city of Portland (635,067) should be used for the Risk Assessment. The Risk Assessment used an urban population of 1.9 million, representing a population from all of Multnomah, Washington, and Clackamas counties. Based on EPA guidelines, the population used in the Risk Assessment should reflect the population that might reasonably contribute to the heat island impact, in this case the population of the city of Portland.¹

¹ United States Census Bureau Quickfacts for Portland, Oregon:
<https://www.census.gov/quickfacts/fact/table/portlandcityoregon/PST045222> [accessed 5/8/2024]

3. Exclusive Farm Use (EFU) zoning and Multiple Use Forest District (MUF) zoning in Multnomah County may allow for the siting of residential dwellings; therefore, for tax lots designated as EFU or MUF which do not currently have a dwelling established:
 - a. assess the receptors on those lots as residential and acute exposure locations;
 - b. submit documentation that residential development is prohibited on the land; or
 - c. submit the following to allow for designating those receptors as acute exposure locations rather than residential: (1) [AQ521 Exposure Location Change Request Form](#); and (2) an [AQ522 Exposure Location Change Request Table](#).
4. Total risks in Table 4-3 in the Risk Assessment should be rounded according to [OAR 340-245-0200\(4\)](#).

DEQ is requesting that you submit additional information to complete your Inventory. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in [OAR 340-214-0130](#) to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss this information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of [OAR 340-245-0030\(1\)](#).

If you have any questions regarding this letter, please contact me directly at heather.kuoppamaki@deq.oregon.gov or 503-407-7596, and I look forward to your continued assistance with this process.

Sincerely,



Heather Kuoppamaki, P.E.
Air Toxics Project Engineer

Cc: Eric Spencer, EcoLube Recovery, LLC
Steve Mortesen, EcoLube Recovery, LLC
John Browning, Bridgewater Group
Lisa Ball, DEQ
Chris Moore, DEQ
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