



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Agency Headquarters

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

January 15, 2026

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

Eric Spencer,

DEQ previously approved EcoLube Recovery, LLC's (EcoLube) CAO Emissions Inventory (Inventory) on February 6, 2024, and Level 3 Modeling Protocol, Risk Assessment Work Plan, and Risk Assessment on August 1, 2024. Based on proposed modifications to operations, EcoLube submitted an updated Inventory on December 12, 2025. The Inventory was updated to account for removal of the sulfonation plant and installation of a new WTX Solvent Extraction Plan.

DEQ has reviewed the Inventory and identified additional updates that are needed before approval. In accordance with [OAR 340-245-0030\(4\)\(b\)](#), DEQ is providing EcoLube with a revised deadline for submittal of a revised Inventory. Please submit the information specified below by February 12, 2026.

General Comment

1. CAO has recently published an updated version of the AQ520 form. Since the Inventory was started in the previous version, DEQ will accept the old form for this current revised Inventory; however all future permitting actions requiring a revised Inventory should be completed using the new form. EcoLube may use the new version or continue to use the old version. The new version, along with a detailed instructions manual, is available in Step 2 of the Step-by-Step Guide for Facilities <https://www.oregon.gov/deq/aq/cao/pages/cao-risk-assessment-resources.aspx> and is also available on YDO.
2. EcoLube may choose to revise and submit **supporting calculations** update the emission factors used for the BOILER TEU. Based on manufacturer data provided, the BOILER is rated at approximately 13 MMBtu/hr. Therefore, the emission factors for 10-100 MMBtu/hr natural gas boilers may be used. However, the emission factors for <10 MMBtu/hr boilers that were used are more conservative so EcoLube may elect to keep these values.

Specific Comment

1. Provide the "Emission Calculations Provided by Process Equipment Vendor", referred to in "Tabl_B1b_Vac_Pump_RTO" sheet of the Att_B_ECL_CAO_EI_Calcs_rev2025 workbook (supporting calculations). Provide all calculations conducted in support of the Inventory in Excel or other format that allows DEQ to review the calculations performed.
2. Provide a revised **CAO Emissions Inventory AQ520 form** that includes the updates and revisions required below:
 - a. Regenerative Thermal Oxidizer (TEU TO-01): Update the emissions estimates for the Toxic Emissions Unit (TEU) TO-01 provided in Sheet "3. Pollutant Emissions – EF" to match the calculations in "Tabl_B1_RTO" of the supporting calculations. Specifically, update the emissions estimates for the following toxic air contaminants (TACs):

- i. Phosphorus and compounds (CASRN 7723-14-0)
 - ii. Acenaphthene (CASRN 83-32-9)
 - iii. Acenaphthylene (CASRN 208-96-8)
 - iv. Fluorene (CASRN 86-73-7)
 - v. Naphthalene (CASRN 91-20-3)
 - vi. Acetaldehyde (CASRN 75-07-0)
 - vii. Benzene (CASRN 71-43-2)
 - viii. Formaldehyde (CASRN 50-00-0)
 - ix. Propylene (CASRN 115-07-1)
 - x. Toluene (CASRN 108-88-3)
 - xi. Xylene (mixture) (CASRN 1330-20-7)
 - xii. Ethyl benzene (CASRN 100-41-4)
 - xiii. Hydrogen Sulfide (CASRN 7783-06-4)
 - xiv. Phenol (CASRN 108-95-2)
- b. Fugitive Equipment Leaks (TEU FUG-1): Update the emissions estimates provided for the TEU FUG-1 in Sheet “3. Pollutant Emissions – EF” to match the calculations in “Tabl_B2_Fug” of the Att_B_ECL_CAO_EI_Calcs_rev2025 workbook. Review and update emissions estimates for all reported TACs.
- c. Update the emissions estimates for the TEU BOILER to conform with General Comment 2, if necessary.

DEQ requests 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\(4\)\(b\)](#).

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 Manager

Cc: Chris Moore, DEQ
J.R. Giska, DEQ
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