

June 6th 2022

Kenzie Billings, P.E.

via email: kenzie.billings@deq.state.or.us

Air Toxics Project Manager
Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232-4100

Subject: Ecolube Recovery Permit #26-3021-ST-01 R, Exempt TEUs

Dear Ms. Billings:

This letter in response to your April 12th Categorically Exempt TEUs letter regarding changes to the Cleaner Air Oregon (CAO) rules affecting Exempt Toxics Emission Units (TEUs) and the emissions inventory previously prepared for EcoLube's facility in Portland, Oregon. More specifically the rule changes resulted in fifteen different types of activities that under the original CAO rules were considered exempt TEUs and did not need to be included in a CAO assessment. Those fifteen activities were listed in the "Cleaner Air Oregon Exempt TEU Reporting" guidance document provided with your April 12th Categorically Exempt TEUs letter. Our assessment of those activities and how they may need to be addressed in the previously submitted EI is below. For convenience, each activity listed in DEQ's guidance document along with associated clarifying language is provided in italics followed by the assessment. Our submittal today also includes the requested Form AQ523 – Categorically Exempt Toxic Emission Units.

Based on the TEU activity assessment that was recently completed, Ecolube Recovery does not believe an extension on any data submission related to the TEU activities listed below is necessary. If there is a change due to DEQ's review of information presented below and further EI data is needed, ELR formally requests the TEU EI data be submitted along with the updated Emissions Inventory for CAO. Updated EI inventory submission will occur within 30 days of getting a CAO source test approval letter from DEQ.

1. Maintenance and repair shops & Automotive repair shops or storage garages

Many facilities have equipment or automotive maintenance and repair shops onsite that use materials that may contain TACs; however, usage of these materials may result in little to no TAC emissions, and in cases where TACs are emitted, these emissions may be insufficient to materially increase source risk. Please review the reporting thresholds in the provided appendices.

Ecolube does not perform any automotive maintenance, automotive repair or have any automotive storage garages onsite. Ecolube's facility does include a maintenance and repair shop, but metal arc welding is not conducted there nor are they any solvent-based cleaning products used in parts washer tank systems. ELR maintenance staff does perform some minor hand held grinding activities, which are related to plant repairs needing to be done on an infrequent basis.

II. Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment

DEQ removed this activity in order to ensure that TAC emissions from air handling systems that may be inadvertently releasing fugitive TAC emissions are captured in a source's EI. In most cases sources will have properly identified emissions points in their submitted Process Flow Diagram (PFD) and this change should have negligible impact on their risk assessment.

ELR's air cooling and ventilating system is associated with our office activities and we are not aware of that system being a source of CAO regulated TACs.

III. Process raw water filtration systems

DEQ revised this activity to exempt only 'closed loop' filtration systems in order to include TAC emissions from these activities where appropriate. If you have filtration systems for process water that contain Volatile Organic Compounds (VOCs) please contact DEQ to determine reporting requirements.

This activity does not occur at the ELR facility

IV. Pharmaceutical packaging

DEQ removed this activity to include reporting of TAC emissions from pharmaceutical packing operations, including but not limited to: printing; container sterilization; shipping box adhesives; etc.

This activity does not occur at the ELR facility.

V. Blueprint making

DEQ removed this activity as it nearly obsolete due to the advancement of computer printing technology – this should have no impact on any permitted sources in the CAO program.

This activity does not occur at the ELR facility

VI. Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking

Many facilities perform routine maintenance operations on primary production equipment that incorporate the use of cleaning materials and/or special operating scenarios that may produce TAC emissions – e.g., cleaning paper machines with heated chemical solutions, or cleaning of process furnaces. These types of activities should be reported in the EI. The removal of this CETEU was to ensure appropriate review of the regular maintenance and repair activities performed on primary production equipment or processes. Non-regular and emergency repair activities should not be included in the CAO process.

Ecolube performs hydro blasting on the facility on a biannual basis. No cleaning chemicals are used for this routine process, only water. All material and water that result from this activity are captured in a vacuum truck and our slops tank system. All of this cleaning water is then disposed of offsite as a

nonhazardous material. ELR does not believe the routine maintenance and repair activities are a source of CAO regulated TACs.

VII. Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids & On-site storage tanks not subject to any New Source Performance Standard (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet vehicles

DEQ has developed the following reporting thresholds for including TAC emissions from these TEUs:

1. Report TAC emissions from Underground Storage Tanks storing gasoline if the maximum annual throughput for your facility is >23,000 gallons per year.
2. Report TAC emissions from Above-ground Storage Tanks storing gasoline if the maximum annual throughput for your facility is >8,000 gallons per year.
3. TAC emissions from tanks storing diesel at ambient temperature and pressure do not need to be reported.
4. TAC emissions from tanks storing semi-volatile materials (e.g., lubricants and oils) at ambient temperature and pressure may not need to be reported.

Please consult DEQ if you have tanks storing VOC TACs other than gasoline. Regardless of whether these thresholds are exceeded, please provide the number of tanks, tank capacities, and material throughputs for your facility for DEQ to review.

TAC emissions from storage and process tanks associated with ELR's oil re-refining operations have already been included in our original EI. Our facility also includes a small used oil tank associated with used oil filter cubing operation. Details on this tank are as follows:

Number of used oil tanks: 1

Tank Capacity: 800 gallons

Tank Annual Throughput: 22,000 gallons (approximate)

VIII. Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment

DEQ removed these activities as fugitive TAC emissions from tanks and service equipment for these fluids can be significant emissions at some facilities with extensive use of these fuels. In most cases sources will not need to report emissions from these activities, please confirm with DEQ.

Ecolube only has an underground two-inch standard natural gas line with service from Northwest Natural Gas on the property.

IX. Pressurized tanks containing gaseous compounds

DEQ removed these activities in order to ensure that pressurized tanks containing TACs that may require periodic releases of gases in order to maintain working pressures – e.g., gas cylinders containing highly toxic compounds like chlorine or arsine gas. Report these activities in the EI.

This activity does not occur at the ELR facility.

X. Fire suppression and training

These activities were removed as they were deemed redundant with 'Fire brigade training.' There should be no effect on a risk assessment from this change.

Ecolube's facility uses an on-site water hydrant for fire suppression.

XI. Diesel combustion Emergency Generators

DEQ revised the emergency generator CETEU to require reporting of all diesel combustion TAC emissions from emergency generators at a source, regardless of the total horsepower from these units on-site. In accordance with federal regulations, sources may report up to 100 hours per generator per year as the maximum non-emergency operations allowed under the CAO program for the purposes of performing a risk assessment. DEQ has provided recommendations on reporting TAC emissions from diesel combustion emissions in the FAQs. Emergency generators not combusting diesel may still be considered CETEU's.

This activity does not occur at the ELR facility.

XII. Industrial cooling towers that do not use chromium-based water treatment chemical

DEQ removed these activities as fugitive emissions from mist from these TEUs is common and in some cases, the water may contain anti-corrosion or antimicrobial compounds that contain reportable TACs.

Ecolube does have cooling towers that use chemical treatments for anti-corrosion and antimicrobial purposes. The three chemicals used are FlexPro CL5642 which contains no TEUs, ChemTreat CL49 which contains 5-10% sodium hydroxide a listed TEU, and ChemTreat BL8860 which contains no TEUs. The low concentrations of sodium hydroxide in our cooling water system will completely disassociate and cooling tower drift loss will not be a source of CAO TACs.

XIII. Uncontrolled oil/water separators

DEQ removed these to include reporting of VOCs from oil/water separators in the EI – consult with DEQ on how best to include TAC emissions from this activity.

Ecolube does have two oil water separators (OWS). One OWS handles stormwater runoff from paved parking areas and is below ground. It is approx. 48,000g total capacity. The other small OWS is aboveground and sits within concrete secondary containment. Its purpose is to handle rainwater from tank containment area and is 400 gallons in size. Both OWS' are flow through in design and do not handle any process waters from ELR operations. Presence of petroleum material is insignificant within the separator units.

XIV. Combustion source flame safety purging on startup

This activity was removed as some sources have the potential to emit TAC emissions during these activities, as the flare serves as a control during startup. Please consult with DEQ on how best to include TAC emissions from this activity.

This activity does not occur at the ELR facility.

XV. Broke beaters, pulp and repulping tanks, stock chests and pulp handling equipment & stock cleaning and pressurized pulp washing & White water storage tanks

These activities were removed as the pulping process in the Kraft method requires the significant use of chemicals with VOC TACs. There are established emission factors for VOC TAC emissions from these types of activities (e.g., methanol), and they should be reported in the EI.

This activity does not occur at the ELR facility.

Please contact me directly with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Tanner Smith", written in a cursive style.

Tanner Smith

cc: John Browning, Bridgewater Group

