



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

May 19, 2023

Source Number: 26-3021

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

Tanner Smith,

DEQ has completed its review of the Cleaner Air Oregon (CAO) Modeling Protocol (Protocol) and Level 3 Risk Assessment Work Plan (Work Plan), submitted by Bridgewater Group, Inc. on behalf of EcoLube Recovery, LLC (Source Number: 26-3021) in accordance with OAR 340-245-0050(1). The Modeling Protocol and Risk Assessment Work Plan were submitted on November 22, 2022. DEQ conditionally approves the submittals provided that the following items are addressed in the final Risk Assessment:

1. Designate buildings or areas where employees may be spending time during normal business hours at the following exposure locations as nonresidential adult (worker) exposure locations:
 - a. Portland International Raceway;
 - b. Delta Park – Owens Sports Complex; and
 - c. Heron Lakes Golf Club.
2. Nonresidential adult (worker) risk must be assessed at schools and daycare facilities in addition to nonresidential child risk.
3. The following locations are designated with exposure location receptors that may be inaccurate or unnecessary – in cases where these designations would lead to a more conservative estimate of risk DEQ does not require revision:
 - a. Areas of Hayden Island that appear as commercially zoned are designated as residential;
 - b. The Columbia River has portions designated as residential or worker – these could be considered acute if EcoLube anticipates people spend several hours or more a day in those locations;
 - c. The I-5 cloverleaf is designated worker, which may be unnecessary as roads themselves are excluded from Risk Assessments;
 - d. Smith and Bybee wetlands should be open, not residential;
 - e. Due to receptor spacing, parks further out should be considered in the residential neighborhood and designated as residential, not acute open; and
 - f. Clarify if open areas will be designated as acute exposure locations – this may not be necessary in wildlife areas.
4. In figure 3-4 in the Work Plan the receptor grid is not shown out to ten kilometers even though the text indicates that risk will be modeled to this areal extent – please ensure that the recommended procedures for establishing the modeling domain are followed in the Risk Assessment:

CAO should extend from no less than 2 km and up to 10 km from the facility, but must include all areas where modeled risk is at or above 0.5 in 1 million Excess Cancer Risk, or at a Hazard Index (HI) of 0.5 for chronic and acute noncancer risk.

5. In the equation on page 4-1, the term “E_s” is not defined, while “Q_p” is defined – please clarify if these are intended to be the same parameter, or clearly define each term in the Risk Assessment.
6. No uncertainty analysis was included in the Work Plan – provide this analysis as part of the Risk Assessment.

The next step in the CAO process is to submit a Level 3 Risk Assessment to DEQ 120 days from the issuance of this letter, no later than **September 16, 2023**. Please refer to our [Step-by-Step Guide for Facilities](#) webpage for Risk Assessment resources.

Please contact me directly at 971.337.4102 or JR.giska@deq.oregon.gov if you have any questions. We look forward to your continued assistance with this process.

Sincerely,



J.R. Giska

Oregon DEQ

Cleaner Air Oregon Program Engineer

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