From:	WESTERSUND Joe
To:	FELDON Leah; INAHARA Jill; PALERMO Jaclyn
Cc:	KAUTH Dave; GRUNOW Greg; HNIDEY Emil; artglass2016
Subject:	2nd draft of art glass permanent rulemaking fiscal impact analysis
Date:	Friday, June 03, 2016 5:04:32 PM
Attachments:	art glass permanent rule draft fiscal impact calcs 6-3-2016.xlsx art glass permanent rule draft fiscal impact statement 6-3-2016.docx

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Hi Leah, Jill and Jaclyn,

I've revised the draft fiscal impact statement for the art glass rulemaking, based on comments from the fiscal advisory committee and new information since then.

Biggest changes:

- Calculations and narrative now have facility-specific estimates for Bullseye and Uroboros
- Calculations and narrative now include a range on # of baghouses installed per facility, to reflect uncertainty about the baseline (how many baghouses Bullseye and Uroboros would install due to NESHAP 6S alone).
    - Before, I assumed this rule would cause install of 1 new baghouse per facility. New assumption (# of new baghouses due to this rule):
        - Bullseye, zero to 2
        - Uroboros, zero to 1
        - All the Tier 1s: one new baghouse
- Narrative includes new text about estimating avoided health costs. I still don't quantify it, but mention that OHA is working on Public Health Assessments and reference the Clean Air Act stats a committee member mentioned. David Farrer has offered to review this section on Monday.

Anyway, new draft is attached. I hope to send this to the committee and ask Emil to post to the website at the end of the day on Monday. Let me know if you want to review & if you have any comments.

Thank you!

-Joe

Joe Westersund
Oregon Department of Environmental Quality
811 SW 6th Avenue, Portland, OR 97204
(503) 229-6240 office
westersund.joe@deq.state.or.us
Usual Schedule: 8am - 5pm, M-F