From: WESTERSUND Joe
To: "Chris Winter"
Cc: Abe Fleishman (abef@northstarglass.com); Al Hooton (al@glassalchemy.com); Eric Durrin (ericdurrin@bullseyeglass.com); Jacob Sherman (jdbsherman@gmail.com); Mark Riskedahl (riskedahl@gmail.com); Paul Trautman (ptrautman@gmail.com); artglass2016; HNIDEY Emil
Subject: RE: data for estimating fiscal impact of the art glass rule
Date: Tuesday, May 03, 2016 1:55:32 PM

Hi Chris,

Yes, that's an important point. The goal for this exercise is to estimate the fiscal impact only of the DEQ art glass rule. Facilities subject to NESHAP 6S may have costs they would incur irrespective of the DEQ art glass rule, and those costs should be subtracted out of the fiscal impact estimate we're talking about here.

-Joe

From: Chris Winter [mailto:chris@crag.org]
Sent: Tuesday, May 03, 2016 1:42 PM
To: WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us>
Cc: Abe Fleishman (abef@northstarglass.com) <abef@northstarglass.com>; Al Hooton (al@glassalchemy.com) <al@glassalchemy.com>; Eric Durrin (ericdurrin@bullseyeglass.com) <ericdurrin@bullseyeglass.com>; Jacob Sherman (jdbsherman@gmail.com) <jdbsherman@gmail.com>; Mark Riskedahl (riskedahl@gmail.com) <riskedahl@gmail.com>; Paul Trautman (ptrautman@gmail.com) <ptrautman@gmail.com>; artglass2016 <artglass2016@deq.state.or.us>; HNIDEY Emil <HNIDEY.Emil@deq.state.or.us>
Subject: Re: data for estimating fiscal impact of the art glass rule

Joe -

Thanks for starting this conversation. I think it would also be helpful for the companies to distinguish between costs incurred to comply with the federal 6S NESHAP regulations and DEQ's CAGM regulation.

Chris Winter
Co-Executive Director
Crag Law Center
917 Sw Oak St.
Suite 417
Portland, OR 97205
(503) 525-2725
Fax (503) 296-5454
chris@crag.org

Protecting and sustaining the natural legacy of the Pacific Northwest

> On May 3, 2016, at 1:36 PM, WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us> wrote:

I was asked a good question- if a company provides data for the fiscal impact estimate, can that be kept private, or would it / could it become public? I'll find out and get back to you.

-Joe

From: WESTERSUND Joe
Sent: Tuesday, May 03, 2016 12:11 PM
To: Abe Fleishman (abef@northstarglass.com) <abef@northstarglass.com>; Al Hooton (al@glassalchemy.com) <al@glassalchemy.com>; Chris Winter (chris@crag.org) <chris@crag.org>; Eric Durrin (ericdurrin@bullseyeglass.com) <ericdurrin@bullseyeglass.com>; Jacob Sherman (jdbsherman@gmail.com) <jdbsherman@gmail.com>; Mark Riskedahl (riskedahl@gmail.com) <riskedahl@gmail.com>; Paul Trautman (ptrautman@gmail.com) <ptrautman@gmail.com>
Cc: artglass2016 <artglass2016@deq.state.or.us>; HNIDEY Emil <HNIDEY.Emil@deq.state.or.us>
Subject: data for estimating fiscal impact of the art glass rule

Greetings, Committee Members,

Thank you for being part of this fiscal advisory committee. If you haven't yet, please mark your calendar for our meeting at 9am on Friday, May 27th.

I'm reaching out now to gather data, especially from the 5 glass manufacturing businesses subject to the rule. You're not required to give me any data, but the fiscal impact statement will be a more accurate estimate if you do.

Basically, the goal of this exercise is to estimate the fiscal impact difference between these two scenarios:

> **Scenario 1:** the world if there were no temporary or permanent art glass rule
> **Scenario 2:** the world if the temporary art glass rule is made permanent

The 5 art glass companies may have already done some analysis of how they'll comply with the art glass rule, and how much that will cost. If you're willing to share all or part of that information with me, that would be very helpful. That could be by email or phone, or in person if that would be convenient. A site visit might help me understand how your processes work. (I would be visiting for the purposes of this fiscal impact estimate, and not as an inspector or other role.)

The rulemaking process includes an analysis of the impact on small business, which they define as businesses with 50 employees or less. If you can tell me your # of employees, that will also be helpful.

Please contact me if you have data you'd like to provide.

-Joe

Joe Westersund
Dry Cleaner Program Coordinator
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