From:	WESTERSUND Joe
To:	GARRAHAN Paul; FELDON Leah; DAVIS George; GRUNOW Greg; KAUTH Dave
Cc:	PALERMO Jaclyn; JOHNSON Keith; artglass2016
Subject:	summary of baghouse leak detection meeting
Date:	Tuesday, August 09, 2016 3:05:16 PM

Hi All,

Thank you for the robust discussion about baghouse leak detection systems (BLDS) today. Since Jaclyn and Keith weren't there, I want to make sure they get a good summary of the pros and cons we came up with. A summary is below- please let me know if I didn't do a good job capturing your key points.

Per Leah, Jaclyn will be the ultimate decider on this issue.

-Joe

Q: Should the art glass rule require baghouse leak detection systems (BLDS)?
Could require for all CAGMs or just for Tier 2. Could allow extra time (1 year?) for install.

Facts:

- NESHAP 6S requires BLDS for new (but not existing) furnaces that are subject to that rule.
- EPA comment recommended we require BLDS
- At decision meeting we decided to require BLDS for Tier 2 CAGMs
- BLDS are faster (response time ~seconds instead of ~day) & more sensitive than current requirement (daily pressure drop check)
- Cost to facility approx. $10k to $25k plus install cost, depending on setup and # of baghouses.
    - Estimate based on response by 1 vendor (Auburn Systems). $2,500 per sensor + $5,000 if no existing data system to plug into. Likely 1-2 sensors per baghouse. Estimate includes hardware + software but not install. I (Joe) requested a cost estimate for install too.
- BLDS calibration does not require a source test

Con:

- BLDS was not included in temp rule or in public notice or fiscal impact analysis
    - Risk: facilities may say they weren't given adequate notice
    - Risk: haven't vetted idea with facilities, it's possible there's some technical incompatibility we don't know about. (We do know NESHAP 6S requires it for larger, new furnaces.)
- Adding BLDS after baghouse constructed may be more expensive than if designing with that in mind. Don't have data though.
- Other Oregon facilities aren't required to have BLDS, do we want to require it for these facilities but no others?
- Has added cost to facilities

Pro:

- Rulemaking process allows DEQ to respond to comments and revise the fiscal impact if needed
- Bullseye has one furnace that is potentially a NESHAP 6S new furnace (depending on whether & how much HAP glass they make in that furnace). So BE may already be required to install BLDS on one of their baghouses.
- CAGMs emit HAPs with short-term health impacts and are located near sensitive populations. Early, better leak detection matters more than in other applications.
    - Risk: bags fail at a Tier 2, emitting a burst of metal HAP into the neighborhood. It isn't caught until neighbors complain of visible emissions or the next daily pressure check. DEQ has to explain why it didn't follow EPA's advice.
- Added cost to facility may be offset since we're simplifying baghouse source test requirement.

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