From: WESTERSUND Joe
To: "mcclintock.katie@epa.gov"
Cc: artglass2016
Subject: question re art glass metals emissions calculation
Date: Wednesday, June 01, 2016 3:02:12 PM

Hi Katie,

I'm at DEQ working on a rulemaking for colored art glass manufacturers (CAGMs). Leah Feldon mentioned that you have expertise on glass manufacturing and suggested I ask for your input.

Source testing is a significant part of the compliance cost of the rule. One of the smaller CAGMs suggested that they be allowed to use an alternate, mass balance approach to measuring emissions. Here's the concept they were proposing:

- The metals content of a batch's ingredients is known, and the metals content of the glass products can be cheaply tested.
- A facility could conservatively estimate their emissions by taking in minus out, and assuming everything else was emitted.

In your view, would this be a valid alternate method?

Thank you for any input you'd like to provide. I'm available by phone if it's easier to discuss than to email.

-Joe

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