From:	WESTERSUND Joe
To:	FELDON Leah; PALERMO Jaclyn; GARRAHAN Paul; KAUTH Dave; GRUNOW Greg; DAVIS George; JOHNSON Keith
Cc:	artglass2016
Subject:	art glass rule: decisions left to make
Date:	Wednesday, August 10, 2016 2:06:26 PM
Attachments:	RE timing on glass permits.msg OHA.pdf

Hi All,

After our decision meeting last week there were a few decisions left unmade. Please weigh in with your thoughts below.

1. Should rule apply statewide?
    a. We don't know yet if there are facilities outside Portland that would be above the threshold.
2. Should the rule clarify that facilities can operate after submitting permit application, before DEQ issues the permit?
    a. We had a long and unresolved conversation [email attached] about whether operating before DEQ issues the permit is technically a violation.
3. Since we're changing the source test methods, should we give extra time?
    a. Something like "X days from adoption or 60 days from baghouse install, whichever is later"?
4. Should we change the 24 hour Cr6 health benchmark in the rule from 36 ng/m3 to 5 ng/m3? [OHA comment attached.]

-Joe

Also needing a decision but already discussed: should the rule require a baghouse leak detection system? Jaclyn will decide based on info in previous email chain.

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