From: WESTERSUND Joe
To: DAVIS George; KAUTH Dave; GRUNOW Greg
Cc: artglass2016; PALERMO Jaclyn; JOHNSON Keith
Subject: RE: are there art glass metal HAP emissions that would not be captured by a baghouse?
Date: Tuesday, August 02, 2016 11:26:37 AM

I don't think this is a moot point yet- if (?) an important portion of the pollutants we're worried about isn't filterable, then we need to consider what can be done about that.

George, if we have facilities measure their metals emissions at the baghouse outlet (EPA Method 29, I think you said), do we know whether the source test run length is feasible? I think we'd want detection limits low enough to compare emissions (via modeling) to the ambient benchmarks.

-Joe

From: DAVIS George
Sent: Tuesday, August 02, 2016 9:09 AM
To: WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us>; KAUTH Dave <KAUTH.Dave@deq.state.or.us>; GRUNOW Greg <GRUNOW.Greg@deq.state.or.us>
Cc: artglass2016 <artglass2016@deq.state.or.us>; PALERMO Jaclyn <PALERMO.Jaclyn@deq.state.or.us>; JOHNSON Keith <JOHNSON.Keith@deq.state.or.us>
Subject: RE: are there art glass metal HAP emissions that would not be captured by a baghouse?

I can meet, but I can also suggest an answer to the question:

In the original temporary rules, the testing concept was focused on determining how much chromium III converted to chromium VI. As a result, the rules required testing for Cr VI on the inlet, plus testing for PM to get baghouse removal efficiency, with the idea that we could use the efficiency to determine how much chromium was getting through the baghouse (i.e., inlet concentration time removal efficiency = outlet concentration). In other words, this would be a way to calculate Cr emissions.

Note that one thing the above testing approach wouldn't tell is us is the emissions of the other HAP metals. Big gap.

Two, or hopefully three things have changed in my view: One, the BE source test suggests that 100% of the Cr III converts to Cr VI, no need to pursue that question any more. Two, the BE source test also suggests that the chromium removal efficiency is less than the PM removal efficiency, which suggests to me that we should abandon the use of PM removal efficiency to calculate metals emissions (all metals). Third, I hope we've moved from crisis mode thinking to being able to use actual logic and reasoning as we revise these rules.

So the question is, what do we really need to know? We need to know the emissions of the metals. This suggests abandoning the focused Cr VI testing and moving to a test that gives all of the metals; this approach means assuming 100% of the Cr emitted is as Cr VI, but the BE source test suggests that anyway. Note in this case that baghouse efficiency is not a factor here, we get the emissions directly from the test. There is also a desire to show the baghouse is working that avoids the hyper-expensive efficiency test.

This doesn't directly answer the question below, but basically, if a metal is in the particulate form, the baghouse will control it. As long as the metals test measures all of the metal being emitted, that becomes sort of a moot point.

George

-----Original Appointment-----
From: WESTERSUND Joe
Sent: Monday, August 01, 2016 5:19 PM
To: DAVIS George; KAUTH Dave; GRUNOW Greg
Cc: artglass2016; PALERMO Jaclyn; JOHNSON Keith
Subject: are there art glass metal HAP emissions that would not be captured by a baghouse?
When: Tuesday, August 02, 2016 3:00 PM-3:30 PM (UTC-08:00) Pacific Time (US & Canada).
Where: HQ - Conference Room 7th Floor Library (AT&T Connect online meeting at https://connect9.uc.att.com/service32/meet/?ExEventID=82296240 - Details below)

Hi All,

One of the big-picture questions I'm seeing in the art glass comments is whether our rulemaking strategy (baghouse control for filterable emissions) works for all the metal HAPs.

My understanding is that the Bullseye source test results showed a much lower capture efficiency for Cr6 than for particulate in general. Is that just variation from sampling and testing, or does it indicate there are condensable emissions that a baghouse is unable to capture? Do we have other data we can weigh on this question?

I'd like your thoughts if you're available for a telecon.

-Joe

(Jaclyn and Keith, I saw you're not available at this time, but I wanted to organize a discussion ASAP and just let you know about it.)

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