From:	JOHNSON Keith
To:	WESTERSUND Joe
Cc:	DAVIS George; artglass2016
Subject:	RE: art glass public comment- points we need Keith"s help on
Date:	Wednesday, August 24, 2016 4:48:51 PM

Thanks for the additional context. See below for revision.

From: WESTERSUND Joe
Sent: Wednesday, August 24, 2016 11:53 AM
To: JOHNSON Keith
Cc: DAVIS George; artglass2016
Subject: RE: art glass public comment- points we need Keith's help on

I think the context of the comment was, 'this rule is unnecessary because Bullseye is not the cause of the pollution'. So, I view this comment as relevant to the rulemaking.

Is there data I can use to argue back, 'yes, this rule is needed. Bullseye and other CAGMs do pose a risk'?

-Joe

From: JOHNSON Keith
Sent: Wednesday, August 24, 2016 11:06 AM
To: WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us>
Cc: DAVIS George <DAVIS.George@deq.state.or.us>; artglass2016 <artglass2016@deq.state.or.us>
Subject: RE: art glass public comment- points we need Keith's help on

We didn't really have enough data to know what "ambient" was before they stopped. We only started monitoring after they stopped. I don't think we should respond substantively to a comment that's not about the rules themselves.

From: WESTERSUND Joe
Sent: Wednesday, August 24, 2016 9:59 AM
To: JOHNSON Keith
Cc: DAVIS George; artglass2016
Subject: RE: art glass public comment- points we need Keith's help on

Is it true that ambient concentrations didn't decrease after Bullseye stopped using the metals? I thought they did.

-Joe

From: JOHNSON Keith
Sent: Wednesday, August 24, 2016 8:45 AM
To: WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us>
Cc: DAVIS George <DAVIS.George@deq.state.or.us>; artglass2016 <artglass2016@deq.state.or.us>
Subject: RE: art glass public comment- points we need Keith's help on

Here you go. Neither comment is directly related to the rule language, so my responses are brief.

From: WESTERSUND Joe
Sent: Tuesday, August 23, 2016 5:27 PM
To: JOHNSON Keith
Cc: DAVIS George; artglass2016
Subject: art glass public comment- points we need Keith's help on

Hi Keith,

George and I are working on the public comment response. There are a couple of questions/comments that we'd like your help to respond to.

Would you be willing to draft a response for the two comments below?

-Joe

Comment # (in Joe's spreadsheet)	Comment	DEQ Response
4	The pollution measured around Bullseye may be coming from other sources. DEQ should have collected more wind direction and velocity data. It is likely that metals pollution near Bullseye is actually coming from fly ash used in making cement at the Lehigh Cement facility. There may be other point sources and mobile sources of these pollutants.	Data collected in late 2015 near Bullseye measured significant concentrations of metal HAPs in air. Subsequent air data showed very marked reductions in these HAPs once these materials were taken out of Bullseye's production process and controls were installed. This demonstrates that Bullseye was clearly the source of these significant elevation in air data. DEQ's work to identify and control remaining sources of air toxics around the Bullseye facility is ongoing. Both the Bullseye and Lehigh facility are completing new controls and management practices to address residual elevated hexavalent chromium detections in recent monitoring events.
41	Ambient concentrations didn't decrease after the temp rule was put in place, so the pollution must be coming from other sources.	Concentrations have remained fairly consistent during this time, however Bullseye ceased using metal HAPs well in advance of the enactment of the temporary rules. Therefore, no specific reductions would have been expected. There was one spiking event in May, which again was clearly attributable to Bullseye, which resulted in the implementation of new restrictions above and beyond the temporary rules in order to protect public health.

Joe Westersund
Oregon Department of Environmental Quality

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Usual Schedule: 8am - 5pm, M-F