From: WESTERSUND Joe
To: FELDON Leah; JOHNSON Keith; PALERMO Jaclyn; DAVIS George
Cc: artglass2016
Subject: RE: rulemaking item we need to discuss
Date: Monday, July 25, 2016 5:06:20 PM

OK, if it needs further discussion I'm thinking that needs to happen before Friday, because the deadline for public comments may apply to EPA as well.

There's no time when all 5 of us are available in the next few days. Can this discussion about EPA comments happen on the sidelines of the Tuesday rules team meeting or Wednesday DEQ/OHA tech workgroup?

-Joe

From: FELDON Leah
Sent: Monday, July 25, 2016 4:50 PM
To: JOHNSON Keith <JOHNSON.Keith@deq.state.or.us>; WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us>; PALERMO Jaclyn <PALERMO.Jaclyn@deq.state.or.us>; DAVIS George <DAVIS.George@deq.state.or.us>
Cc: artglass2016 <artglass2016@deq.state.or.us>
Subject: RE: rulemaking item we need to discuss

I agree – my email just said we needed further discussion on those items.

From: JOHNSON Keith
Sent: Monday, July 25, 2016 4:44 PM
To: WESTERSUND Joe; FELDON Leah; PALERMO Jaclyn; DAVIS George
Cc: artglass2016
Subject: RE: rulemaking item we need to discuss

Yes that's what I meant. And, I don't think we are ready to ask for anything just yet from EPA in writing. Further discussion needed.

From: WESTERSUND Joe
Sent: Monday, July 25, 2016 2:45 PM
To: JOHNSON Keith; FELDON Leah; PALERMO Jaclyn; DAVIS George
Cc: artglass2016
Subject: RE: rulemaking item we need to discuss

Keith, I didn't understand what you meant by 'final list'. Is that about expanding the list of 6 metal HAPs?

Leah, you suggested we ask for written comment from EPA on:

- OAR 340-244-9070 when source test for 1 baghouse can be used as representative of others
- testing Cr6 on the outlet

I'd like to also receive comment from EPA on these other key ideas they mentioned:

- their suggested 0.005 gr/dscf source test standard for baghouse testing
- bag leak detection (triboelectric sensors)
- changes to text of OAR 340-244-9090

-Joe

From: JOHNSON Keith
Sent: Monday, July 25, 2016 2:34 PM
To: FELDON Leah <FELDON.Leah@deq.state.or.us>; PALERMO Jaclyn <PALERMO.Jaclyn@deq.state.or.us>; WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us>; DAVIS George <DAVIS.George@deq.state.or.us>
Subject: RE: rulemaking item we need to discuss

I think also the final list will need some explanation, but I don't think this is a EPA issue. It will continue to be an issue in BE's MAO.

From: FELDON Leah
Sent: Monday, July 25, 2016 2:27 PM
To: PALERMO Jaclyn; JOHNSON Keith; WESTERSUND Joe; DAVIS George
Subject: rulemaking item we need to discuss

Testing C6 on the outlet.

In 9070 – the ability to use one source test for any/all baghouses.

These are the two main issues they identified that I think need consideration. (Although others probably also need to be considered, but they seemed to be ones we had already talked about.)

Leah K. Feldon
Special Advisor to the Director
Oregon Department of Environmental Quality
503.229.6408
feldon.leah@deq.state.or.us