From:	WESTERSUND Joe
To:	Abe Fleishman (abef@northstarglass.com); Al Hooton (al@glassalchemy.com); Amanda Jarman - Eastside Portland Air Coalition (amanda@fundraisingnerd.com); Chris Winter (chris@crag.org); Eric Durrin (ericdurrin@bullseyeglass.com); Jacob Sherman (jdbsherman@gmail.com); Mark Riskedahl (riskedahl@gmail.com); Paul Trautman (ptrautman@gmail.com)
Cc:	artglass2016; INAHARA Jill; PALERMO Jaclyn; FELDON Leah
Subject:	FYI- public comment period for proposed permanent art glass rule starts today
Date:	Wednesday, June 15, 2016 4:19:26 PM

Greetings, Committee Members,

I wanted to let you know that, as planned, DEQ is opening the public comment period for the proposed art glass permanent rule today.

The Notice of Rulemaking includes many but not all of your suggestions, and in particular we're requesting public comment on 3 possible changes to the rule based in large part on your feedback:

- Should the rule be modified to apply to sources that make less than 10 tons per year of colored art glass? If so, what threshold would be appropriate? If proposing a new threshold, what is the scientific/risk based rationale for the change?
- Should the rule be modified to apply statewide, rather than only in the Portland AQMA?
- The temporary rule requires control devices be shown to capture at least 99.0% of incoming particulate matter. DEQ has received indications that, for some facilities, capturing enough particulate matter to show compliance with the 99.0% requirement may require an unmanageably long source test. DEQ seeks comment on whether replacing the 99.0% capture efficiency standard with an emissions standard at the control device outlet would be appropriate for Tier 1 or all facilities and if so, what emissions standard should be chosen. DEQ is considering a control device outlet particulate matter emission standard between 0.001 and 0.01 gr/dscf (grains per dry standard cubic foot of air) based on a range of emissions standards in federal air toxics rules.

It may not be clear how the 3rd bullet point relates to the committee's comments, but it's there to get input on an idea to give facilities more certainty about source test run length and cost. That's something that some committee members requested at the end of the first meeting.

You (and anyone else that would like to) can see the Notice of Rulemaking document and submit comments on the rule online by going to:
http://www.oregon.gov/deq/RulesandRegulations/Pages/2016/Rartglass2016.aspx

Thank you again for your input as members of the committee.

-Joe

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