From:	GARRAHAN Paul
To:	WESTERSUND Joe
Cc:	artglass2016; DAVIS George
Subject:	RE: draft staff report language re sources of HAPs near Bullseye
Date:	Tuesday, September 13, 2016 8:20:11 AM

Looks good.

Paul Garrahan
Oregon Department of Justice
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503.929.7553 (Mobile)

From: WESTERSUND Joe [mailto:joe.westersund@state.or.us]
Sent: Monday, September 12, 2016 5:29 PM
To: GARRAHAN Paul
Cc: artglass2016; DAVIS George
Subject: draft staff report language re sources of HAPs near Bullseye

Hi Paul,

There was a part of the staff report responding to comments about whether high concentrations measured near Bullseye were in fact coming from Bullseye. We made some changes based on your comment that our choice of words might get us involved in the class action lawsuit. What do you think of the new draft language below?

-Joe

Updated draft:
Comment: Other facilities

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.

Response

Data collected in late 2015 near Bullseye measured elevated concentrations of glass-making HAPs in air. Subsequent air data showed reductions in these HAPs once these materials were taken out of Bullseye's production process and controls were installed. This demonstrates that Bullseye was a contributing source. DEQ's work to identify and control remaining sources of air toxics around the Bullseye facility is ongoing.

Comment: Ambient concentrations

Ambient concentrations didn't decrease after the temporary rule was put in place, so the pollution must be coming from other sources.

Response

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.

Joe Westersund
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