From: WESTERSUND Joe
To: KAUTH Dave; DAVIS George; GRUNOW Greg; EISELE Michael
Cc: INAHARA Jill; FELDON Leah; artglass2016; PALERMO Jaclyn
Subject: clarifying required source test length for art glass rule
Date: Thursday, June 02, 2016 4:32:49 PM

Hi All,

At a fiscal advisory committee meeting for the permanent art glass rulemaking, the CAGMs present mentioned that they felt a lot of uncertainty about the source test requirements in the rule. Specifically, about how long each source test run would be required to be.

Is there a consensus that I can relay back to the CAGMs at the next advisory committee meeting?

From talking with David Monro and Katie McClintock, I heard these suggestions:

- If testing the 99% capture efficiency for a baghouse, three 1-hr runs may be enough. You just need enough PM coming in so that you can show that 'out' is less than 1% of the 'in', considering method reporting limits. No need to have the test last for an entire batch.
- If testing for metal emissions (Tier 2s testing chromium emissions or Tier 1s doing source test + model instead of a control device), emissions may vary in an unknown way over the course of a batch. So, the source test run needs to last for an entire batch. Katie suggested that if the stack includes multiple furnaces, perhaps a shorter source test run could still be representative if for example 1/3 of the furnaces were at the start of a batch, 1/3 were in the middle, and 1/3 were at the end of a batch during the source test run.

Those are the ideas I heard- what is DEQ requiring for the CAGM source testing?

If there is info I can relay to the CAGMs on the committee, I think it would be very appreciated by them. It would also help me with my fiscal estimate.

Thank you for any info you can provide,

-Joe

Joe Westersund
Oregon Department of Environmental Quality
811 SW 6th Avenue, Portland, OR 97204
(503) 229-6240 office
westersund.joe@deq.state.or.us
Usual Schedule: 8am - 5pm, M-F