From:	TROUPE Cindy
To:	KAUTH Dave; WESTERSUND Joe; MCMORRINE Edith; GRUNOW Greg
Cc:	artglass2016; INAHARA Jill
Subject:	RE: your input requested: permit fee estimates for art glass plants
Date:	Tuesday, May 24, 2016 11:12:59 AM

Cool thanks for adding that detail!

From: KAUTH Dave
Sent: Tuesday, May 24, 2016 11:12 AM
To: TROUPE Cindy; WESTERSUND Joe; MCMORRINE Edith; GRUNOW Greg
Cc: artglass2016; INAHARA Jill
Subject: RE: your input requested: permit fee estimates for art glass plants

The Simple ACDP annual fee is based on the source category **and** actual emissions. The glass facilities will not fall in a category that is eligible for the Simple Low fee, so will be subject to the Simple High annual fee if they are required to get an ACDP

Dave

From: TROUPE Cindy
Sent: Tuesday, May 24, 2016 11:01 AM
To: KAUTH Dave; WESTERSUND Joe; MCMORRINE Edith; GRUNOW Greg
Cc: artglass2016; INAHARA Jill
Subject: RE: your input requested: permit fee estimates for art glass plants

Joe, the ACDP fee structure you first mentioned below is based upon the source receiving a Standard ACDP permit.

It sounds from Dave's emails if these sources are issued an ACDP permits, then it would be a ACDP Simple permit and not a ACDP Standard permit. The application fee of $7200 + the first annual fee @high fee of $4608; the ACDP Simple permit has a fee that can change between a high fee ($4608)/low fee ($2304) based on their yearly emissions.

Cindy

From: KAUTH Dave
Sent: Tuesday, May 24, 2016 10:49 AM
To: WESTERSUND Joe; MCMORRINE Edith; TROUPE Cindy; GRUNOW Greg
Cc: artglass2016; INAHARA Jill
Subject: RE: your input requested: permit fee estimates for art glass plants

Joe,
60 tons/year would probably be as good a number as any for fee estimation purposes. I would expect that to be on the high end, especially once they get particulate controls installed and PM emissions approach 0 tons/yr.

Uroboros has signed an MAO that indicates they are going Title V, but I haven't heard anything specific one way of the other from them; the last I heard they were still evaluating their options

(ACDP, Title V, shutdown, ??). Uroboros would likely have lower emissions than Bullseye due to fewer furnaces and capacity, but they aren't currently permitted so I don't have annual report info from them.

Dave

From: WESTERSUND Joe
Sent: Tuesday, May 24, 2016 10:41 AM
To: KAUTH Dave; MCMORRINE Edith; TROUPE Cindy; GRUNOW Greg
Cc: artglass2016; INAHARA Jill
Subject: RE: your input requested: permit fee estimates for art glass plants

Great info, thank you!

If I take 15 + 39 + 4 = 58, round that up to 60 tons/year, would that be a decent estimate for Title V emissions fee purposes?

Any updates on whether Uroboros will be on a Title V or ACDP?

-Joe

From: KAUTH Dave
Sent: Tuesday, May 24, 2016 10:32 AM
To: WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us>; MCMORRINE Edith <McMorrine.Edith@deq.state.or.us>; TROUPE Cindy <TROUPE.Cindy@deq.state.or.us>; GRUNOW Greg <GRUNOW.Greg@deq.state.or.us>
Cc: artglass2016 <artglass2016@deq.state.or.us>; INAHARA Jill <INAHARA.Jill@deq.state.or.us>
Subject: RE: your input requested: permit fee estimates for art glass plants

Joe,
You are correct on the Title V application fee (no cost), annual base fee and annual emission fee based on current rule.
Based on the 2014 annual report from Bullseye, actual emissions were about 30 tons (PM10, SO2, NOx), so they may have to pay on permitted for PM10 and NOx (15, 39 tons/yr are generic levels); SO2 could be calculated by material balance (fuel sulfur content), or may have a PTE number for fee purposes (actual SO2 for 2014 was about 4 tons).

My understanding is that we are planning on issuing **Simple** ACDPs to those sources that don't require or request a Title V. Simple ACDP application fee is $7200 and annual fee is $4608

Dave Kauth
ODEQ NWR AQ
700 NE Multnomah St., Suite 600
Portland, OR 97232
Office: 503-229-5053

Fax: 503-229-6945

From: WESTERSUND Joe
Sent: Tuesday, May 24, 2016 10:02 AM
To: MCMORRINE Edith; TROUPE Cindy; GRUNOW Greg; KAUTH Dave
Cc: artglass2016; INAHARA Jill
Subject: your input requested: permit fee estimates for art glass plants

Hi All,

I'm working on a fiscal impact analysis for a rulemaking for the colored art glass manufacturers (CAGM).

I want to have an accurate estimate of the DEQ permitting fees. Can you help me fill in the blanks, and see if the #s I've got sound right?

Title V fees (my understanding is that Bullseye will need a Title V due to NESHAP 6S, and Uroboros may as well.)
One-time fees:

- Application fee: $0 ????

Annual fees:

- Annual base fee: $7,910
- Annual emissions fee: $59.81 per ton
    - Estimated tons: ????

ACDP fees (my understanding is that Trautman, Northstar and Glass Alchemy would all be on 'standard' ACDPs. Same for Uroboros if it does not need a Title V.)
One-time fees:

- Application fee: $14,400

Annual fees:

- Annual base fee: $9,216

I appreciate any help you can give in getting these estimates right. I hope to send out a revised fiscal at the end of the day today.

-Joe

Joe Westersund
Dry Cleaner Program Coordinator
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