From:	WESTERSUND Joe
To:	FELDON Leah; PALERMO Jaclyn; JOHNSON Keith; DAVIS George; artglass2016; GARRAHAN Paul
Subject:	art glass decisions
Start:	Thursday, August 25, 2016 3:30:00 PM
End:	Thursday, August 25, 2016 4:30:00 PM
Location:	HQ - Conference Room 11 (AT&T Connect online meeting at https://connect9.uc.att.com/service32/meet/?ExEventID=82296240 - Details below)
Attachments:	InterWiseEvent.vcs InterWiseEvent.ics

[Leah said she could be available at this time. Jaclyn, how about you?]

Items for discussion:
1. How do we address the large # of rule changes we're making since the public notice?
a. changes:
i. Called out in public notice:
1. Grain loading instead of 99% capture efficiency
2. Statewide
a. Different compliance dates for Portland vs other areas
3. 5 tpy applicability threshold
ii. Based on comments
1. Baghouse leak detection [EPA]
2. new Cr6 daily limit (5 ng/m3 instead of 36 ng/m3) [OHA]
3. Method 29 on outlet (instead of on inlet) [Bullseye]
4. Add more metals /elements to list [EPAC etc]
a. Different compliance dates for new metals/elements
5. More definition of raw material and cullet [Chris Mini]
iii. Other changes, not called out in public notice or suggested in comments (doesn't automatically mean they're not worth doing)
1. Different compliance dates for new facilities
2. Reorganized definition of CAGM
3. More detail about chromium usage rates
4. Once a Tier 1/Tier 2, remain one until drop down to 1 tpy
5. Specifics about when facility becomes Tier 1 or Tier 2 (end of month in which exceeds 12-month threshold)
6. Mechanism for compliance extension
7. Language about apply vs obtain permit (clarify permit timing issue, make distinction between new vs existing sources)
8. Remove 340-244-9060, it's redundant
9. Add option for HEPA filter
10. Allow 90 days to source test, instead of 60
11. Remove word 'uncontrolled' in 340-244-9090 in case emissions from controlled furnace cause unacceptable risk
b. Options:
i. leave rule changes as is, explain why
ii. scale back changes to rule language
iii. additional comment period
2. Add other materials to glassmaking HAPs list? Add selenium and cobalt only, if OK by Paul. Maybe beryllium too?
a. 'uranium' or 'radionuclides'?
b. antimony, beryllium, mercury?
c. Others from table below or elsewhere?
3. Do we require baghouse leak detection systems?
a. HEPA filter as alternative to triboelectric sensor?
b. Options
i. grain loading only
ii. grain loading test or BLDS or HEPA
iii. grain loading test + (BLDS or HEPA)
iv. BLDS + (grain loading or HEPA)
v. HEPA or (grain loading + BLDS)
vi. HEPA if feasible, otherwise (grain loading + BLDS)

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