From:	WESTERSUND Joe
To:	DAVIS George
Cc:	artglass2016
Subject:	interpretation of 10 tpy threshold
Date:	Monday, August 01, 2016 11:11:48 AM

Hi George,

I got a call from Al Hooton at Glass Alchemy. He was asking about the interpretation of the 10 tons/year applicability threshold:

> *OAR 340-244-9000(2) Manufacture 10 tons per year or more of colored glass using raw materials that contain any of the following metal HAPs: arsenic, cadmium, chromium, lead, manganese and nickel.*

Al pointed out that there may be some ambiguity in that sentence. Let's say that a CAGM makes 6 tpy of glass containing arsenic, and 6 tpy of glass containing cadmium. Are they subject?

Al also said that he did some calculations and verified that yes, Glass Alchemy's production levels are above the MAMU that they proposed. They would be subject if the thresholds they proposed were adopted.

-Joe

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