From: INAHARA Jill
To: WESTERSUND Joe; DAVIS George
Cc: artglass2016
Subject: RE: info for art glass permanent rule fiscal impact
Date: Monday, May 02, 2016 5:56:36 PM

Joe,
I'm afraid I can't answer most of these questions……sorry, George!

As far as permit costs, Edie McMorrine [(503) 229-5582] in NWR can help you out with those numbers. Just tell them that these smaller Tier 1 sources would need to apply for a Standard Air Contaminant Discharge Permit. I'm not sure if she can help you with the Title V permitting costs….might need to ask Cindy Troupe (5159) because our Title V permit fee guy is brand new.

Here is some info on the Title V fees:

> **340-220-0030**
>
> **Annual Base Fee**
>
> (1) DEQ will assess an annual base fee of $7,787 for each source subject to the Oregon Title V Operating Permit program for the period of November 15, 2014 to November 14, 2015.
>
> (2) DEQ will assess an annual base fee of $7,910 for each source subject to the Oregon Title V Operating Permit program for the period of November 15, 2015 to November 14, 2016, and for each annual period thereafter.
>
> **340-220-0040**
> **Emission Fee**
> (1) DEQ will assess an emission fee of $58.88 per ton of each regulated pollutant emitted during calendar year 2013 to each source subject to the Oregon Title V Operating Permit Program.
> (2) DEQ will assess an emission fee of $59.81 per ton of each regulated pollutant emitted during calendar year 2014 and for each calendar year thereafter to each source subject to the Oregon Title V Operating Permit Program.
> (3) The emission fee will be applied to emissions based on the elections made according to OAR 340-220-0090.

The emission fees will be low because emissions from Bullseye and Uroboros shouldn't be that high but we can't estimate that until we know what their emissions are. Edie can give you Bullseye's current ACDP but Uroboros doesn't have one.

Good luck!
Jill

From: WESTERSUND Joe
Sent: Monday, May 02, 2016 5:34 PM
To: INAHARA Jill; DAVIS George

Cc: artglass2016
Subject: info for art glass permanent rule fiscal impact

Hi Jill and George,

I'm starting on the art glass permanent rule fiscal impact statement. It sounds like I need to compare these two situations:

- Scenario 1: Costs if no temp or permanent art glass rules adopted (and current DEQ/EPA NESHAP 6S applicability interpretation)
- Scenario 2: Costs if permanent art glass rule adopted (and current DEQ/EPA NESHAP 6S applicability interpretation)

Before I reach out to the 5 companies involved for their input, is there data DEQ already has that you can forward to me? Data that would be helpful:

- How many employees each company has
- How many total furnaces they have
- How many of those furnaces are subject to NESHAP 6S
- Other info about furnace throughput, which furnaces use metal HAP, which ones use chrome
- Who is my best contact for estimating permitting costs?
    - Bullseye and Uroboros if subject to NESHAP 6S will already be required to get Title V. Just need to estimate incremental additional permitting cost from art glass rules
    - Other 3 wouldn't need any permit without this rule, will now be required to get ACDP. Need to estimate total cost of new ACDP

Thank you for any info you can forward.

-Joe

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