From:	WESTERSUND Joe
To:	PALERMO Jaclyn; FELDON Leah; JOHNSON Keith; DAVIS George; GARRAHAN Paul
Cc:	ORMAN Michael; EISELE Michael; KAUTH Dave; GRUNOW Greg; artglass2016
Subject:	discussion re CAGM baghouse source testing requirements
Start:	Monday, July 18, 2016 11:00:00 AM
End:	Monday, July 18, 2016 12:00:00 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

Hi All,

In our discussions about edits to the art glass permanent rule, there's a topic that might need an earlier decision: the baghouse source testing requirements.

The problem
The current rule requires that baghouses show they meet 99% removal efficiency. If a non-detect value is counted at the detection limit, that means the test needs to be run until the inlet conc is 100x the detection limit. Unfortunately, the dilute air streams mean long, expensive tests, especially for Tier 1 facilities. (Northstar said a test company quoted them $350k for a test, with three ~8 day test runs.) At our meeting on 7/6 we agreed this needs changing and talked about setting a grain loading standard (gr/dscf at baghouse outlet) but we haven't yet worked out the details.

Is a near-term fix needed?
My understanding is that Tier 1s have to install the baghouse by 10/1 and submit a source test plan within 30 days of baghouse install. (See timeline below). If we take no action until the EQC votes on the permanent rule (first week of October) then facilities that want to know what source testing will be required have to wait until mid-September to install their baghouse in order to not run afoul of source testing requirements.

Purpose of this meeting:
* How should the rule ensure baghouses work? Decide on specific rule language & #s if possible.
o Grain loading standard: XX gr/dscf at outlet of baghouse
o I'd like to re-open the conversation about alternate ideas
* "other test as approved by DEQ"
* Keep 99% standard but
* change treatment of non-detect values at inlet or outlet
* or, allow surrogate PM to be injected for test
* use manufacturer specs for bags
* Can we/should we act before October EQC on source testing changes?
o Temp rulemaking to change the source testing requirement earlier
o Enforcement discretion to give longer than 60 days to source test (so they could wait for finalized source test standard)
o Other administrative action / agreement?

-Joe

Tier 1 facilities
deadline latest date action
9/1/2016 9/1/2016 apply for ACDP
- - DEQ issues ACDP
15 days before install begins 9/16/2016 submit Notice of Intent to Construct the baghouse
10 days after NOIC submitted 9/26/2016 DEQ gives permission to construct (permission is given by default if no DEQ response)
10/1/2016 10/1/2016 install baghouse
30 days before conducting the source test 10/31/2016 submit source test plan to DEQ
60 days after commencing operation of baghouse 11/30/2016 source test baghouse

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