From:	WESTERSUND Joe
To:	"eric@uroboros.com"
Cc:	artglass2016
Subject:	draft fiscal estimate for art glass permanent rulemaking
Date:	Tuesday, May 31, 2016 5:33:50 PM
Attachments:	art glass permanent rule draft fiscal impact calcs 5-31-2016.xlsx

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Hi Eric,

I've incorporated the data you gave me today along with data from others to try to estimate Uroboros' compliance cost for this rulemaking. My new draft spreadsheet is attached, and your feedback is welcome.

The idea is to compare the impact if the EQC approves the proposed rule (and makes the current temporary art glass rule permanent) vs if the EQC disapproves, and the temporary rule expires. NESHAP 6S would exist either way, so we're trying to tease out only the additional impact over and above NESHAP 6S.

For the 'high' estimate for Uroboros, I took the 'high' numbers you gave me, including contingency, and assumed the 1 baghouse was installed 100% because of this rule. For the 'low' estimate, I assumed the 1 baghouse was going to be installed because of NESHAP 6S anyway, so there are no baghouse costs attributed to this DEQ rule. I'm thinking reality is somewhere in between.

These are rough estimates, but the goal is to have something useful for the public when they comment and for the EQC when they vote.

Feel free to send me comments, or to call me up and talk through them that way. I'll be in regular hours tomorrow, 8-5.

-Joe

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