From:	WESTERSUND Joe
To:	PALERMO Jaclyn; FELDON Leah; JOHNSON Keith; DAVIS George; GARRAHAN Paul; ORMAN Michael; EISELE Michael; KAUTH Dave; GRUNOW Greg
Cc:	artglass2016
Subject:	summary of today"s meeting re CAGM baghouse source testing
Date:	Monday, July 18, 2016 4:22:05 PM

Hi All,

Thank you for participating in the meeting this morning. Here's my summary:

- We agreed that the current standard (99% capture efficiency test) needs changing for Tier 1 facilities and possibly for Tier 2s. It's impracticably long and costly because their emissions are very dilute. (Northstar said they were quoted $350k, with 8-day test runs.)
- We talked about two ways to replace the 99% standard:
  - Specify a grain loading standard at the baghouse outlet. Source test would be cheaper & test run length would be predictable. (Emissions must be < X gr/dscf at baghouse outlet.)
  - Specify design specs for the baghouse filter media. (Baghouse filter media must be designed to capture > Y% of particulate at particle size > Z microns.)
    - This could also include a requirement for periodic leak inspection with fluorescent leak detection powder (aka dye test). Temp rule requires facility to inspect for leakage, doesn't specify how.
- We discussed the time crunch that facilities face. The temp rule requires source test within 60 days of commencing operation of the control device, and source test plan submitted at least 30 days before that. Tier 1s would need to install the baghouse before Oct 1 deadline but not too early, so the 30/60 days is after the EQC meeting.
- Initially, I thought we might need to address this before the EQC considers the permanent rule (currently scheduled for October 3rd, could possibly be moved up).
  - To do that, we'd need to modify the temporary rule, perhaps to extend the 60-day timeframe for source testing.
  - This could be a big lift and is not the preferred option.
- We thought of an option that doesn't require changing the temp rule.
  - If facilities install baghouses after 8/4 (60 days before 10/3), their source test would not be due until after the EQC considers the permanent rules.
    - The permanent rule could specify a grain loading standard and extend the timeframe to comply. (Perhaps "within 60 days of commencing operation of the emission control devices, or 60 days after the approval or this rule, whichever is later, test control device….")
    - If the permanent rule specifies baghouse design specs, then no source testing is needed for those facilities, so they could cancel their plan to source test. (Hopefully, they would have installed something that meets the design spec).
  - They'd incur a risk in doing this, since the EQC meeting could be delayed or the EQC could decide not to approve the proposed rules.
  - If the baghouse were installed before 9/3 (30 days before 10/3) then the source test

plan deadline becomes a factor, and facilities might either decline to submit a source test plan, or submit one with 'subject to change if source test requirements change in permanent rule'.

- If we're comfortable with the plan not to change the temp rule, we have time. We can consider any public comments that touch on this issue, and we have until late August to:
    - 1) decide whether to use grain loading standard or design specs,
    - 2) decide whether that would apply only to Tier 1 or to all facilities
    - 3) decide on the detailed language of the spec.

Ugh, that was long. Thanks to any of you still reading.

I'll schedule a followup meeting to discuss some of these issues. Please let me know if there are important bits I got wrong or didn't capture.

In the meantime, please gather any data that could help us with decisions #1-3.

Thanks!

-Joe

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