From:	DAVIS George
To:	WESTERSUND Joe; GRUNOW Greg; FELDON Leah; PALERMO Jaclyn; GARRAHAN Paul; KAUTH Dave; JOHNSON Keith
Cc:	artglass2016
Subject:	RE: art glass rule: decisions left to make
Date:	Thursday, August 11, 2016 11:55:13 AM

Joe et al.,

The original 99% removal efficiency requirement was put in to prove that the baghouse was working well. (As an aside, I and others still believe this isn't necessary, but it's in the temp rules anyway).

Because of the excessive cost involved in testing for 99% removal efficiency, we have discussed other options, like the grain loading limit – again an attempt to prove that the baghouse is working well. A low PM grain loading means the baghouse is working well, which also means it isn't leaking.

So what does a BLDS do? It looks for leaks. A lack of leaks means the baghouse is working well. So a BLDS can serve the same purpose as the PM grain loading source test.

So either one works for the purpose of showing the baghouse is working well and isn't leaking. Neither is entirely perfect, either. Neither will show a baghouse plugging, so pressure drop monitoring is still useful for that.

And for what it's worth, I am completely opposed to requiring both a source test and a BLDS. In my opinion that is unnecessary, duplicative and an unjustified additional cost to small companies that are already spending a fortune to comply.

This is not related to M29 or other chromium limits testing, that has a different purpose and a BLDS would tell us nothing about chromium.

George

From: WESTERSUND Joe
Sent: Thursday, August 11, 2016 11:30 AM
To: DAVIS George <DAVIS.George@deq.state.or.us>; GRUNOW Greg <GRUNOW.Greg@deq.state.or.us>; FELDON Leah <FELDON.Leah@deq.state.or.us>; PALERMO Jaclyn <PALERMO.Jaclyn@deq.state.or.us>; GARRAHAN Paul <Paul.GARRAHAN@state.or.us>; KAUTH Dave <KAUTH.Dave@deq.state.or.us>; JOHNSON Keith <JOHNSON.Keith@deq.state.or.us>
Cc: artglass2016 <artglass2016@deq.state.or.us>
Subject: RE: art glass rule: decisions left to make

Hi George,

Thank you to you and Greg for responding.

The idea to let a BLDS substitute for source testing is new to me, could you give some more thoughts

on that?

- Would BLDS substitute for the grain loading source test, or the Method 29 test that Tier 2s have to do to set Cr usage limits?
- From your perspective, is BLDS a good enough substitute for a source test? I'm thinking a source test demonstrates that the equipment as installed is effective (is the baseline performance OK), and a BLDS qualitatively monitors for changes from the baseline (is it starting to break). So I was thinking you'd want source testing plus BLDS, or if that's too expensive to require then perhaps just the source testing.

-Joe

From: DAVIS George
Sent: Thursday, August 11, 2016 9:47 AM
To: GRUNOW Greg <GRUNOW.Greg@deq.state.or.us>; WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us>; FELDON Leah <FELDON.Leah@deq.state.or.us>; PALERMO Jaclyn <PALERMO.Jaclyn@deq.state.or.us>; GARRAHAN Paul <Paul.GARRAHAN@state.or.us>; KAUTH Dave <KAUTH.Dave@deq.state.or.us>; JOHNSON Keith <JOHNSON.Keith@deq.state.or.us>
Cc: artglass2016 <artglass2016@deq.state.or.us>
Subject: RE: art glass rule: decisions left to make

My thoughts:

1. Should rule apply statewide?
    a. We don't know yet if there are facilities outside Portland that would be above the threshold.

    I agree that the rule should apply statewide, but I don't feel strongly about it.

2. Should the rule clarify that facilities can operate after submitting permit application, before DEQ issues the permit?
    a. We had a long and unresolved conversation [email attached] about whether operating before DEQ issues the permit is technically a violation.

    I am proposing language in the rule to resolve this issue.

3. Since we're changing the source test methods, should we give extra time?
    a. Something like "X days from adoption or 60 days from baghouse install, whichever is later"?

    Two thoughts: first, I think BLDS should be made an option, that is, either source test or install BLDS. Second, and particularly if this option is chosen, a little more time should be given to install the BLDS, and might as well give the same amount of time for the source test so sources have time to make an informed decision.

4. Should we change the 24 hour Cr6 health benchmark in the rule from 36 ng/m3 to 5 ng/m3? [OHA comment attached.]

    Yes.

George

From: GRUNOW Greg
Sent: Thursday, August 11, 2016 8:51 AM
To: WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us>; FELDON Leah <FELDON.Leah@deq.state.or.us>; PALERMO Jaclyn <PALERMO.Jaclyn@deq.state.or.us>; GARRAHAN Paul <Paul.GARRAHAN@state.or.us>; KAUTH Dave <KAUTH.Dave@deq.state.or.us>; DAVIS George <DAVIS.George@deq.state.or.us>; JOHNSON Keith <JOHNSON.Keith@deq.state.or.us>
Cc: artglass2016 <artglass2016@deq.state.or.us>
Subject: RE: art glass rule: decisions left to make

My two cents below…

From: WESTERSUND Joe
Sent: Wednesday, August 10, 2016 2:06 PM
To: FELDON Leah; PALERMO Jaclyn; GARRAHAN Paul; KAUTH Dave; GRUNOW Greg; DAVIS George; JOHNSON Keith
Cc: artglass2016
Subject: art glass rule: decisions left to make

Hi All,

After our decision meeting last week there were a few decisions left unmade. Please weigh in with your thoughts below.

1. Should rule apply statewide?
    a. We don't know yet if there are facilities outside Portland that would be above the threshold.

    The rule should apply statewide. We are acting to regulate this industry group because we identified there is significant potential of health based risks for individuals with exposure to the uncontrolled emissions that result from these facilities. People throughout the state should be able to expect the same concern from DEQ for their health and welfare as individuals living in the Portland Metro area. The potential for health based risks is associated with the category of sources that we are working to regulate; it is not exclusive to the Portland Metro area. The rule contains specific criteria that triggers its applicability. If such facilities exist elsewhere in the state they should fall subject to the rule. If there are no other such facilities outside the Portland Metro area, the rule should still be made to be effective statewide so any new facility constructed elsewhere is constructed to meet the criteria of the rule.

2. Should the rule clarify that facilities can operate after submitting permit application, before DEQ issues the permit?
    a. We had a long and unresolved conversation [email attached] about whether operating before DEQ issues the permit is technically a violation.

    I think clarifying this in the rule is the easiest way to resolve this issue.

3. Since we're changing the source test methods, should we give extra time?
    a. Something like "X days from adoption or 60 days from baghouse install, whichever is

later"?

Joe, I do think we should allow extra time and I like the example language you've proposed.

4. Should we change the 24 hour Cr6 health benchmark in the rule from 36 ng/m3 to 5 ng/m3? [OHA comment attached.]

   I would defer to OHA on this and make the indicated change if we/Paul can conclude that it was sufficiently addressed in the public notice to allow the change.

-Joe

Also needing a decision but already discussed: should the rule require a baghouse leak detection system? Jaclyn will decide based on info in previous email chain.

Joe Westersund
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