

## Art Glass Rulemaking Decision Meeting 8/4/2016

Updated 8/15/2016

Text highlighted in green is a change we agreed to make at the 8/4 meeting.

Text in yellow is a decision made after the 8/4 meeting

Text in red is a decision that still needs to be made.

Decisions to make:

1. Should we replace the 99.0% baghouse source test requirement?
  - a. 0.005 gr/dscf PM at outlet? [\[EPA comment\]](#)
    - i. For Tier 1 and Tier 2
    - ii. Including non-filterable emissions? **no**
  - b. Method 29 metals at outlet?
    - i. If we require Method 29, do we set limits based on the results?
      1. Require Tier 2s to source test + model + set usage limit for other metals, not just Cr? **no**
  - c. Should we update the Cr source test requirements for Tier 2s?
    - i. Require Cr test on outlet, instead of baghouse inlet
    - ii. By default use Method 29 & assume all Cr is Cr6. Facility has option to use Method 0061 to differentiate Cr3 and Cr6 if desired.
    - iii. Require facility to report full Method 29 list if doing Method 29
2. Should we change the 10 tpy applicability threshold?
  - a. "Tier Zero" from 1-10 tpy? [George]
    - i. Register only?
    - ii. Baggouse but no source test?
  - b. Set threshold based on metal raw material usage (lbs/year) [\[Glass Alchemy comment\]](#)
  - c. George's proposal
    - i. 5 tpy threshold
    - ii. Statewide registration if using >1 lb/year of metal HAP raw materials **no**
3. Require [\[triboelectric\]](#) baghouse leak detection systems? [\[EPA comment\]](#)
  - a. Could require for Tier 2 facilities only (that was the initial decision at the 8/4 meeting)
  - b. Could decide not to require them, and say that monitoring pressure drop & inlet temp is enough (per Dave & Greg)
  - c. Could allow facilities to choose either grain loading source test or BLDS install (per George)
4. Should we add additional metals to list?
  - a. Cobalt and selenium (w added time to comply?)
  - b. All Method 29 metals?
  - c. Other metals?
5. Should we make the rule apply statewide? **Yes apply statewide, per Jaclyn after 8/15 phone call w Keith Andersen (WR)**
  - a. Are there facilities outside PDX that would be subject?
6. Clarify permit timing issues
  - a. Facilities can operate after submitting permit app, before DEQ issues permit?
7. Source test timing
  - a. If source test methods changed above, give "60 days from adoption or 60 days from baghouse install, whichever is later"?
8. Should we update the 24 hour Cr6 health benchmark in the rule to 5 ng/m3? [\[OHA comment\]](#)

9. Remove word 'uncontrolled' from 340-244-9090(1)