STOEL RIVES LLP

760 SW Ninth Ave., Suite 3000
Portland, OR 97205
T. 503.224.3380
F. 503.220.2480
www.stoel.com

THOMAS R. WOOD
*Direct 503.294.9396*
tom.wood@stoel.com

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**VIA MESSENGER**

Oregon DEQ
Attn: Joe Westersund
811 SW Sixth Avenue
Portland OR 97204-1390

**Re: Art Glass Permanent Rulemaking 2016**

Dear Mr. Westersund:

Thanks you for the opportunity to comment on the proposed permanent art glass rule. I am writing out of concern for the impact that the proposed language will have on small Tier 1 art glass manufacturers. Proposed OAR 340-244-9070(1) requires that emission control devices used to meet this rule achieve minimum 99.0% removal efficiency for particulate matter as measured by EPA Method 5 or equivalent method approved by DEQ. This requirement in and of itself is reasonable as a fabric filter or cartridge filtration unit should be capable of meeting this requirement. However, proposed OAR 340-244-9070(2)(h) requires that a Tier 1 art glass manufacturer perform inlet and outlet testing on the control device using DEQ Method 5. This rule language poses several problems.

First, the control efficiency requirement is properly stated in 9070(1) relation to EPA Method 5 which evaluates filterable particulate. However, 9070(2)(h) states that testing must use DEQ Method 5. There is no basis for requiring testing under 9070(2)(h) using DEQ Method 5 which includes condensable particulate. 9070(2)(h) should require testing using EPA Method 5.

Second, the rule is not clear as to the point of the testing required by 9070(2)(h). If the test is intended to document the removal efficiency, then the rule needs to say so. If the point of the test is simply to generate data on what the pre- and post-control emissions are, then the rule should say that.

Third, if the point of the 9070(2)(h) test is to document the removal efficiency, then the requirement is unworkable. Many of the small Tier 1 art glass manufacturers emit very little particulate pre-control. Once that particulate is passed through a control device meeting 99.0+% control efficiency, it will be reduced to nearly nothing. Obtaining the 7 mg minimum sample

mass required under the Oregon Source Sampling Manual (Section 2.8.b) on the inlet, let alone the outlet, of the control device would require a length of test run that for all practical purposes is impossible.

For these reasons, we encourage DEQ to revise the rule to specify that a source test of the control device is required under 9070(2)(h), but specify that it is an EPA Method 5 test with run time capped at 2 hours or 31.8 dscf sampling volume, whichever is shorter. If that length of test run does not generate enough particulate on the filter to be measurable, then the control device has clearly been demonstrated to be performing its job.

Please contact me if you have any questions about this comment.

Sincerely,

Thomas R. Wood

TRW:nh