To: Pope, Anne[Pope.Anne@epa.gov]; Fairchild, Susan[Fairchild.Susan@epa.gov]; Dagseth, Renee[Dagseth.Renee@epa.gov]; Froikin, Sara[Froikin.Sara@epa.gov]
From: McClintock, Katie
Sent: Fri 2/19/2016 3:13:45 PM
Subject: RE: TRI question on glass

Thanks Anne –

That is great. It will be great to see the summary you have. It is too bad we don't have more info on the EFs. For instance I noticed that both owens Brockway in portland and ardagh in seattle report lead but use very different efs. Owens is 0.06 and Ardagh is 0.10. It could definitely be possible that they add and therefore emit different amounts, but it sounds like we will have to go to the source to get that info.

From: Pope, Anne
Sent: Friday, February 19, 2016 4:30 AM
To: Fairchild, Susan <Fairchild.Susan@epa.gov>; McClintock, Katie <McClintock.Katie@epa.gov>; Dagseth, Renee <Dagseth.Renee@epa.gov>
Subject: RE: TRI question on glass

Susan, Renee and Katie,

Ex. 6 - Personal Privacy

I downloaded an provided summary data for all art glass facilities reporting to TRI based on the list of 16 facilities. I did not include calculation method in the download.

TRI provides information on the following.

•□□□□□□□□ Whether substance is imported; produced as a product/byproduct/impurity; used as

a reactant/formulation component/article component, in repackaging, as chemical or manufacturing processing aid or other use; etc.

•□□□□□□□□ Maximum amount onsite – code is used

•□□□□□□□□ The basis of each estimate (stack air, fugitive air, water, land releases) – code is used

The maximum amount onsite is not usage but could provide additional useful information. You could combined info about production/import/usage with max amt onsite to try and glean additional information about the chemical.

I went online but could not find the emission factor in TRIME material.

AP-42, WebFIRE and the Cr Locating and Estimating document that are cited as tools on TRIME web page do not have any Cr efs from glass manuf. These 3 TRI guidance references are OAQPS documents/tools. In the 90s, the TRI office developed efs for the TRI program if efs were not available from OAQPS. OAQPS did not review the TRI efs. SPPD's group that is responsible for ef development is checking to determine if ef exists in TRIME and the basis of the ef.

It could be that a PM ef was used by TRI staff in conjunction with the old SPECIATE database. The PM efs in AP-42 and WebFIRE date back to the early-mid 1980s.

Thanks

Anne

From: Fairchild, Susan
Sent: Thursday, February 18, 2016 3:56 PM
To: McClintock, Katie <McClintock.Katie@epa.gov>; Dagseth, Renee <Dagseth.Renee@epa.gov>; Pope, Anne <Pope.Anne@epa.gov>

Subject: RE: TRI question on glass

Ann leaves at 2:30 pm ET but is scheduled to be at work tomorrow (Friday). I have left her a message for first thing in the AM and I hope she and I will have a chance to chat before you get in.

I can be reached tomorrow at Ex. 6 - Personal Privacy or by email at this address.

Susan Fairchild

Senior Environmental Scientist

(919) 541-5167

USPS Address:

OAQPS/SPPD/MMG

Mail Code D 243-04

Research Triangle Park, NC 27711

From: McClintock, Katie
Sent: Thursday, February 18, 2016 3:32 PM
To: Fairchild, Susan <Fairchild.Susan@epa.gov>; Dagseth, Renee <Dagseth.Renee@epa.gov>; Pope, Anne <Pope.Anne@epa.gov>
Subject: TRI question on glass

Ardagh glass in Seattle is using chromium compounds and is reporting 910 pounds of chromium emissions based on a tri emission factor of 0.28 lbs (not sure if per ton). This raises serious concerns because this will undoubtedly be much more than the color glass manufacturers are using/emitting. I have a few questions for you both our your shops:

1. Have we pulled tri reports for other container manufactures? Is this part of your screaning?

2. How are they calculating emissions? If they are provided by the TRI system, what is the basis?

3. Do they report total usage in addition to emissions (or calculate retained sulfur)?

Katie McClintock

Air Enforcement Officer

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