To: McClintock, Katie[McClintock.Katie@epa.gov]
Cc: Narvaez, Madonna[Narvaez.Madonna@epa.gov]
From: Fairchild, Susan
Sent: Fri 2/5/2016 6:22:40 PM
Subject: RE: Heads up on emerging issue in PDX.
BIN 3 Final Rules.pdf
TRI-report 2005 zero releasers see p 76.pdf
Phone and emails with glass mfrs between prop and final.pdf
Characterization of the Glass Manufacturing Industry for SSSSSS.pdf

Katie, as we discussed, I am attaching some background information on glass manufacturing and on the Bullseye plant in OR, specifically.

1- The 2005 TRI report indicates that Bullseye was a 'zero releaser'. 2nd attachment

2- After proposal, these guys came out of the woodwork as facilities that would have been impacted adversely by the rule. They called and met with us. That is memorialized in the 3rd attachment.

3- Listing of glass manufacturers, process descriptions, and an overview of the industry. While artisans were grouped with the pressed and blown (P&B) glass group, no P&B manufacturers were known to exist in OR. 4th attachment.

4- Final rule, with excerpt below with relevant comment. 1st attachment

From 72 FR 73180 (final rule for Part 63 Subpart SSSSSS)

From p. 73186:

B. Area Source NESHAP for Glass Manufacturing

1. Definition of Source Category

Comment: Three commenters from companies that make stained glass commented that they own small

facilities that operate, with one exception, small periodic furnaces (pot furnaces) that are charged with small amounts of the glass manufacturing metal HAP. They claim that their furnaces would be subject to the emission standards because they use the metal HAP

and exceed the 45 Mg/yr (50 tpy) threshold. However, these companies allege that the costs of installing controls on their furnaces could put them out of business. One commenter stated that some artisans and schools also would be subject to the proposed rule based on the applicability criteria. Two of the commenters suggested that the rule exempt small businesses due to the burden that would result from complying with the proposed requirements. One commenter stated that the rule was based on an analysis of the glass manufacturing

industry using data on large continuous furnaces that did not account differences in the manufacturing process and emissions associated with stained glass manufacturing. The commenter stated that the rule should exempt periodic furnaces.

Response: After reviewing the emissions inventory in support of the listing decisions made pursuant to sections 112(c)(3) and 112(k) and

available information, we have concluded that the glass manufacturing area source category was listed based on emissions from relatively large manufacturing plants that operated continuous glass furnaces. Periodic furnaces were not included in the inventory.

The 45 Mg/yr (50 tpy) threshold that was proposed was meant to define the source category to include only these large manufacturers, but did not properly reflect this criterion. Therefore, we have revised § 63.11448 to specify that periodic or pot furnaces are not subject to the final Glass Manufacturing Area Source NESHAP. We believe this revision will address most of the concerns of the stained glass

manufacturing sector as well as other sectors and organizations, such as artisans, schools, studios, and other small facilities that produce glass using periodic furnaces.

Susan Fairchild

Senior Environmental Scientist

(919) 541-5167

USPS Address:

OAQPS/SPPD/MMG

Mail Code D 243-04

Research Triangle Park, NC 27711

From: Cortelyou-Lee, Jan
Sent: Thursday, February 04, 2016 4:23 PM
To: Fairchild, Susan <Fairchild.Susan@epa.gov>
Subject: Re: Heads up on emerging issue in PDX.

Thanks Susan. I will share

Sent from my iPhone

On Feb 4, 2016, at 4:12 PM, Fairchild, Susan <Fairchild.Susan@epa.gov> wrote:

Hi Jan, I'm sending this to you because this is in the news, and it may involve my rule- glass manufacturing.

I'm in the loop with Madonna Narvaez, and we are going to try to figure out if the glass plant (Bullseye)--which they believe to be the source of both cadmium and arsenic emissions-- is regulated by the Glass manufacturing GACT standard (this is an area source rule, GACT = generally available control technology)

If it is, the most recent permit, which I have received from Madonna, does not reflect the requirements of the Glass GACT rule.

As I've mentioned to Madonna, the article is misleading regarding the NESHAPs for Glass manufacturing.

Susan Fairchild

Senior Environmental Scientist

(919) 541-5167

USPS Address:

OAQPS/SPPD/MMG

Mail Code D 243-04

Research Triangle Park, NC 27711

From: Narvaez, Madonna
Sent: Thursday, February 04, 2016 2:14 PM
To: Fairchild, Susan <Fairchild.Susan@epa.gov>
Subject: FW: Heads up on emerging issue in PDX.
Importance: High

Hi, Susan. When ODEQ conducted the monitoring for the School Air Toxics Initiative, cadmium showed up. They were able to do additional monitoring to try to determine the source of the cadmium emissions. At the time, it looked as if the glass company might have been the source, but the additional monitoring was not conclusive. Recently, the FS had developed a monitoring method using moss, and those results are just coming out. I saw that Bullseye was on the original list of potential sources when the area source rule was being developed. I am trying to find out if the facility produces 50 tons per year of glass, which would mean that they need to get a Title V permit.

This is the article that was published in the Portland Mercury:
http://blogtown.portlandmercury.com/BlogtownPDX/archives/2016/02/03/arsenic-cadmium-levels-near-two-se-portland-schools-are-alarmingly-high-state-finds

This is the discharge permit I have been able to find:
http://www.deq.state.or.us/nwr/permits/26-3135-P-041511-AQ.pdf

Are you in tomorrow? Would you have some time to talk about this? Thanks!

From: Hastings, Janis
Sent: Thursday, February 04, 2016 10:56 AM
To: Dossett, Donald <Dossett.Donald@epa.gov>
Cc: Bray, Dave <Bray.Dave@epa.gov>; Narvaez, Madonna <Narvaez.Madonna@epa.gov>
Subject: Fw: Heads up on emerging issue in PDX.

Don, could you or Madonna give your OAR contacts a heads up by forwarding to them the news articles. Let them know that the Region is working this issue, which has just come to our attention this week. We are in the process of looking at what actions make sense, and we will keep HQ-OAR informed.

Scott Downey is working through Paul Koprowski to find out if the state or EPA emergency response might be taking any immediate action.

Please copy Dave and me.

Thanks!

Jan

From: Holsman, Marianne
Sent: Thursday, February 4, 2016 10:46 AM
To: McLerran, Dennis; Pirzadeh, Michelle; Dunbar, Bill
Cc: Hastings, Janis; Smith, Judy; Downey, Scott
Subject: Heads up on emerging issue in PDX.

OCE and AWT are working on a hot issues write up on this and we are going to draft a reactive desk statement for press calls. I understand we are talking with ODEQ today on this matter. Stand by for more information. There are several other clips on this as a result of a DEQ news release of yesterday (attached).

http://www.portlandmercury.com/BlogtownPDX/archives/2016/02/03/arsenic-cadmium-levels-near-two-se-portland-schools-are-alarmingly-high-state-finds

	State Finds Alarmingly High Arsenic, Cadmium Levels Near Two SE Portland Schools

www.portlandmercury.com

GoogleA portion of the Bullseye Glass facility in SE Portland Within days, state officials are slated to release the alarming results of a monitoring program...

State Finds Alarmingly High Arsenic, Cadmium Levels Near Two SE Portland Schools

Posted by Daniel Forbes on Wed, Feb 3, 2016 at 2:06 PM

Ex. 4 - copyright

Ex. 4 - copyright

Ex. 4 - copyright

Ex. 4 - copyright

Daniel Forbes is the author of **Derail this Train Wreck**. *He lives in Portland, and can be reached at ddanforbes@aol.com.*

Marianne Holsman

Public Affairs Director

EPA Region 10

Desk: 206-553-1237

Cell: 206-450-5895

Follow us!

<image003.png> <image004.png> <image008.png>

<NRmetalsSEPortland-Final.docx>