To: McClintock, Katie[McClintock.Katie@epa.gov]
Cc: Scott Throwe[Throwe.Scott@epa.gov]
From: Fairchild, Susan
Sent: Fri 2/5/2016 7:54:15 PM
Subject: RE: saw that spectrum was listed as a caller, do you know much about them?
BIN 3 Final Rules.pdf

Katie, I think we need to involve OECA and I've copied Scott Throwe on this email.

Scott, Region 10 found in their school monitoring program elevated levels of cadmium and arsenic

Ex. 5 - Deliberative Process

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I have included relevant excerpts from the final preamble rule here, and attached a copy of the final rule to this email as well.

Comment: Two commenters expressed concern with the definition of affected source (i.e., furnace). Both commenters stated that the definition in the proposed rule, which was adopted from 40 CFR 60, subpart CC, Standards of Performance for Glass Manufacturing Plants (Glass NSPS), defines furnace to include the "raw material charging system" and "appendages for conditioning and transferring molten glass to forming machines." One commenter pointed out that, in the proposed rule, compliance is demonstrated by testing the furnace stack. However, emissions from the "charging system" or "appendages" are not generally ducted to the furnace stack. The commenter stated that furnace was defined as it was in the NSPS to clarify what constitutes a modification; the definition was not meant to identify emission points or where stack testing should be performed. The other commenter explained that one of the company's

plants adds colored frit to the molten glass in the forehearth, which is one of the ''appendages'' referenced in the definition of furnace. The commenter pointed out that emissions from the forehearth are not ducted to the furnace stack. Since the GACT analysis for glass furnaces was based on emissions from furnace stacks, the proposed emission limits should not apply to emissions from forehearths.

Response: In developing the proposed rule, we determined GACT for this source category based on technology used to reduce emissions from glass melting furnace stacks. Glass furnace stacks generally exhaust emissions from the furnace melter, which is the part of the furnace where raw materials are charged and melted. Although furnace stacks may also exhaust emissions from other parts of, or appendages to, the furnace, it was our intent to regulate emissions from the furnace melter. This is consistent with our understanding of the emissions profile of glass manufacturing raw materials; that is, metal HAP are emitted from glass furnaces upon the initial melting step. Later remelting of glass, such as cullet and frit, does not re-emit the metal HAP once the glass has been formed or vitrified. To clarify this requirement, we have revised § 63.11459 of this final rule to redefine the glass melting furnace as the ''* * * process unit in which raw materials are charged and melted at high temperature to produce molten glass.'' In addition, we have added to § 63.11459 a definition of furnace stack as the conduit or conveyance through which emissions from the furnace melter are released to the atmosphere. We also have revised § 3.11452 in this final rule to clarify that compliance with the emission limits is determined by testing the furnace stack.

TABLE 1 TO SUBPART SSSSSS OF PART 63—EM

For each. . .	You must m
1. New or existing glass melting furnace that produces glass at an annual rate of at least 45 Mg/yr (50 tpy) AND is charged with compounds of arsenic, cadmium, chromium, manganese, lead, or nickel as raw materials.	a. The 3-hour block must not exceed (ton)) of glass prod b. The 3-hour block sion rate must not

§ 63.11448 Am I subject to this subpart?

You are subject to this subpart if you own or operate a glass manufacturing facility that is an area source of hazardous air pollutant (HAP) emissions and meets all of the criteria specified in paragraphs (a) through (c) of this section.

(a) A glass manufacturing facility is a plant site that manufactures flat glass, glass containers, or pressed and blown glass by melting a mixture of raw materials, as defined in § 63.11459, to produce molten glass and form the molten glass into sheets, containers, or other shapes.

(b) An area source of HAP emissions is any stationary source or group of stationary sources within a contiguous area under common control that does not have the potential to emit any single HAP at a rate of 9.07 megagrams per year (Mg/yr) (10 tons per year (tpy)) or more and any combination of HAP at a rate of 22.68 Mg/yr (25 tpy) or more.

(c) Your glass manufacturing facility uses one or more continuous furnaces to produce glass that contains compounds of one or more glass manufacturing metal HAP, as defined in § 63.11459, as raw materials in a glass manufacturing batch formulation.

§ 63.11449 What parts of my plant does this subpart cover?

(a) This subpart applies to each existing or new affected glass melting furnace that is located at a glass manufacturing facility and satisfies the requirements specified in paragraphs (a)(1) through (3) of this section.

(1) The furnace is a continuous furnace, as defined in § 63.11459.

(2) The furnace is charged with compounds of one or more glass manufacturing metal HAP as raw materials.

(3) The furnace is used to produce glass, which contains one or more of the glass manufacturing metal HAP as raw materials, at a rate of at least 45 Mg/yr (50 tpy).

(b) A furnace that is a research and development process unit, as defined in § 63.11459, is not an affected furnace under this subpart.

(c) An affected source is an existing source if you commenced construction or reconstruction of the affected source on or before September 20, 2007.

(d) An affected source is a new source if you commenced construction or reconstruction of the affected source after September 20, 2007.

(e) If you own or operate an area source subject to this subpart, you must obtain a permit under 40 CFR part 70 or

40 CFR part 71.

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From: McClintock, Katie
Sent: Friday, February 05, 2016 1:45 PM
To: Fairchild, Susan <Fairchild.Susan@epa.gov>
Subject: saw that spectrum was listed as a caller, do you know much about them?

That is in the seattle area – **Ex. 5 - Deliberative Process**

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http://www.spectrumglass.com/stained-glass/tour/ribbon.asp

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