**From:** ddanforbes@aol.com
**To:** Smith, Judy
**Subject:** Re: Query on Glass Manufacturing Air Rules
**Date:** Tuesday, February 23, 2016 2:59:48 PM
**Attachments:** image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

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Hi Judy:

Thanks for your reply. Essentially, I'm looking for an interpretation of 40 CFR Part 63, "National Emission Standards for HAPs for Area Sources: ... Glass Manufacturing... Final Rule 12/26/07."

Specifically, on page 73182, under the heading "Applicablity," it states that "periodic or pot furnaces"[--which are not necessarily the same thing, so, should that read: "periodic AND pot furnaces??]-- are not part of the source category. The final rule applies only to glass manufacturing plants that operate *continuous* furnaces and use one or more of the glass manufacturing metal HAP as raw materials." [Emphasis added.]

On Page 73201, under 63.11448, EPA states that you're subject to this subpart if you're an area source of HAP emissions and (c) your facility "*uses one or more continuous furnaces*" etc. re HAP. [Emphasis added.]

Page 73206: under 63.11459: "Continuous furnace means a glass manufacturing furnace that operates continuously except during periods of maintenance, malfunction, control device installation, reconstruction or rebuilding."

So, that's the context. Here's my questions, please. And by the way, I asked Oregon DEQ Administrator Dick Pedersen about this issue in Salem at Oregon state Rep. Vega Pederson's hearing this morning, and he deferred the question to his staffer David Monro, his de factor permit manager. Mr. Monro deferred my question to EPA.

Questions, please, and they refer specifically to Bullseye Glass and Uroboros Glass here in Portland, small, art-glass manufacturers, Bullseye with about 20 furnaces, Uroboros with less.

(1.) The two companies' furnaces, my article will state, quoting named industry experts, including a former Uroboros manager, are never shut off once they go on-line. To turn them off severely damages the ceramic lining of the furnaces. So from day one until they 'die,' they are heated continuously at a minimum of 1500 F,

some emissions, by definition, occurring during that 24/7 heating. Does this scenario therefore qualify this furnace as operating in a continuous manner?

(2.) Batch raw material is fed into them daily. The melt, then cooling cycle typically takes some 22-hours a day approximately. After a pause of an hour or two, depending on production needs, new batch is often fed into the same furnace within an hour or two of the molten glass's removal. Does this qualify as a *continuous* furnace?

(3.) Might the quotidian pause be considered part of an ongoing process?

(4.) One of the company's apparently does have an actual product-moving-through it 24/7 furnace to produce *clear* glass. Given that the glass is clear, its main off-gassing is carbon dioxide, not a HAP. What effect does this putative furnace have on qualification as an area source of HAP emissions?

(4.) An easy one: is the 40 CFR Part 63 dated 12/26/07 the most current version and therefore the applicable document?

(5.) Is the identity of the commenters during the public comment period a public record?

So, I do not want an emailed response to this, please, but request rather a phone interview with someone sometime tomorrow morning (2/24/16) to discuss this.

Many thanks,

Daniel Forbes
*The Portland Mercury*
503-477-8888

-----Original Message-----
From: Smith, Judy <Smith.Judy@epa.gov>
To: ddanforbes <ddanforbes@aol.com>
Sent: Tue, Feb 23, 2016 9:22 am
Subject: FW: Query on Glass Manufacturing Air Rules

Apologies if you are receiving this more than once. I left the first "d" off of your e-mail and it keeps bouncing back. Judy

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**From:** Smith, Judy
**Sent:** Tuesday, February 23, 2016 9:18 AM
**To:** 'danforbes@aol.com' <danforbes@aol.com>
**Subject:** Query on Glass Manufacturing Air Rules
**Importance:** High

Hi Daniel –

I'm writing in response to the query you sent to Dennis McLerran last night. I'd like to line up someone on staff in the air program at headquarters to talk with you, but it would be helpful if you can provide us with more specific questions so that we can direct you to the right person. Can you provide me with a list of questions to send up the chain?

Many thanks,
Judy
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Judy Smith, EPA Public Affairs Specialist
Oregon Operations Office
503-326-6994 desk
503-545-2540 cell
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From: ddanforbes@aol.com<mailto:ddanforbes@aol.com> [mailto:ddanforbes@aol.com]
> Sent: Monday, February 22, 2016 2:31 PM
> To: McLerran, Dennis <mclerran.dennis@epa.gov<mailto:mclerran.dennis@epa.gov>>
> Subject: Portland Mercury reporter requests brief interview to clarify interpretation of 40 CFR 63, National Emission Standards for ... Glass Manufacturers
>
> Good Afrtenoon Administrator McLerran:
>
> Daniel Forbes here. I've had some stories on air toxics in The Portland Mercury of late that may have surfaced on your radar.
>
> My deadline looming, I'm currently embarked on an examination of 40 CFR Part 63, "National Emission Standards for HAPs for Area Sources: ... Glass Manufacturing... Final Rule 12/26/07."
>
> I understand you briefed Sens. Wyden and Merkley and Rep. Blumenauer prior to their press conference on 2/18/16.
>
> Please call at your earliest convenience to plumb the depths, however briefly, of 40 CFR Part 63.
>
> Thanks,
>
> Daniel Forbes
> The Portland Mercury
> 503-477-8888