From: Smith, Judy
To: Rob Davis
Subject: Re: Bullseye Glass
Date: Tuesday, March 01, 2016 4:08:14 PM

Hi Rob - The response that we sent to you on 2/11 is still current in regards to Title V. Judy

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From: Smith, Judy
Sent: Thursday, February 11, 2016 4:23 PM
To: Rob Davis
Subject: Response to your inquiry on Title V

Hi Rob – Here is our response to your questions.

To clarify, the Clean Air Act Title V permit program does not apply to art glass facilities such as Bullseye Glass in Portland. This size of facility is regulated under the state permitting program.

EPA and ODEQ work together to ensure that monitoring, permitting and review under the Clean Air Act are sufficient to implement the statute. EPA works with ODEQ to identify the priority work that is needed to accomplish the statutory requirements in the Clean Air Act. The Title V permit program is a fee based program by design, and ODEQ must collect the funds necessary to administer the program. EPA periodically reviews the Title V program to assess whether sufficient funds are being collected to manage to program. EPA and DEQ also collaborate regarding the monitoring network needed for implementation of the National Ambient Air Quality Standards (NAAQS).

Consistent with the Clean Air Act and the implementing regulations, Title V permits are periodically revised to ensure they include all applicable requirements. Such revisions are in addition to the five-year renewal process. Title V permits are often administratively extended beyond their expiration date and the permits remain in effect. Facilities with administratively extended permits must continue to meet the limits of their permits until the permits are reviewed and renewed.

EPA is scheduled to complete a Clean Air Act Title V permit program review for Oregon this year. The two reports you referenced are compliance/enforcement related reviews, called the State Review Framework, which are separate from the Title V program review. The current report for the State Review Framework has been drafted and is now under review. The State Review Framework is a standard review of state compliance and enforcement programs and it has a Clean Air Act component.

Please let me know if you need anything else.

Judy

From: Rob Davis <RDavis@oregonian.com>
Sent: Tuesday, March 1, 2016 11:18 AM
To: Smith, Judy; Skadowski, Suzanne
Subject: FW: Bullseye Glass

Hi Judy, Suzanne:

I'm writing on deadline today about this. Does EPA believe that Bullseye Glass should've been operating under a Title V permit? The company reports producing far more than 50 tons of glass per year. (Please see attached screenshot of DEQ's ACDP showing the company "melts" 2000+ tons of glass a year.)

One potential hiccup here, raised in subsequent emails in the chain, is that the company says it does not operate a continuous furnace.

If the company was operating under a Title V permit, can you tell me what additional level of scrutiny or regulation would've been given to its air emissions?

I'm making the same inquiry of DEQ as well but would like to hear from EPA given that you all raised the issue in the email correspondence below, which I obtained through a public records request.

Thanks in advance for a swift response. I'm at my desk if it's easier, 503.294.7657.

Cheers,
Rob

ROB DAVIS
Reporter
The Oregonian
503.294.7657
@robwdavis

From: "Narvaez, Madonna" <Narvaez.Madonna@epa.gov>
Date: Thursday, February 4, 2016 at 9:48 AM
To: "monro.david@deq.state.or.us" <monro.david@deq.state.or.us>
Cc: "armitage.sarah@deq.state.or.us" <armitage.sarah@deq.state.or.us>
Subject: Bullseye Glass

Good morning, Dave. Can you tell me who the permit writer/inspector is for Bullseye Glass? I am

trying to find out how many tons per year of glass they produce. If it is at least 50, they should have a Title V permit, and I can only find an ACDP for them, thanks!

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Madonna Narvaez
Regional Air Toxics Coordinator
USEPA, Region 10
1200 Sixth Avenue, Ste 900
MC: AWT-150
phone: 206-553-2117
fax: 206-553-0110
narvaez.madonna@epa.gov
Follow @EPAnorthwest on Twitter!https://twitter.com/EPAnorthwest