

DEQ Requests Comments on Trautman Art Glass Proposed Air Quality Permit

DEQ invites the public to submit written comments on the conditions of Trautman Art Glass proposed air quality permit, known officially as a simple air contaminant discharge permit.

Summary

The proposed permit is a new permit for a new facility that will become subject to the colored art glass manufacturing rules after the permit is issued and the facility begins operations.

How do I participate?

To submit your comments for the public record, send them by mail, fax or email:

Air Quality Permit Coordinator
700 NE Multnomah Street
Portland, OR 97232

Fax: 503-229-6945

Email: nwraqpermits@deq.state.or.us

Written comments are due by 5 p.m. Friday
Sept. 22, 2017.

About the facility

Trautman Art Glass is located at 2000 SE 4th Avenue in Canby, OR. Trautman Art Glass operates a small borosilicate colored art glass manufacturing facility, where glass is created by combining raw materials such as silica sand, soda ash and crushed cullet along with other materials containing metals that alter the color and clarity of the glass. The process typically includes crushing clear glass into pieces called cullet. Cullet is combined or "batched" with raw materials using a specific glass product recipe or formula. Each glass formula yields a uniquely colored glass product. Glass batches typically range in size from 30 to 60 pounds.

How does DEQ determine permit requirements?

DEQ evaluates the rules applicable to the type of facility and determines permit requirements according to state and federal regulations.

How does DEQ monitor compliance with the permit requirements?

This permit requires the facility to monitor pollutants using federally-approved monitoring practices and standards.

The permit requires the facility to submit annual production reports and to maintain records demonstrating compliance with permit conditions. DEQ will review annual reports and conduct periodic on-site inspections of the facility to ensure proper operation and record maintenance.

What happens after the public comment period ends?

DEQ will consider and provide responses to all comments received by the close of the comment period. DEQ may modify provisions in the proposed permit, but the permit writers can only modify conditions of the permit in accordance with the rules and statutes under the authority of DEQ. The only way to change rules or statutes is by participating in the rulemaking or the legislative process. Ultimately, if a facility meets all legal requirements, DEQ will issue the facility's air quality.

Where can I get more information?

Find out more and view the application at <http://www.oregon.gov/deq/GetInvolved/Pages/Public-Notices.aspx> or contact the air quality permits coordinator:

Phone: 503-229-5582 or 800-452-4011

Fax: 503-229-6945

Email: nwraqpermits@deq.state.or.us

View the application and related documents in person at the DEQ office in Portland. For a review appointment, call 503-229-5582.

Accessibility information

Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call DEQ in Portland at 503-229-5696, or toll-free in Oregon at 1-800-452-4011, ext. 5696; or email deqinfo@deq.state.or.us

Emissions limits

Criteria Pollutants: All criteria pollutants are expected to be emitted at less than the de minimis rate, so no limits are included in the permit. Plant site emission limits are only established for criteria pollutants that are emitted at greater than the de minimis rate.



State of Oregon
Department of
Environmental
Quality

Northwest Region
Air Quality Program
700 NE Multnomah St.
Ste. 600
Portland, OR 97232

Phone: 503-229-5053

800-452-4011

Fax: 503-229-6945

Contact: David Kauth

www.oregon.gov/DEQ

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Please include your full name and mailing address so that we can remove you from our print mailing list.



State of Oregon
Department of
Environmental
Quality

SIMPLE AIR CONTAMINANT DISCHARGE PERMIT

Department of Environmental Quality
Northwest Region
700 NE Multnomah St, Suite 600
Portland, Oregon 97232
503-229-5263

This permit is being issued in accordance with the provisions of ORS 468A.040 and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Trautman Art Glass, Inc.
2000 SE 4th Avenue
Canby, OR 97013-4371

INFORMATION RELIED UPON:

Application No.: 029093
Date Received: 05/17/17

PLANT SITE LOCATION:

2000 SE 4th Avenue
Canby, OR 97013

LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Canby
Approval Date: 10/07/16

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Michael Orman, E.I.T., Northwest Region Air Quality Manager

Dated

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-8010):

Table 1 Code	Source Description	SIC (NAICS)
Part B, 84.	Sources for which DEQ determines an air quality concern exists - Colored Art Glass Manufacturing (Tier 1 CAGM)	3229 (327212)

TABLE OF CONTENTS

1.0	GENERAL EMISSION STANDARDS AND LIMITS	3
2.0	SPECIFIC PERFORMANCE AND EMISSION STANDARDS	4
3.0	OPERATION AND MAINTENANCE REQUIREMENTS	5
4.0	PLANT SITE EMISSION LIMITS	6
5.0	MONITORING/RECORDKEEPING REQUIREMENTS	7
6.0	REPORTING REQUIREMENTS	9
7.0	ADMINISTRATIVE REQUIREMENTS	10
8.0	FEEES	10
9.0	DEQ CONTACTS/ADDRESSES	11
10.0	GENERAL CONDITIONS AND DISCLAIMERS	12
11.0	ABBREVIATIONS, ACRONYMS, AND DEFINITIONS	14

1.0 GENERAL EMISSION STANDARDS AND LIMITS

- 1.1. Visible Emissions** The permittee must comply with the following visible emissions limit, as applicable:
- a. Visible emissions from any air contaminant source must not equal or exceed an average of 20 percent opacity.
 - b. This visible emissions limit is based upon a six-minute block average of 24 consecutive observations recorded at 15-second intervals as specified in OAR 340-208-0110(2).
 - c. This visible emissions limit does not apply to fugitive emissions from the source.
- 1.2. Particulate Matter Emission Limits for Non-fuel Burning Equipment** The permittee must comply with the following particulate matter emission limits for non-fuel burning equipment, as applicable. This condition does not apply to fugitive emissions sources:
- a. Particulate matter emissions from any air contaminant source installed, constructed, or modified on or after June 1, 1970 but before April 16, 2015 must not exceed 0.14 grains per dry standard cubic foot.
 - b. Particulate matter emissions from any air contaminant source installed, constructed, or modified on or after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot.
- 1.3. Fugitive Emissions** The permittee must comply with the following fugitive emission requirements:
- a. The permittee may not cause or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but not be limited to:
 - i. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
 - ii. Application of water or other suitable chemicals on unpaved roads and other surfaces which can create airborne dusts;
 - iii. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;

- iv. Adequate containment during abrasive blasting or other similar operations;
 - v. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;
 - vi. The prompt removal of earth or other material that may become airborne from paved streets.
- b. For purposes of this condition, fugitive particulate emissions are visible emissions that leave the permittee's property for a period or periods totaling more than 18 seconds in a six minute period.
 - c. Fugitive particulate emissions are determined by EPA Method 22 at the downwind property boundary.
- 1.4. Particulate Matter Fallout** The permittee must not cause or permit the deposition of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person.
- 1.5. Nuisance and Odors** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by DEQ personnel.

2.0 SPECIFIC PERFORMANCE AND EMISSION STANDARDS

- 2.1. Tier 1 Colored Art Glass Manufacturing** The permittee must comply with the following requirements for its Colored Art Glass Manufacturing (CAGM) facility. Refer to OAR 340-244-9010 for definitions of terminology stated in the CAGM associated conditions of this permit.
- a. The permittee is prohibited from manufacturing glass products or their intermediates in an uncontrolled furnace when the products are made with raw materials containing one or more "Glassmaking HAPs."
 - i. "Glassmaking HAP" means arsenic, cadmium, chromium, lead, manganese, nickel or selenium in any form, such as the pure chemical element, in compounds or mixed with other materials.
 - ii. A "controlled" glassmaking furnace is one whose emissions are captured and treated by an emission control device approved by DEQ in accordance with OAR 340-244-9070(2).
 - iii. The permittee is not restricted on the raw materials it uses in electric glassmaking furnaces that are controlled by an emission control device approved by DEQ.

- b. “Frit” is to be considered a raw material in any instance in which the initial melt process from which it is derived did not completely achieve vitrification. Raw Materials have potential to emit if remelted. If complete vitrification has been achieved, the Frit is a finished good without the potential to emit if remelted.
- c. The permittee is prohibited from the following activities unless and until it obtains a new Standard ACDP or Title V Operating Permit that appropriately addresses Tier 2 CAGM rule requirements:
 - i. Using raw materials containing one or more glassmaking HAPs in a fuel-heated glassmaking furnace;
 - ii. Producing 100 or more tons per year (any 12-consecutive calendar month period) of glass using raw materials that contain glassmaking HAPs.
- d. The CAGM rule applicability thresholds (Tier 1= ≥ 5 tons/yr and Tier 2= ≥ 100 tons/yr, of glass manufactured using raw materials that contain glassmaking HAPs...) are based upon total glass product manufactured and includes product that is discarded as waste.

3.0 OPERATION AND MAINTENANCE REQUIREMENTS

3.1. CAGM Baghouse Requirements

The permittee must equip its baghouse control device system as follows:

- a. The baghouse must be equipped with an inlet temperature monitoring device;
- b. The baghouse must be equipped with a differential pressure monitoring device.

3.2. Baghouse Operation

The permittee must observe the following baghouse operation and maintenance requirements:

- a. The permittee must prominently post the differential pressure design specification of the baghouse immediately next to the system’s differential pressure monitoring device.
- b. When replacing baghouse filters the permittee may not substitute a filter with lower control efficiency specifications than the bag design approved by DEQ in its construction review process.

- 3.3. CAGM HEPA Afterfilter Requirements** The permittee must equip its HEPA afterfilter system as follows:
- a. The HEPA afterfilter must be configured to filter the entire exhaust flow of the baghouse;
 - b. The permittee must use HEPA filters that are rated to have a Minimum Efficiency Reporting Value of 17 (MERV 17) or higher based upon American National Standards Institute (ANSI) Standard 52.2;
 - c. The HEPA afterfilter must be equipped with a differential pressure monitoring device;
 - d. The permittee must prominently post the differential pressure design specification of the HEPA afterfilter immediately next to the afterfilter's differential pressure monitoring device.

- 3.4. Baghouse & HEPA Afterfilter Emission Action Level** The permittee must comply with the following baghouse/afterfilter operation and maintenance requirements:
- a. The permittee must operate/maintain the pressure drops across the baghouse and HEPA afterfilter within the associated manufacturer's design specifications and operational ranges;
 - b. The permittee must investigate and commence corrective action measures within 24 hours of documenting a system operation outside of the intended differential pressure range;
 - c. An operating pressure outside the differential pressure emission action level is not a violation of this permit condition; however, it is a violation of this permit condition if the permittee fails to investigate and act to correct the deviation within 24 hours of learning of the event.

4.0 PLANT SITE EMISSION LIMITS

- 4.1. Plant Site Emission Limits (PSEL)** Plant Site Emission Limits are not included in this permit because all air contaminants emitted by the permittee are emitted at rates below the de minimis levels defined in Oregon Administrative Rule 340-200-0020(39).

5.0 MONITORING/RECORDKEEPING REQUIREMENTS

- 5.1. Baghouse Design Specification Records** The permittee must keep readily accessible records documenting the engineering design specifications for its baghouse control device(s). These records must be kept for the life of each control device.
- 5.2. Baghouse Filter Bag Replacement Records** The permittee must keep readily accessible records documenting the manufacturer's design/performance specifications for all bag filters used as replacement components in its baghouse control device(s).
- 5.3. HEPA Afterfilter Specification Records** The permittee must keep readily accessible records documenting the engineering design specifications for its HEPA afterfilter(s). These records must be kept for the life of each control device.
- 5.4. HEPA Afterfilter Replacement Records** The permittee must keep readily accessible records documenting the manufacturer's design/performance specifications for all HEPA afterfilters used as replacement components in its HEPA afterfilter control device(s).
- 5.5. Monitoring & Recordkeeping** The permittee must monitor and maintain the following records related to the operation and maintenance of the plant and associated air contaminant control devices:

Monitored Parameter	Frequency
a. Maintain production records documenting the amount of each Glassmaking HAP used as a raw material.	Monthly
b. The quantity of glass produced using raw materials that contain one or more Glassmaking HAPs.	Monthly
c. Demonstrate compliance with Condition 2.1.c.ii by performing a calculation of the quantity of glass produced using raw materials that contain one or more Glassmaking HAPs for the previous 12 consecutive month period.	Monthly
d. Observe and record the exhaust gas temperature at the inlet of the baghouse. Record the date, time and results of each observation.	Weekly
e. Observe and record the differential pressure measured across the baghouse filter system. Record the date, time and results of each observation.	Weekly

f.	Observe and record the differential pressure measured across the HEPA afterfilter system. Record the date, time and results of each observation.	Weekly
g.	Log and identify the corrective action performed, the date it was initiated and the date it was completed, for any instance when a monitoring event required in Conditions 5.5.d, e, and f documents a device operating parameter outside of the intended operational design range (refer to Condition 3.4).	Each Occurrence
h.	Inspect the exhaust gas ductwork and emission control device housing for leakage. Record the date, time and results of the inspection.	Annually
i.	Inspect the interior of the baghouse for structural integrity and condition of the fabric filters. Record the date, time and results of the inspection.	Annually
j.	Maintain records of maintenance actions performed on the air contaminant control system.	Each Occurrence

5.6. Excess Emissions

The permittee must maintain records of excess emissions as defined in OAR 340-214-0300 through 340-214-0340 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must cease operation of the equipment or facility no later than 48 hours after the beginning of the excess emissions, unless continued operation is approved by DEQ in accordance with OAR 340-214-0330(4).

5.7. Complaint Log

The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee’s actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

5.8. Retention of Records

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application and make them available to DEQ upon request. The permittee must maintain the two (2) most recent years of records onsite.

6.0 REPORTING REQUIREMENTS

- 6.1. Excess Emissions** The permittee must notify DEQ of excess emissions events if the excess emission is of a nature that could endanger public health.
- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 9.3 by e-mail, telephone, facsimile, or in person.
 - b. If an excess emission event occurs during non-business hours, the permittee must notify DEQ by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
 - c. The permittee must also submit follow-up reports when required by DEQ.
- 6.2. Annual Report** For each year this permit is in effect, the permittee must submit to DEQ by **February 15**, two (2) copies of the following information for the previous calendar year:
- a. A statement of the facility's compliance status with the conditions of this permit for the calendar year. Any violations or exceedances must be explained in detail including corrective actions taken.
 - b. Quantity (tons) of glass produced using raw materials that contain one or more Glassmaking HAPs.
 - c. Records of all planned and unplanned excess emissions events.
 - d. Summary of complaints relating to air quality received by permittee during the year.
 - e. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
 - f. List of major maintenance performed on pollution control equipment.
- 6.3. Notice of Change of Ownership or Company Name** The permittee must notify DEQ in writing using a Departmental "Transfer Application Form" within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
 - b. Sale or exchange of the activity or facility.

- 6.4. Construction or Modification Notices** The permittee must notify DEQ in writing using a Departmental “Notice of Intent to Construct Form,” or other permit application form and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:
- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
 - b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
 - c. Constructing or modifying any air pollution control equipment.

7.0 ADMINISTRATIVE REQUIREMENTS

- 7.1. Permit Renewal Application** The permittee must submit a completed application package for the renewal of this permit **120 days prior to this permit’s expiration date**. Two (2) copies of the application must be submitted to the DEQ Permit Coordinator listed in Condition 9.2.
- 7.2. Permit Modifications** The permittee must submit an application for a modification of this permit not less than **60** days prior to the source modification. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the Business Office of DEQ.

8.0 FEES

- 8.1. Annual Compliance Fee** The permittee must pay the Annual Fee specified in OAR 340-216-8020, Table 2, Part 2 for a Simple ACDP by **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by DEQ regulations, will be mailed prior to the above date. **Late fees in accordance with Part 4 of the table will be assessed as appropriate.**
- 8.2. Change of Ownership or Company Name Fee** The permittee must pay the non-technical permit modification fee specified in OAR 340-216-8020, Table 2, Part 3(a) with an application for changing the ownership or the name of the company.
- 8.3. Special Activity Fees** The permittee must pay the special activity fees specified in OAR 340-216-8020, Table 2, Part 3 (b through k) with an application to modify the permit.

9.0 DEQ CONTACTS/ADDRESSES

- 9.1. Business Office** The permittee must submit payments for invoices, applications to modify the permit, and any other payments to DEQ's Business Office:
- Department of Environmental Quality
Accounting / Revenue
700 NE Multnomah St, Suite 600
Portland, Oregon 97232
- 9.2. Permit Coordinator** All notices and applications (not requiring associated fees) should be sent to the attention of the Permit Coordinator of DEQ's Northwest Regional Office:
- Department of Environmental Quality
Northwest Region
Attn: AQ Permit Coordinator
700 NE Multnomah St., Suite #600
Portland, OR 97232-4100
Telephone: (503) 229-5582
- 9.3. DEQ Contacts - General** All general inquiries associated with this permit should be directed to DEQ's Northwest Regional Office:
- Department of Environmental Quality
Northwest Region - AQ Section
700 NE Multnomah St., Suite #600
Portland, OR 97232-4100
Telephone: 503-229-5554
- 9.4. Report Submittals** Unless otherwise notified, the permittee must submit all reports (annual reports, source test plans and reports, etc.) to DEQ's Northwest Region identified in Condition 9.3 above. If you know the name of the Air Quality staff member responsible for your permit, please include it.
- 9.5. DEQ Contacts - Internet** Information about air quality permits and DEQ's regulations may be obtained from the DEQ web page at www.deq.state.or.us.
- 9.6. EPA Administrator** US Environmental Protection Agency
Director, Air and Waste Management Division
1200 Sixth Avenue
Seattle, WA 98101

10.0 GENERAL CONDITIONS AND DISCLAIMERS

- 10.1. Permitted Activities** This permit allows the permittee to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, or is revoked.
- 10.2. Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by DEQ.
- 10.3. Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 10.4. Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.
- 10.5. DEQ Access** The permittee must allow DEQ's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.
- 10.6. Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 10.7. Open Burning** The permittee may not conduct any open burning except as allowed by OAR 340, division 264.
- 10.8. Asbestos** The permittee must comply with the asbestos abatement requirements in OAR 340, Division 248 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.
- 10.9. Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

**10.10. Permit
Expiration**

- a. A source may not be operated after the expiration date of the permit, unless any of the following occur prior to the expiration date of the permit:
 - i. A timely and complete application for renewal or for an Oregon Title V Operating Permit has been submitted, or
 - ii. Another type of permit (ACDP or Oregon Title V Operating Permit) has been issued authorizing operation of the source.
- b. For a source operating under an ACDP or Oregon Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially.

**10.11. Permit
Termination,
Revocation,
or
Modification**

DEQ may modify or revoke this permit pursuant to OAR 340-216-0082 and 340-216-0084.

11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NSR	New Source Review
ASTM	American Society for Testing and Materials	O ₂	oxygen
AQMA	Air Quality Maintenance Area	OAR	Oregon Administrative Rules
calendar year	The 12-month period beginning January 1st and ending December 31 st	ORS	Oregon Revised Statutes
CFR	Code of Federal Regulations	O&M	operation and maintenance
CO	carbon monoxide	Pb	lead
CO _{2e}	carbon dioxide equivalent	PCD	pollution control device
DEQ	Oregon Department of Environmental Quality	PM	particulate matter
dscf	dry standard cubic foot	PM ₁₀	particulate matter less than 10 microns in size
EPA	US Environmental Protection Agency	PM _{2.5}	particulate matter less than 2.5 microns in size
FCAA	Federal Clean Air Act	ppm	part per million
Gal	gallon(s)	PSD	Prevention of Significant Deterioration
GHG	greenhouse gas	PSEL	Plant Site Emission Limit
gr/dscf	grains per dry standard cubic foot	PTE	Potential to Emit
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	RACT	Reasonably Available Control Technology
I&M	inspection and maintenance	scf	standard cubic foot
lb	pound(s)	SER	Significant Emission Rate
MMBtu	million British thermal units	SIC	Standard Industrial Code
NA	not applicable	SIP	State Implementation Plan
NESHAP	National Emissions Standards for Hazardous Air Pollutants	SO ₂	sulfur dioxide
NO _x	nitrogen oxides	Special Control Area	as defined in OAR 340-204-0070
NSPS	New Source Performance Standard	VE	visible emissions
		VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months



State of Oregon
Department of
Environmental
Quality

Simple AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

Department of Environmental Quality
Northwest Region
Trautman Art Glass, Inc.

Source Information:

SIC	3229
NAICS	327212

Source Categories (Table 1 Part, code)	B, 84.
Public Notice Category	II

Compliance and Emissions Monitoring Requirements:

FCE	
Compliance schedule	
Unassigned emissions	
Emission credits	
Special Conditions	

Source test [date(s)]	
COMS	
CEMS	
PEMS	
Ambient monitoring	

Reporting Requirements

Annual report (due date)	Feb 15
Quarterly report (due dates)	

Monthly report (due dates)	
Excess emissions report	
Other (specify)	

Air Programs

Synthetic Minor (SM)	
SM -80	
NSPS (list subparts)	
NESHAP (list subparts)	
Part 68 Risk Management	
CFC	

NSR	
PSD	
RACT	
TACT	
Other (specify)	CAGM Rule

TABLE OF CONTENTS

PERMITTING3
SOURCE DESCRIPTION3
COMPLIANCE.....5
EMISSIONS5
TITLE V MAJOR SOURCE APPLICABILITY6
ADDITIONAL REQUIREMENTS.....7
SOURCE TESTING7
PUBLIC NOTICE.....8

PERMITTING

PERMITTEE IDENTIFICATION

1. Trautman Art Glass, Inc.
2000 SE 4th Ave.
Canby, OR 97013-4371

PERMITTING ACTION

2. The proposed permit is a new permit for an existing source.

OTHER PERMITS

3. No other permits have been issued or are required by the DEQ for this source.

AREA ATTAINMENT STATUS

4. The source is located in a maintenance area for carbon monoxide (CO) and ozone [oxides of nitrogen (NO_x) and volatile organic compounds (VOC) are precursors of ozone]. The area is in attainment for all other criteria pollutants. The facility has de minimis emissions of all criteria pollutants [particulate matter (PM/PM₁₀/PM_{2.5}), CO, NO_x, VOC and sulfur dioxide (SO₂)].

Note:

- “Nonattainment Area” means any geographic area that exceeds any state or federal primary or secondary ambient air quality standard as designated by the Environmental Quality Commission (EQC) or the U.S. Environmental Protection Agency (EPA).
- “Maintenance Area” means any area that was formerly a nonattainment area, achieved attainment status and was re-designated as an attainment area by EPA, and re-designated a maintenance area by the EQC in Oregon Administrative Rule Chapter 340 division 204.

SOURCE DESCRIPTION

OVERVIEW

5. The permittee operates a Tier 1 borosilicate colored art glass manufacturing facility located at 2000 SE 4th Avenue in Canby. In 2016, DEQ determined that uncontrolled furnaces used in colored art glass manufacturing may emit potentially unsafe levels of certain air toxics, including arsenic, cadmium, chromium, lead, manganese, nickel or selenium (the “Glassmaking HAPs”). On October 3, 2016, DEQ adopted the Colored Art Glass Manufacturing rule (OAR 340-244- 9000 through 9090) to regulate large colored art glass manufacturers (Tier 2 CAGMs) as well as smaller colored art glass manufacturers (Tier 1 CAGMs).

PROCESS AND CONTROL DEVICES

6. The permittee's art glass manufacturing process typically includes crushing clear glass into cullet. Cullet gets combined or "batched" with raw materials to correspond to a specific glass product recipe or formula. Each such glass formula yields a uniquely colored glass product. Glass batches typically range in size from 30 to 60 pounds. Raw materials may contain compounds of the Glassmaking HAPs noted above. Once batching is complete the resulting mixture is charged into small electric furnaces for melting. Upon completion of the melt process the molten glass is drawn into rods or tubes. Finished glass rods may be sold or may be crushed into granules referred to as frit. Frit may be sold as a product or used as a component of other glass batches.

Particulate matter emissions are created by the permittee's crushing operation, batching operation and melt process. Emissions from batching and the melt process may include one or more of the Glassmaking HAPs. To comply with DEQ's Colored Art Glass Manufacturing rule the permittee chose to install a pollution control system that includes a fabric filter baghouse equipped with a HEPA afterfilter. The crushing and batching operations are performed inside a hood equipped with HEPA filtration and vents to room air. During the melt process the permittee's electric furnaces are placed within hoods where exhaust gases from the melt process are captured with point-of-use fume capture devices and ducted to the baghouse pollution control system for emission control.

7. Air contaminant sources at the facility will consist of the following:
 - a. One (1) – glass crushing operation. Operation is performed in a hood w/emissions controlled by a HEPA filter that vents to room air.
 - b. One (1) – raw material batching operation. Operation is performed in a hood w/emissions controlled by a HEPA filter that vents to room air.
 - c. 30 electric glass-making furnaces for the manufacture of glass products from raw materials that may contain one or more "Glassmaking HAPs." Emissions from these furnaces will be captured (using E-Z Arm fume capture devices in P1 – P10 [up to 3 kilns per hood]) and controlled by a high performance baghouse equipped with HEPA afterfilter.
 - d. 30 electric glass-making furnaces for the manufacture of non-HAP glass products. These furnaces will be exhausted to ambient air without control.
 - e. One (1) - dust control system to control particulate matter emissions from furnaces that manufacture HAP-containing glass:
 - i. The system includes one – 28,800 cfm baghouse manufactured by Filter-1 (model - Pulsatron PFV-32-75).
 - ii. Baghouse fabric (cartridge) filters are made of ultra-life nano fiber flame retardant media and are rated to remove greater than 99.9% of particles 0.5 micron in size.
 - iii. The baghouse is equipped with a HEPA afterfilter. HEPA filters are rated to remove greater 99.97% of particles that have a size of 0.3 μm .

COMPLIANCE

8. The facility will be inspected by DEQ personnel to ensure compliance with the permit conditions.
9. There have been no complaints recorded for this facility.
10. At the time of this permit action DEQ had taken no enforcement actions against this source.

EMISSIONS

11. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
PM/PM ₁₀ /PM _{2.5}	0	0	0	NA	NA	NA
SO ₂	0	0	0	NA	NA	NA
CO	0	0	0	NA	NA	NA
NO _x	0	0	0	NA	NA	NA
VOC	0	0	0	NA	NA	NA

- a. The netting basis is zero for Simple ACDPs in accordance with OAR 340-222-0040(3).
- b. In the table above, "Previous PSEL" refers to the PSEL from the last permit. This is the first permit issued to the permittee, so a PSEL had not previously been established.
- c. DEQ establishes PSELs in permits in accordance with OAR 340-222-0020(3)(a). Correspondingly, PSELs are not established in permits for pollutants that will be emitted at rates below their respective de minimis level [defined in OAR 340-200-0020(39)]. **Plant Site Emission Limits will not be included in this permit because all air contaminants emitted by the permittee are emitted at rates below the de minimis levels for the respective pollutants:**

As a Tier 1 CAGM, the permittee may not manufacture 100 or more tons per year of glass using raw materials that contain the glassmaking HAPs. Emissions (particulate matter) at the permittee's facility are controlled by a baghouse equipped with a HEPA afterfilter. The HEPA afterfilter provides the system with a final control efficiency of at least 99.97% for particles ≥ 0.3 microns in size. In an unfeasible operating scenario in which 100 tons of material with a uniform size distribution of 0.3 microns (the control efficiency basis of the permittee's HEPA afterfilter) were to be exhausted through the pollution control system, the resulting PM_{2.5} emission rate would not exceed 60 pounds.

- d. A PSEL is a federally enforceable limit on the potential to emit.

SIGNIFICANT EMISSION RATE ANALYSIS

12. The facility's potential emissions for each pollutant are less than the Netting Basis plus the significant emission rate; no further air quality analysis is required.

TITLE V MAJOR SOURCE APPLICABILITY

CRITERIA POLLUTANTS

13. A major source for Title V Permit applicability is a facility that has the potential to emit 100 or more tons per year of any criteria pollutant. This facility is not a major source of criteria pollutant emissions.

HAZARDOUS AIR POLLUTANTS

14. A major source for Title V Permit applicability is a facility that has the potential to emit 10 or more tons per year of any single hazardous air pollutant (HAP) or 25 or more tons per year of combined HAPs. All HAPs emitted by the permittee are emitted at levels that are less than the de minimis emissions rate (1 ton per year). This source is not a major source of hazardous air pollutants.

TOXIC USAGE

15. As previously stated, the permittee is a small colored art glass manufacturer recognized as a Tier 1 CAGM under DEQ's Colored Art Glass Manufacturing rule (OAR 340-244-9000 through 9090). The permittee uses raw materials that may contain one or more of the Glassmaking HAPs: arsenic, cadmium, chromium, lead, manganese, nickel or selenium. The permittee's combined emission rate for all of these compounds will be less than 1 pound per year.

ADDITIONAL REQUIREMENTS

NSPS APPLICABILITY

16. There are no sources at this facility for which NSPS standards have been promulgated.

NESHAPS/MACT APPLICABILITY

17. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated. NESHAP subpart 6S is not applicable to this facility because all of the furnaces are below the 50 ton/year threshold.

RACT APPLICABILITY

18. The facility is located in the Portland AQMA, but it is not one of the listed source categories in OAR 340-232-0010, thus the RACT rules do not apply.

TACT APPLICABILITY

19. DEQ's Colored Art Glass Manufacturing rule (OAR 340-244- 9000 through 9090) was specifically and categorically written to regulate large (Tier 2 CAGMs) and small (Tier 1 CAGMs) colored art glass manufacturers. The rule includes specific, stringent control requirements for all subject facilities. This source is meeting the control requirements of the CAGM rule and the State's TACT/Highest and Best Rules by capturing and ducting air contaminant emissions from the manufacturing process to a high performance baghouse equipped with a HEPA afterfilter. This control system technology is state-of-the-art and effectively removes particulate matter from the facility's exhaust gas; it equals or exceeds the level of control technology that would be determined in a separate TACT analysis. No further TACT analysis is necessary.

SOURCE TESTING

20. This permit does not include the requirement for performance of a source test; Tier 1 CAGMs are not required to perform source testing in DEQ's CAGM rule (OAR 340-244-9000 through 9090).

PUBLIC NOTICE

21. Pursuant to OAR 340-216-0064(3)(a), issuance of Simple Air Contaminant Discharge Permits require public notice in accordance with OAR 340-209-0030(3)(b), which requires DEQ to provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments. **The public notice was emailed/mailed on Friday Aug. 18, 2017 and the comment period will end on Friday Sept. 22, 2017 at 5:00 p.m.**

GGG:dpk