



**GLASS CO.**

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Portland OR  
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U S A

June 05, 2020

Oregon Department of Environmental Quality  
Northwest Region  
700 NE Multnomah St, Ste 600  
Portland, OR 97232

TELEPHONE  
503 232\*8887

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**Re: Bullseye Glass Company (Bullseye) Notification of Compliance with Emission Limits for Particulate Matter in 40 CFR 63.11451 and OAR 340-245-9070.**

Dear Mr. Kauth:

Pursuant to the Title V Air Quality Permit (Operating Permit No. 26-3135-TV-01) issued to Bullseye Glass Company (Bullseye) on April 14, 2020, Bullseye is providing notice of compliance with the particulate matter emission limits under 40 CFR 63 Subpart SSSSSS and OAR 340-245-9070(b)(A). This notification of compliance includes the information specified in 40 CFR §63.9(h)(2)(i)(A) through (G) as follows.

*(A) The methods that were used to determine compliance*

Bullseye determined compliance with the applicable particulate matter ("PM") emissions limits using the performance test methods and monitoring and recordkeeping procedures set forth in 40 CFR §63.11452(a)-(b) and OAR 340-245-9070(1)(b). 40 CFR §63.11452(b)(13) sets forth the required procedures that must be conducted to meet the applicable PM emission limit.

Compliance was demonstrated using the following procedures:

- The PM mass emission rate was measured at the outlet of the control device using ODEQ Method 5 (ODEQ Method 5 is equivalent to EPA Method 5 with the addition of determining the condensable fraction of PM).
- The exhaust stream PM mass emission rate was calculated for each of the three test runs.
- The glass production rate was determined for each test run.
- The production-based PM mass emission rate (lb./ton) was calculated for each test run and the average production-based PM mass emission rate was calculated to determine compliance with the emission limit established in Table 1 to Subpart SSSSSS of Part 63.

*(B) The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted*

The Performance Test Report and methods conducted are provided as Attachment 1. The Performance Test Report was originally submitted to DEQ on May 12, 2017 and a final report was submitted on July 21, 2017.

*(C) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods*

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Bullseye will implement the methods specified in 40 CFR §63.11455 and OAR 340-245-9080 for determining continuing compliance.

*(D) The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard*

See Attachment 1.

*(E) If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification)*

The relevant standard does not apply to both major and area sources (Subpart SSSSSS applies only to area sources).

*(F) A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method)*

The affected emission source has a PM emission control device (bag house equipped with a bag leak detection system.) Attachment 1 provides the PM control efficiency determined during the performance test.

*(G) A statement by the owner or operator of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements*

The performance test demonstrates compliance with the PM emission limits in 40 CFR 63.11451 and OAR 340-245-9070.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Bullseye submits this notification of compliance status without any admission that 40 CFR 63 Subpart SSSSSS applies to Bullseye. Bullseye reserves its right to object to the application of 40 CFR 63 Subpart SSSSSS to its facility.

If you have any questions, please give me a call at 503-232-8887 x103 or email me at [ericdurrin@bullseyeglass.com](mailto:ericdurrin@bullseyeglass.com).

Sincerely,



Eric E. Durrin  
Controller

Attachment 1 – Performance Test and Compliance Determination Calculations