

Jeffrey L. Hunter
JHunter@perkinscoie.com
D. +1.503.727.2265
F. +1.503.346.2265

May 2, 2016

VIA CERTIFIED MAIL AND ELECTRONIC MAIL

Gerald C. Ebersole
Department of Environmental Quality
Northwest Region
811 SW Sixth Avenue
Portland, OR 97204-1390

Re: Request for Information to Bullseye Glass Company

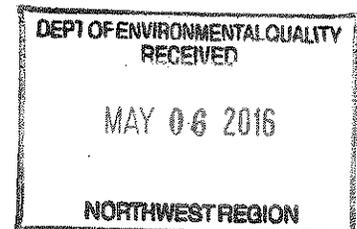
Dear Mr. Ebersole:

On behalf of Bullseye Glass Company (“Bullseye”), this letter and the accompanying information are sent in response to the Department of Environmental Quality’s (“DEQ”) April 13, 2016 letter requesting information regarding Bullseye’s furnaces (the “Information Request”).

As a preliminary matter, Bullseye disagrees with DEQ’s revised interpretation that Bullseye is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for Glass Manufacturing Area Sources, 40 CFR, Part 63 Subpart SSSSSS. Bullseye’s periodic and pot furnaces are not “continuous” furnaces as defined under 40 CFR § 63.11459 and therefore are not subject to the rule.

Bullseye requests that the information Bullseye is providing in response to DEQ’s request be treated as “trade secrets” and be exempt from disclosure to the public pursuant to ORS § 192.501 and OAR 340-214-0130. The documents include information (production capability and furnace configuration) that would be of value to Bullseye’s business competitors. To ensure the confidentiality of this information, Bullseye limits knowledge only to a select number of individuals who have a commercial need for the information. Bullseye also takes measures to protect this information from public disclosure, including requiring non-disclosure agreements from employees, contractors and vendors and making similar formal requests to other federal and state agencies. Bullseye greatly appreciates your cooperation with its request that the information contained here remains confidential.

In submitting this response, Bullseye is not consenting to DEQ’s authority to make the Information Request to Bullseye and reserves its right to object to DEQ’s assertion of such authority. In addition, Bullseye does not waive any right, privilege, or objection which Bullseye may have in any way related to the information provided in the response. Bullseye reserves the



G. Ebersole
May 2, 2016
Page 2

right to object to the use of any information provided in this response for any evidentiary purpose whatsoever.

Please call if you have any questions.

Sincerely,



Jeffrey L. Hunter
Counsel for Bullseye Glass Company

Enclosures

cc: Eric Durrin, Bullseye Glass Company

****Enclosure's not included
due to request for
confidentiality****



Oregon

Kate Brown, Governor

Department of Environmental Quality
Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5263
FAX (503) 229-6945
TTY 711

CERTIFIED MAIL NO.: 7011 0470 0002 9571 2107

May 4, 2016

Bullseye Glass Co.
Attn: Eric E. Durrin
3722 SE 21st Ave
Portland, OR 97202

RE: Warning Letter with Opportunity to Correct
Bullseye Glass Co.
WL 2016-WLOTC-1539
ACDP 26-3135-ST-01
Multnomah County

Dear Mr. Durrin:

On April 28 and 29, 2016 DEQ inspectors conducted visible emission observations of some Bullseye Glass Co. furnace exhaust stacks. Inspectors observed visible emissions in excess of the applicable limit of 20% (six minute average) from the exhaust stacks of furnaces 2 and 12. Other furnace exhaust stacks were observed to have visible emissions that may exceed the applicable limit but formal observations were not completed due to plume interference and stack angle from inspectors.

Based on the visible emission observations of your facility's furnace exhaust stacks, DEQ has concluded that Bullseye Glass Co. is responsible for the following violation of Oregon environmental law:

VIOLATION:

- (1) OAR 340-208-0110 states "For sources, other than wood-fired boilers, installed, constructed, or modified on or after June 1, 1970, no person may emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity"; Visible emissions using EPA method 9 were observed as 24% from furnace 2 and 28% from furnace 12 based on a 6 minute block average.

ears
Mail or
ial mail.
Certified
d to prov
e and att
postage
ceive a fe
rtified M
o the ad
he mailp
ase pres
n the C
e and ma
aking at

This is a Class II violation of Oregon regulations. On April 15, 2015 DEQ adopted a revised method for opacity observations, changing the evaluation time from 30 seconds aggregate in one hour to 6 minute block average. This change is not yet reflected in the existing Bullseye air quality permit, so the rule is being cited instead of the permit condition. Visible emission observations also exceed what is allowed by the Bullseye air quality permit condition 1.1.

Class I violations are the most serious violations; Class III violations are the least serious.

The Department is concerned that additional violations may have occurred or will occur, including visible emissions in excess of the applicable limit from other furnace exhaust stacks. To ensure you maintain compliance with air quality regulations, we recommend that you conduct formal visible emissions observations from all furnace exhaust stacks during periods of time when the highest opacity is expected.

Corrective Action(s) Requested

- 1) Develop a corrective action plan to limit visible emissions from all furnace exhaust stacks below the applicable limit in OAR 340-208-0110. The corrective action plan should include specific milestone dates to determine the extent of opacity issues and to implement corrective actions. Submit this corrective action plan to the Department for approval by June 5, 2016.

Should this violation remain uncorrected or should you repeat this violation, this matter may be referred to the Department's Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a Department order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this Warning Letter are in error, you may provide information to me at the office at the address shown at the top of this letter. The Department will consider new information you submit and take appropriate action.

The Department endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter, please feel free to contact me in writing or by phone at 503-229-5053.

Sincerely,



David Kauth, P.E.
Environmental Engineer

Cc: Office of Compliance and Enforcement, DEQ Headquarters



Oregon

Kate Brown, Governor

Department of Environmental Quality

Western Region Salem Office
4026 Fairview Industrial Dr SE
Salem, OR 97302
(503) 378-8240
FAX (503) 373-7944
TTY 711

April 26, 2016

Eric Durrin
Bullseye Glass Company
3722 SE 21st Ave
Portland, OR 97202

Thomas Rhodes
Horizon Engineering
13585 NE Whitaker Way
Portland, OR 97230

Re: Bullseye Glass Company
ACDP Permit 26-3135-ST-01
Source Test Plan Addendum

Eric Durrin and Thomas Rhodes:

On April 25, 2016 DEQ received a source test plan addendum from Horizon Engineering for testing at the Bullseye Glass facility in Portland. The addendum states testing for total and hexavalent chromium will now be tested at both the inlet to and the exhaust of the baghouse. DEQ understands that in addition to the testing already agreed to (particulate, total chromium and hexavalent testing at the inlet and particulate testing at the outlet of the baghouse) Bullseye Glass will also be testing for total chromium and hexavalent chromium at the outlet for two of the three test runs. Also due to concerns of inlet sample contamination during baghouse cleaning the inlet tests will be momentarily paused while the baghouse is cleaned. This source test plan addendum is approved with the following conditions:

1. Sampling at the outlet of the baghouse may not be paused while the baghouse is being cleaned.
2. Testing must meet the requirements of 40 CFR Part 63 Subpart SSSSSS.

Sincerely,

Mike Eisele, PE
AQ Source Test Coordinator
Western Region-Salem

cc: George Davis, DEQ: NWR-AQ File



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

April 25, 2016

Mr. Eric Durrin
Bullseye Glass Co.
3722 SE 21st Avenue
Portland, OR 97202

Re: Pre-Enforcement Notice
Bullseye Glass Co.
PEN-POR-AQ-2016-PEN-1526
File No. 26-3135
AQ-Multnomah Co.

Dear Mr. Durrin,

DEQ recently requested clarification and interpretation from EPA on the applicability of the National Emissions Standards of Hazardous Air Pollutants (NESHAP) for Glass Manufacturing Area Sources, 40 CFR, Part 63, Subpart SSSSSS (Subpart 6S) to facilities with equipment and operations comparable to those at Bullseye. Based on EPA's response, DEQ concluded that Bullseye is subject to Subpart 6S.

Subpart 6S has dual applicability criteria. The first set of applicability criteria in section 63.11448 of Subpart 6S are used to determine if a facility is subject to Subpart 6S. The second set of applicability criteria in section 63.11449 of Subpart 6S are used to determine which, if any, furnaces at a facility are subject to the requirements of Subpart 6S. It is possible to meet the first criteria and be subject to Subpart 6S, while some or all furnaces do not meet the second set of criteria and are therefore not required to meet any requirements. However, if a facility is subject to Subpart 6S, section 63.11449 requires that the facility obtain a Title V permit (referred to as a part 70 permit in Subpart 6S, section 63.11449(e)).

Because your facility is subject to Subpart 6S, your facility was required to apply for a Title V permit. The compliance date for your facility was December 28, 2009. Under Oregon Administrative Rule (OAR) 340-218-0040(1)(a)(A), you were required to apply for a Title V permit by December 28, 2010. Since you did not apply for a Title V permit, your facility is in violation of 40 CFR 63.11449(e) and OAR 340-218-0040(1)(a)(A).

By sending you this Pre-enforcement Notice, DEQ has initiated enforcement action for the violation described above. It is possible that your facility has furnaces that meet the applicability criteria in section 63.11449 of Subpart 6S. If that is the case, your facility is also in violation of the applicable sections of Subpart 6S. DEQ has requested information from you about the furnaces at your facility, and will use that information to determine if any furnaces meet the applicability criteria in section 63.11449 of Subpart 6S.

VIOLATION:

- (1) Failing to submit a timely application for an Oregon Title V Operating Permit as required by OAR 340-218-0040(1)(a)(A). (A Class II violation per OAR 340-012-0053(2)).

Class I violations are considered to be the most serious violations; Class III violations are the least serious.

The violation cited above is being referred to the Department's Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of civil penalties and/or a Department order. DEQ proposes to enter into a Mutual Agreement and Order (MAO) with you to address and resolve the existing violation and future potential violations. The MAO will include an agreed upon compliance schedule and operating conditions until a Title V permit is issued to Bullseye.

If you believe any of the facts in this Pre-Enforcement Notice are in error, you may provide written information to me at the address shown at the top of the letter. DEQ will consider new information you submit and take appropriate action.

DEQ endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter, please feel free to contact me in writing or by phone at 503-229-5053.

Sincerely,



David Kauth
DEQ/Northwest Region Office

cc: Leah Feldon, OCE, DEQ



BULLSEYE

GLASS CO.

April 19, 2016

3722 SE 21st
Portland OR
9 7 2 0 2
U S A

TELEPHONE
503 232*8887

FACSIMILE
503 238*9963

Mr. George Davis
Oregon Department of Environmental Quality
Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232

**Re: Bullseye Glass Company
NC Application Number 028560 Modification
ACDP No. 26-3135-ST-01**

*Amendment to
original NC filed
03/04/2016.
GGG*

Dear Mr. Davis:

Enclosed please find two copies of Bullseye Glass Company's amendment to its Type 1 Notice of Intent to Construct related to NC Application Number 028560. Based on observations during operation, we are modifying the information provided for section 10 of form AQ304. Included are the following materials:

- DEQ Form AQ104
- DEQ Form AQ304
- Attachments

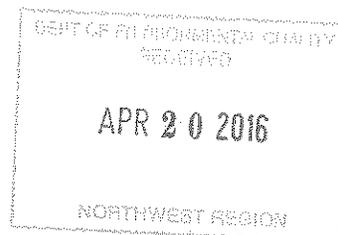
If you have any questions as you review these documents, please do not hesitate to contact me.

Sincerely,

Eric E. Durrin
Controller

Attachments

2 copies of Type 1 NOC application



NOTICE OF INTENT TO CONSTRUCT



FOR DEQ USE ONLY	
Permit Number: 26-3135-ST-01	Regional Office: POX
Application No: 028560	Date Received: 04/20/2016

1. Source Number: 26-3135	
2. Company Legal Name: Bullseye Glass Co., Inc Ownership type: Corporation	3. Facility Location Name: Bullseye Glass Company Plant start date: July 1974
Mailing Address: 3722 S.E. 21st Avenue	Street Address: 3722 S.E. 21st Avenue
City, State, Zip Code: Portland, OR 97202	City, County, Zip Code: Portland, OR 97202
4. Number of Employees (corporate): 140	Number of Employees (plant site): 120

5. Facility Contact Person Name: Eric Durrin Title: Controller Phone number: 503-232-8887 Fax number: 503-238-9963 e-mail address: EricDurrin@BullseyeGlass.com	6. Industrial Classification Code(s) SIC: 3211 NAICS: 327211
	7. Type of construction/change: (see instructions) Type 1

8. Signature

I certify that the information contained in this notice, including any schedules and exhibits attached to the notice, are true and correct to the best of my knowledge and belief.

Eric E. Durrin	Controller
_____ Name of official (Printed or Typed)	_____ Title of official and phone number
	4/19/2016
_____ Signature of official	_____ Date

DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
APR 20 2016



State of Oregon
Department of
Environmental
Quality

NOTICE OF INTENT TO CONSTRUCT

**FORM AQ104
ANSWER SHEET**

Construction Information

9. Description of proposed construction:

Installation of a baghouse on one existing batch glass melting furnace

- 10. Will the construction increase the capacity of the facility? If yes, how much?
- 11. Will the construction increase pollutant emissions? If yes, how much (see question 19) ?
- 12. Will the construction cause new pollutant emissions? If yes, which pollutants and how much?
- 13. Estimated timing of construction.
 - a. Commence date:
 - b. Begin date:
 - c. Completion date:
- 14. Will tax credits be requested once construction is completed?
- 15. Attach relevant forms from Form Series AQ200, Device/Process Forms.
- 16. Attach relevant forms from Form Series AQ300, Control Device Description Forms, if applicable.
- 17. Attach process flow diagram.
- 18. Attach a city map or drawing showing the facility location.
- 19. If applicable, attach a Land Use Compatibility Statement.



State of Oregon
Department of
Environmental
Quality

**BAGHOUSE
CONTROL DEVICE INFORMATION**

**FORM AQ304
INSTRUCTIONS**

1. Enter the control device identification label (e.g., Bunker Baghouse, #1 Baghouse, BH-1, etc.)
2. Enter the processes and/ or devices controlled by this unit. May use ID labels or descriptions.
3. Enter the year the control device was, or will be installed.
4. Enter the manufacturer and model number of the control device.
5. Enter the rated control efficiency, in percent, for the control device.
6. Describe the baghouse cleaning mechanism (e.g., shaker, pulse jet, reverse air, etc.). Specify the frequency with which cleaning is performed.
7. Enter the design inlet gas flow rate (actual cubic feet per minute).
8. Enter the number of bags that make up the baghouse.
9. Enter the design air to cloth ratio (square feet of total bag surface area divided by air flow).
10. Enter the design pressure drop across the baghouse (inches of water).
11. Describe/list any inlet gas pretreatment systems/devices. If the pretreatment systems are separate control devices, complete the appropriate control device description form for each device.



State of Oregon
Department of
Environmental
Quality

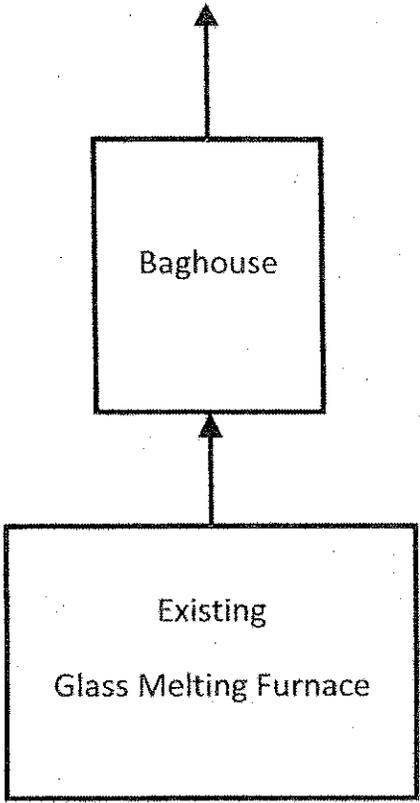
**BAGHOUSE
CONTROL DEVICE INFORMATION**

**FORM AQ304
ANSWER SHEET**

Facility Name: **Bullseye Glass Company, Inc**

Permit Number: **26-3135-ST-01**

1.	Control Device ID	BH-1		
2.	Process/Device(s) Controlled	Glass Furnace		
3.	Year installed	2016		
4.	Manufacturer/Model No.	Unknown		
5.	Control Efficiency (%)	Up to 99%		
6.	Type of cleaning mechanism and frequency	Pulse jet		
7.	Design inlet gas flow rate (acfm)	1000		
8.	Number of bags	14		
9.	Design air-to-cloth ratio	3.8		
10.	Design pressure drop (inches of water)	3-11		
11.	Inlet gas pretreatment? (yes/no) If yes, list control device ID and complete a separate control device form	No		



Process Flow Diagram
Type 1 NOC Application
Bullseye Glass Co.

Google Maps

3722 SE 21st Ave

Permit 26-3135





BULLSEYE

GLASS CO.

VIA CERTIFIED MAIL

Greg Grunow
Oregon Department of Environmental Quality
Northwest Region
700 NE Multnomah St., Suite 600
Portland, OR 97232

3722 SE 21st
Portland OR
9 7 2 0 2
U S A

TELEPHONE
503 232*8887

FACSIMILE
503 238*9963

Re: Request for Information to Bullseye Glass Company

Dear Mr. Grunow:

On behalf of Bullseye Glass Company ("Bullseye"), this letter and accompanying information and documents are sent in response to your April 12, 2016 information request (the "Information Request").

Pursuant to ORS § 192.501 and OAR 340-214-0130, Bullseye requests that Attachment 1 that Bullseye is providing in response to DEQ's Information Request be treated as "trade secrets" and be exempt from disclosure to the public. These documents disclose recipes and information that could be used to discern recipes. This information would be of value to Bullseye's business competitors. To ensure the confidentiality of this information, Bullseye limits knowledge only to a select number of individuals who have a commercial need for the information. Bullseye also takes measures to protect this information from public disclosure, including requiring non-disclosure agreements from employees, contractors and vendors and making similar formal requests to other federal and state agencies. Bullseye greatly appreciates your cooperation with its request that these records remain confidential.

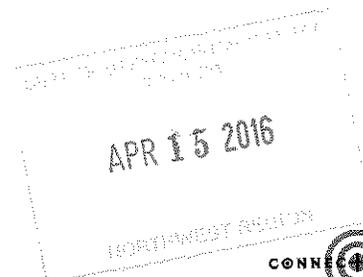
In submitting this response, Bullseye is not consenting to DEQ's authority to make the Information Request to Bullseye and reserves its right to object to DEQ's assertion of such authority. In addition, Bullseye does not waive any right, privilege, or objection which Bullseye may have in any subsequent proceeding related in any way to this response.

Bullseye reserves the right to object to the use of any information provided in this response for any evidentiary purpose whatsoever. By providing this response, Bullseye is not waiving any privilege which may be claimed as to this response, any documents provided herein or which may be provided in the future, or as to any discussions related to the issues outlined in this response. Bullseye reserves the right to supplement this response.

Please call if you have any questions.

Sincerely,
BULLSEYE GLASS COPMANY

Eric E. Durrin
Controller



A Glassworking
System

Bullseye Glass Company

Request for Information -- attachment 1



Oregon

Kate Brown, Governor

Department of Environmental Quality
Western Region Salem Office
4026 Fairview Industrial Dr SE
Salem, OR 97302
(503) 378-8240
FAX (503) 373-7944
TTY 711

April 14, 2016

Eric Durrin
Bullseye Glass Company
3722 SE 21st Ave
Portland, OR 97202

Thomas Rhodes
Horizon Engineering
13585 NE Whitaker Way
Portland, OR 97230

Re: Bullseye Glass Company
ACDP Permit 26-3135-ST-01
Alternative Sample Probe Liner

Eric Durrin and Thomas Rhodes:

On April 14, 2016 DEQ received an email from Horizon Engineering requesting approval to use a glass lined probe in lieu of the Teflon lined probe required in the test method and by condition 10 in the test plan approval letter. According to EPA, glass was not included as an approved liner material in Method 0061 due to suspected chromium VI contamination. Using a glass lined probe, based on the information from EPA, introduces the possibility of directionally biasing the final results higher than otherwise measured. This approach would result in a conservative estimation of emissions; the measured amount could be higher, but not lower than actual concentrations in the stack. DEQ is approving your request for this substitution, but will not approve any proposed corrections for contamination introduced by the use of glass liners.

Sincerely,

Mike Eisele, PE
AQ Source Test Coordinator
Western Region-Salem

cc: George Davis, DEQ: NWR-AQ File





Oregon

Kate Brown, Governor

Department of Environmental Quality

Agency Headquarters
811 SW Sixth Avenue
Portland, OR 97204-1390
(503) 229-5696
FAX (503) 229-6124
TTY 711

April 13, 2016

Eric Durrin, Vice President/Controller
Bullseye Glass Co.
3722 SE 21st Avenue
Portland, OR 97202

Re: Applicability of 40 CFR Part 63 Subpart SSSSSS

Eric,

DEQ recently requested clarification and interpretation from EPA on the applicability of the National Emissions Standards of Hazardous Air Pollutants (NESHAP) for Glass Manufacturing Area Sources, 40 CFR, Part 63, Subpart SSSSSS to facilities with equipment and operations comparable to those at Bullseye Glass.

DEQ requested this clarification as a result of recent investigations and new understanding and information about your operations. Subpart SSSSSS controls air emissions from glass manufacturing plants that are area sources that emit hazardous air pollutant metals (arsenic, cadmium, chromium, lead, manganese, and nickel) and which meet the relevant applicability criteria outlined in the rule. DEQ requested clarification from EPA to ensure that the appropriate regulations are being applied to your facility.

Is Bullseye subject?

The relevant applicability criteria in the rule state that a facility is subject to the subpart if they are an “*area source of hazardous air pollutant (HAP) emissions*” and meet the criteria detailed in 40 CFR §63.11448. There are three criteria in assessing applicability of the subpart, the two most relevant to Bullseye are:

1. §63.11448(a) *A glass manufacturing facility is a plant site that manufactures flat glass ... by melting a mixture of raw materials ... to produce molten glass and form the molten glass into sheets, containers, or other shapes.*
2. §63.11448(c) *[A] glass manufacturing facility [that] uses one or more continuous furnaces to produce glass that contains compounds of one or more glass manufacturing metal HAP ... as raw materials in a glass manufacturing batch formulation.*

Additionally, and of relevance to your facility and DEQ’s request for clarification, Subpart SSSSSS defines some of the critical terms used in determining applicability. Specifically, in §63.11459 the subpart defines that: “*continuous furnace means a glass manufacturing furnace*

that operates continuously except during periods of maintenance, malfunction, control device installation, reconstruction, or rebuilding”.

Under the definitions of the subpart Bullseye meets the applicability test under §63.11448(a). Bullseye manufactures flat glass by melting a mixture of raw materials (as defined in §63.11459) and forms the molten glass into sheets, containers, or other shapes. That Bullseye meets this definition is unambiguous.

In assessing the applicability based on §63.11448(c), DEQ had previously stated, in the Review Report for Bullseye’s current permit, that the subpart did not apply to Bullseye because “*the regulation applies only to continuous furnaces. Bullseye operates only periodic furnaces*”. EPA clarified, in part, that Bullseye operates “*refractory furnaces that melt glass in a batch process but are continuously operated*” (emphasis added) and that, though glass product is produced in batches, “*natural gas is fired and the furnace stays at a high temperature at all times, with only the exemptions outlined in the definition of ‘continuous furnace’ in Subpart SSSSSS*”.

Based on EPA’s clarification and other information about Bullseye’s operations, DEQ has revised its previous interpretation and has determined that Subpart SSSSSS applies to Bullseye.

Which furnaces are subject to requirements in Subpart SSSSSS?

As part of this letter DEQ is requesting information to identify which furnaces at Bullseye are subject to the provisions; that request is detailed in following sections. Based on the current information DEQ has regarding the operations at Bullseye, DEQ is asserting that some furnaces at Bullseye are subject to the provisions of the subpart. In 40 CFR §63.11449, the subpart is clear that “*existing or new affected*” furnaces located at a glass manufacturing facility are required to comply with the provisions of the subpart if they meet the criteria below:

1. §63.11449(a)(1) *The furnace is a continuous furnace, as defined in §63.11459.*
2. §63.11449(a)(2) *The furnace is charged with compounds of one or more glass manufacturing metal HAP as raw materials.*
3. §63.11449(a)(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).*

The primary production furnaces at Bullseye meet the definition of continuous furnace, as clarified by EPA and discussed in the previous section. In assessing (2) and (3) above, DEQ has confirmed through multiple inspections and a review of the records provided by Bullseye that many of the furnaces are “*charged with compounds of ... glass manufacturing HAP(s) as raw materials*”; and that production from one or more of those furnaces has met or exceeded a rate of at least 50 tons per year (tpy).

40 CFR §63.11449 goes on to describe which parts of the plant are covered by the subpart. DEQ has detailed those provisions and our responses below:

§63.11449 (b) A furnace that is a research and development process unit, as defined in §63.11459, is not an affected furnace under this subpart.

Research and development, as applied in subpart SSSSSS, means a “unit whose purpose is to conduct research and development for new processes and products and is not engaged in the manufacture of products for commercial sale, except in a de minimis manner”. The furnaces at Bullseye are engaged in production to create saleable products as evidenced by records, comments and published materials.

§63.11449 (c) An affected source is an existing source if you commenced construction or reconstruction of the affected source on or before September 20, 2007.

§63.11449 (d) An affected source is a new source if you commenced construction or reconstruction of the affected source after September 20, 2007.

DEQ does not have complete records detailing comprehensively which furnaces at Bullseye commenced construction or reconstruction on or before September 20, 2007; this information is needed to determine which of the provisions of Subpart SSSSSS individual furnaces are subject to. DEQ will be requesting additional information to confirm which furnaces this condition is applicable to.

§63.11449 (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.

This requirement of the subpart does not describe applicability criteria but instead outlines the obligations incumbent on an owner or operator of a subject source to obtain a Title V permit as required under either 40 CFR part 70 or 40 CFR part 71.

Based on the information DEQ has about your furnaces and operations, DEQ has concluded that you operate at least one furnace, and likely multiple furnaces, that meet the applicability criteria of the rule and so are subject to the requirements of the subpart.

Initial request for information

Under Oregon Administrative Rule (OAR) 340-214-0110, DEQ is authorized to reasonably require any and all information for the purpose of regulating stationary sources. In accordance with this authority DEQ is requesting the following information be provided in a reasonably timely manner but no later than 5 p.m. on April 18th, 2016:

A list of furnaces at Bullseye, with unique identifiers for each furnace which identifies:

1. Each furnace which is currently used in a manner that it is charged with compounds of one or more glass manufacturing metal HAP as raw materials.
2. Annual (12 month period) glass production capacity for each furnace.
3. Annual (12 month period) glass production capacity for each furnace that uses metal HAPs as a raw ingredient.
4. Each furnace which has, at any point since December 26, 2007, been used in a manner that it was charged with compounds of one or more glass manufacturing metal HAP as raw materials.
5. The current glass production levels, in tons per year (12 month period) of each furnace that produces glass containing metal HAPs.

6. The glass production levels, in tons per year (12 month period) of each furnace that produced glass containing metal HAPs since December 2007.
7. Each furnace that Bullseye asserts meets the definition of research and development process unit, as defined in §63.11459.
8. The date of construction for each of the currently existing furnaces.
9. The date of reconstruction, if applicable, for each of the currently existing furnaces.

Reconstruction as defined in 40 CFR 63.2:

Reconstruction [...] means the replacement of components of an affected or a previously nonaffected source to such an extent that:

- (1) The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source; and*
- (2) It is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by the Administrator (or a State) pursuant to section 112 of the Act. Upon reconstruction, an affected source, or a stationary source that becomes an affected source, is subject to relevant standards for new sources, including compliance dates, irrespective of any change in emissions of hazardous air pollutants from that source.*

The above information will provide DEQ the information we need to specify what requirements apply to which furnaces and what Bullseye must do to be in full compliance.

As stated above, DEQ has revised our determination about the applicability of 40 CFR, Part 63, Subpart SSSSSS, in light of EPA's clarification, and has concluded that Bullseye is subject to the rule. We look forward to receiving the information requested above to determine which furnaces are subject to which requirements of the subpart; and to support actions moving forward which will ensure that Bullseye is in full compliance with all applicable regulations.

If you have any questions please contact me at 503-229-5160 or ebersole.gerald@deq.state.or.us.

Sincerely,



Gerald C Ebersole

Interim Air Quality Manager
Northwest Region

cc: Leah Feldon, Oregon DEQ (via email)
Jaclyn Palermo, Oregon DEQ (via email)
Nina DeConcini, Oregon DEQ (via email)
Joni Hammond, Oregon DEQ (via email)
Katie McClintock, US EPA (via email)
Paul Koprowski, US EPA (via email)

Enclosures: DEQ clarification request to EPA
EPA response to DEQ



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 12 2016

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Ms. Joni Hammond, Deputy Director
Oregon Department of Environmental Quality
811 SW Sixth Avenue
Portland, OR 97204

Dear Ms. Hammond:

On March 9, 2016, you requested that the Environmental Protection Agency (EPA) provide a regulatory interpretation regarding the applicability of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Glass Manufacturing Area Sources, 40 CFR, Part 63, Subpart SSSSSS (Subpart SSSSSS) to tank furnaces at art glass manufacturers in Portland, Oregon. Based on your description of the operation of these tank furnaces, and information gathered by EPA, we believe that these furnaces would be subject to Subpart SSSSSS, absent any relevant considerations not mentioned in your letter. Our understanding of the facts and our reasoning are set out below.

As you described in your letter, although there are three criteria for whether a furnace is an affected facility, you are only seeking guidance on the criteria that the furnace is a "continuous furnace." Our definition of "continuous furnace" is "a glass manufacturing furnace that operates continuously except during periods of maintenance, malfunction, control device installation, reconstruction, or rebuilding." (40 CFR, §63.11459)

The day tanks you described at Uroboros and Bullseye are similar to those used at other facilities in the colored glass industry. They are refractory furnaces that melt glass in a batch process but are continuously operated. Once a furnace is built and brought up to temperature, it is continuously operated at around 2000° F or higher until the end of the furnace's refractory life when it is cooled to ambient temperatures and rebricked prior to the start of a new campaign. During the life of the furnace, glass is produced in 24 hour melt cycles and generally on a production schedule (either part time or full time). During glass production, the furnaces operate generally around 2500° F. Depending on the facility, the furnaces may not hold or melt glass for a day or two on the weekend or intermittently based on demand. They also may idle to closer to 2000° F during holidays or production breaks. However, natural gas is fired and the furnace stays at a high temperature at all times, with only the exemptions outlined in the definition of "continuous furnace" in Subpart SSSSSS.

In response to stained glass company commenters on Subpart SSSSSS who indicated they operate "small periodic furnaces", the EPA stated:

Therefore, we have revised § 63.11448 to specify that periodic or pot furnaces are not subject to the final Glass Manufacturing Area Source NESHAP. We believe this revision will address most of the concerns of the stained glass manufacturing sector as well as other sectors and organizations, such as artisans, schools, studios, and other small facilities that produce glass using periodic furnaces. 72 FR 73186 (December 26, 2007)

In choosing to exempt non-continuous furnaces, the EPA focused on their operation being periodic. A furnace that shuts down seasonally or is only operated for portions of the year would not be considered a continuous furnace. This revision was meant to address the concerns of small operators or artisanal shops which may turn kilns/furnaces on and off regularly. The furnaces you describe are kept hot (operated) for a year or more between rebrickings and produce glass on a routine schedule.

Consequently, based on the information provided and our understanding of operations at the facilities in question, we believe that, consistent with the intent of the definitions in Subpart SSSSSS, the art glass tank furnaces in question are "continuous furnaces" and are therefore subject to Subpart SSSSSS.

We recognize that there may be some confusion within the art glass industry about this rule. As a result, we encourage you to work with affected companies to ensure that they take appropriate steps to comply with the rule following today's clarification.

Please note that this response is a non-binding regulatory interpretation based on the information provided by Oregon Department of Environmental Quality (Oregon DEQ) and information gathered by EPA. This response should not be considered an applicability determination, nor does it represent final Agency action, since it is not in response to a facility request. Oregon DEQ may, in its discretion, consider this interpretation and any other relevant information it has in determining the applicability of Subpart SSSSSS to any facilities in its state.

If you have further questions, please contact Patrick Yellin of my staff at (202) 564-2970, or yellin.patrick@epa.gov.

Sincerely,



Edward J. Messina, Director
Monitoring, Assistance, and Media Programs Division
Office of Compliance



Oregon

Kate Brown, Governor

Department of Environmental Quality

Agency Headquarters
811 SW Sixth Avenue
Portland, OR 97204-1390
(503) 229-5696
FAX (503) 229-6124
TTY 711

March 9, 2016

Edward J. Messina, Director
Monitoring, Assistance, and Media Programs Division, US EPA
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460

Re: Applicability Determination Request

Mr. Messina,

As a result of recent investigations and information, DEQ is reevaluating the applicability of 40 CFR Part 63 Subpart SSSSSS Area Source NESHAP (6S) to two specific facilities, the Uroboros and Bullseye glass manufacturing facilities, in Portland, Oregon. Subpart 6S controls air emissions from glass manufacturing plants that are area sources and which emit urban hazardous air pollutant metals (arsenic, cadmium, chromium, lead, manganese, and nickel) and which meet the relevant applicability criteria outlined in the rule.

The two relevant applicability criteria in the rule are:

1. §63.11448 (a) *A glass manufacturing facility is a plant site that manufactures flat glass ... by melting a mixture of raw materials ... to produce molten glass and form the molten glass into sheets, containers, or other shapes.*
2. §63.11448 (c) *[A] glass manufacturing facility [that] uses one or more continuous furnaces to produce glass that contains compounds of one or more glass manufacturing metal HAP ... as raw materials in a glass manufacturing batch formulation.*

Additionally, §63.11449 details that the subpart applies to existing or new furnaces (as elsewhere defined in the subpart):

That [are] 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).*

Under the definitions of the rule both Bullseye and Uroboros meet the applicability test under §63.11448 (a); and the furnace criteria of §63.11449 (2) and (3) are clear and unambiguous in their application to the respective facilities.

The essential question is the applicability of the subpart based on the definition of a “continuous furnace” which is defined, under §63.11459 as “*a glass manufacturing furnace that operates continuously except during periods of maintenance, malfunction, control device installation, reconstruction, or rebuilding*”.

Bullseye and Uroboros both primarily use a furnace type called a “day tank.” The day tanks resemble a smaller scale version of the larger production furnaces used in the container and float glass industries. They are built on-site and are composed of several different types of refractory (brick) material. The general design is a cube with a rounded (crown) top. It is filled, using various means, with raw materials and glass ingredients which rest at the bottom of the furnace; gas and air, or oxygen, are fired just above the maximum glass line. When the glass is finished melting, it is removed with a ladle. The furnace exhaust is then vented out of a flue. As part of normal operations, and influenced by product specification requirements, the facilities remove as much glass as possible before starting the next batch.

The day tanks at Bullseye are primarily fired using oxygen and natural gas. The day tanks at Uroboros use air and natural gas and some have a heat exchanger (recuperator) to pre-heat combustion air. The combustion happens above the raw materials/glass level and heat transfer happens through the surface of the glass, where there is also volatilization of raw materials. Off gassing from this volatilization and off gassing from chemical reactions within the glass are exhausted out the stack with the combustion gases.

Temperatures in the day tank are, broadly and generally, around 2,500°F during melting. The furnaces have the ability to be slightly lower in temperature while glass is ladled out; after being emptied, they are heated back up to the 2,500°F range before being charged with new raw materials. Both facilities melt on approximately a 24 hour schedule with, generally, 5-8 hours to add raw materials, 6-8 hours to cook, and 6-8 hours to ladle glass out of the day tank.

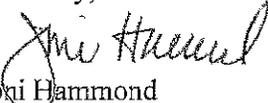
The furnaces are kept hot for 350 to 500 production days to be available for melting. After this rough timeframe the furnaces are cooled to ambient temperature, completely dismantled, and are re-bricked (all of the refractory brick is replaced) before it is reheated and put back in operation. Once the furnace begins operation after a re-bricking, the furnace is kept above 2,000°F by constantly firing the burners. These furnaces are only cooled to ambient temperatures when they are re-bricked. The day tanks primarily melt batches of glass sequentially, with, potentially, a brief reheat period from the lower temperatures at the end of a batch (approximately 2,200°F). The day tanks can be idled down to 2,000°F if they are not needed to melt glass.

Overall, Bullseye melts glass from Sunday mid-day to Friday evening; Uroboros generally operates about 4 consecutive days per week (M-Th or T-F). Furnaces can also be idled when not in use and at other times for various reasons (e.g. holidays or customer product demands, among others).

Based on the nature of the furnace operations DEQ is requesting clarification on the interpretation of Subpart SSSSSS as it applies to the processes at the facilities, and as described above.

DEQ also wants to ensure that the glass manufacturing facilities with similar processes as Bullseye and Uroboros are regulated in a fair and consistent manner throughout the EPA regions. DEQ therefore requests that EPA evaluate glass manufacturing facilities with similar processes as Bullseye and Uroboros in light of EPA's response to this request; and that EPA shares its intention and plan to do so.

Sincerely,


Joni Hammond
Deputy Director

cc: Katie McClintock, US EPA (*via email*)
Paul Koprowski, US EPA (*via email*)
Leah Feldon, Oregon DEQ (*via email*)
Nina DeConcini, Oregon DEQ (*via email*)
David Monro, Oregon DEQ (*via email*)
Jaclyn Palermo, Oregon DEQ (*via email*)



Oregon

Kate Brown, Governor

Department of Environmental Quality
Western Region Salem Office
4026 Fairview Industrial Dr SE
Salem, OR 97302
(503) 378-8240
FAX (503) 373-7944
TTY 711

April 12, 2016

Eric Durrin
Bullseye Glass Company
3722 SE 21st Ave
Portland, OR 97202

Thomas Rhodes
Horizon Engineering
13585 NE Whitaker Way
Portland, OR 97230

Re: Bullseye Glass Company
ACDP Permit 26-3135-ST-01
Source Test Plan

Eric Durrin and Thomas Rhodes:

DEQ originally received the source test plan for testing the emissions from glass furnace T7 located at Bullseye Glass in Portland, OR on March 21, 2016. DEQ received the first revised plan on March 25, 2016, and final revised plan on April 8, 2016. The final plan details the methods and approach to determine the emission rate and removal efficiency of particulate matter (PM) from the baghouse inlet and exhaust, and the measurement of total chromium (Cr) and hexavalent chromium (Cr⁺⁶) at the baghouse inlet. DEQ has reviewed the source test plan and is approving it with the following conditions:

GENERAL PROCESS CONDITIONS

- 1.) Only regular operating staff may adjust the production process and emission control parameters during the source performance tests and within two (2) hours prior to the tests. Any operating adjustments made during the source performance tests, which are a result of consultation during the tests with source testing personnel, equipment vendors or consultants, may render the source performance test invalid. Any adjustments made during the test must be recorded and included in the test report.
- 2.) Testing shall be performed while the furnace is making glass with the highest percentage of chromium normally used. The furnace must also be fired in the most oxidizing condition under which chromium containing glass is normally made. The ingredients in the batch must be the most oxidizing ingredients normally used to make chromium containing glass. Documentation stating and explaining this must be provided in the test report.

- 3.) During source testing the following process parameters must be monitored, recorded, and documented in the source test report. The process parameters below are to be reported for each individual test run and averaged for all test runs, if appropriate.
- Amount of total chromium in the batch (lbs)
 - Type and quantity of material being processed
 - Oxygen usage (quantity used, hourly minimum)
 - Natural gas usage (quantity used, hourly minimum)
 - Furnace temperature (°F, hourly minimum)
 - Baghouse pressure drop (inches of water column, twice per test run)
 - Weight of charges during each batch (lbs)
 - Time of charges
 - Weight of finished product (lbs)
 - Duration of the charging period (hrs)
 - Duration of refining period (hrs)
 - All other normally recorded information

**TOTAL CHROMIUM & HEXAVALENT CHROMIUM (EPA SW-846 METHOD 0061)
CONDITIONS**

- 4.) During sampling, make sure other sampling equipment is not interfering with isokinetic sampling.
- 5.) Take steps to minimize the blockage effects of the sampling probe in the test duct/stack.
- 6.) Testing must be performed using two ports located 90 degrees from each other.
- 7.) The sample shall be collected in a different plane (i.e., different set of ports and a port at a different angle) than the inlet particulate sample.
- 8.) To ensure that representative chromium samples are collected during these extended test intervals (~16 hours), four sequential traverses should be performed on each of the two ports. For example, sampling points should be moved every ten minutes (120 minutes per traverse), rather than performing a single traverse (40 minutes per point). The test run only needs to include one port change.
- 9.) Ensure the recirculating KOH cannot be lost out the sampling nozzle.
- 10.) With the exception of the sampling nozzle (glass) and the silica gel impinger, all of the sampling train components (including connecting fittings) shall be Teflon.

- 11.) In Section 10, Horizon notes that the pH of the KOH sample solution will be measured after the completion of the testing, which is required by the method. Given the duration of the testing you may, to make sure the pH of the absorbing solution remains above 8.5, momentarily pause the test to check the pH periodically throughout the run (e.g., every few hours). Any pH data collected shall be documented on the field data sheet. Leak checks must be completed any time the sampling system is opened. Leak checks of the equipment and any gain in volume by the dry gas meter due to the leak checks must also be documented on the field data sheets. Correct the final sample volume by the amount collected during the leak checks and use the corrected sample volume amount for emissions calculations.
- 12.) Equation 7.6.4 of the method has an error. If Horizon opts to perform a blank correction, please use the following equation:
$$m = [(S, \text{ug/ml} * V_{ls}, \text{ml}) - (B, \text{ug/ml} * 300 \text{ ml})] \times d$$
(Note: The above equation assumes that the impingers are initially charged with 300 mls of the KOH reagent)
- 13.) Verify the KOH recirculation rate is at least 50 ml/min.
- 14.) Record the nitrogen purge rate and duration.
- 15.) Following purging and filtration, the sample solution is to be transferred to polyethylene sample bottles.
- 16.) Following the test, the impinger solution shall be purged with nitrogen and filtered through an acetate membrane filter (0.45 um pore size); refer to Section 5.4.3 of the method.
- 17.) The volume of DI water used to rinse the sampling train directly affects the detection limit. The volume should be sufficient to quantitatively rinse the train; it should not be excessive. We recommend that a pre-measured volume of rinse water (e.g., 100 mls) be provided to the sample recovery person so that the same amount of rinse is used for each test.
- 18.) Take steps to make sure the level of hexavalent chromium in the KOH reagent is as low as possible before testing begins.
- 19.) Meticulously follow the procedures in section 7.1.2 to make sure the sampling trains are free of contaminants.
- 20.) The hexavalent chromium analyses are to be completed within 14 days of sample collection (Section 6.3 of the method).
- 21.) Hexavalent and total chromium test results must be reported as indicated below for each individual test run and averaged for all three test runs. Hand calculations must be provided for at least one test run.
 - ng/dscm
 - lbs/hr
 - lbs/ton of chromium processed
 - lbs/ton of glass produced

- 22.) Use the particulate removal efficiency to calculate the emission rate of hexavalent and total chromium emissions. Report results as indicated below for each individual test run and averaged for all three test runs. Hand calculations must be provided for at least one test run.

- ng/dscm
- lbs/hr
- lbs/ton of chromium processed
- lbs/ton of glass produced

Note that Item 22 data (baghouse *exhaust* chromium emissions) shall be clearly denoted in the report's summary table(s) as 'calculated (vs. measured) values'.

FLOW RATE AND MOISTURE (EPA METHODS 1, 2, & 4) CONDITIONS

- 23.) The exhaust duct configurations and flow measurements must meet the EPA Methods 1/1A & 2 criteria. Documentation including clear diagrams must be provided in the source test report.
- 24.) The sample locations must be checked for cyclonic flow. Documentation of this must be provided in the test report.
- 25.) Ensure that the manometer used to record pressure readings meets the criteria of Method 2 Section 6.2.
- 26.) Moisture content of the exhaust stack gas must be determined by EPA Method 4 for each test run. In addition, Section 12.1.7 of EPA Method 4 states "In saturated or moisture droplet-laden gas streams, two calculations of the moisture content of the stack gas shall be made, one using a value based upon the saturated conditions (alternate method) and one based upon the results of the impinger analysis (EPA Method 4). If this is the case, then ODEQ Method 4 (wet bulb/dry bulb) shall be used as the alternative method. At a minimum, two measurements of moisture content using ODEQ Method 4 shall be made for each run and averaged for the run. The lower of the two values as determined by EPA Method 4 and ODEQ Method 4 shall be considered correct for each run.

EXHAUST GAS COMPOSITION (EPA METHOD 3C/ASTM METHODS 1946) CONDITIONS

- 27.) N_2 , O_2 , CO_2 , CO , CH_4 , C_2H_6 , and C_3H_8 concentrations must be determined to calculate the molecular weight of the exhaust. Collect sample at a constant rate over the duration of the test run. Record the sampling rate on the field data sheet.
- 28.) Immediately after the completion of the test run, close the bag valve and keep the bag under positive pressure until the sample is analyzed to ensure any leakage of the bag will not dilute the sample. A band around the bag should be sufficient to accomplish this although other measures may be taken that accomplish the same result. In the event that multiple bags are collected, record the start and end times of the collection periods.
- 29.) Analyze each bag separately and time weight the concentrations to get an average molecular weight over the duration of each test run.

- 30.) EPA Method 3A is cited in the test plan, DEQ understands that this is an inaccuracy and that Method 3A will not be used during this testing program. The methods referenced in this section will be used to determine the molecular weight in place of Method 3A.

PARTICULATE MATTER (EPA/ ODEQ METHOD 5) CONDITIONS

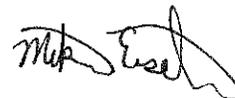
- 31.) During sampling, make sure other equipment is not interfering with isokinetic sampling.
- 32.) Additional (i.e., empty) impingers may be added between the second and fourth impinger to collect condensate from the flue gas.
- 33.) At the inlet sampling location, the particulate sample shall be collected in a different plane (i.e., different set of ports and a port at a different angle) than the chromium sample is being collected.
- 34.) Take steps to minimize the blockage of the sampling location with sampling equipment.
- 35.) To ensure that representative particulate samples are collected during these extended test intervals (~16 hours), four sequential traverses should be performed on each of the two ports. For example, sampling points should be moved every ten minutes (120 minutes per traverse), rather than performing a single traverse (40 minutes per point). The test run only needs to include one port change.
- 36.) If the filter becomes plugged to the point in which isokinetics can no longer be maintained pause the inlet and outlet sampling. Leak check the sampling system with the clogged filter; replace the filter; repeat the check the sampling system; make note of the dry gas meter's volume displacement caused by the leak checks; and continue testing. Correct the final sample volume by the amount collected during the leak checks and use the corrected sample volume amount for emissions calculations.
- 37.) For ODEQ Method 5, the method quantifiable limit (MQL) is 7 mg of PM, which should be taken into consideration when targeting a minimum sample volume and when calculating results. If less than 7 mg is collected, calculations shall be based not on the actual mass of PM collected but on the MQL of 7 mg as a "less than quantifiable limit" value.
- 38.) For both the inlet and outlet of the baghouse provide filterable, condensable and total PM test results. The results must be reported as follows for each test run and averaged for all three test runs. Complete hand calculations must be provided for at least one test run.
- gr/dscf
 - lb/hour
 - lb/ton of glass produced
 - % removal efficiency based on lb/hour of the inlet and outlet results

GENERAL TESTING CONDITIONS

- 39.) The ODEQ must be notified of any changes in the source test plan and/or the specified methods prior to testing. Significant changes not acknowledged by the DEQ could be basis for invalidating an entire test run and potentially the entire testing program. Documentation of any deviations must include an evaluation of the impact of the deviation on the test data. Deviations may result in rejection of the data, requiring a retest.
- 40.) Method-specific quality assurance/quality control (QA/QC) procedures must be performed to ensure that the data is valid. Documentation of the procedures and results shall be presented in the source test report for review. Omission of this critical information will result in rejection of the data, requiring a retest.
- 41.) A copy of a completed Source Test Audit Report (STAR) for all applicable Methods performed must accompany the submittal of the Source Test Report. A copy of the STAR forms is available electronically from the regional source test coordinator.
- 42.) In an attempt to conserve natural resources and to minimize storage space requirements, the test report should be printed on both sides of each page within the document. DEQ recognizes this may not be feasible for some supporting documentation (i.e. figures, maps, etc.).
- 43.) The source test report shall be submitted to the DEQ within 45 days following the completion of the source test.

DEQ understands that the source test is scheduled for April 26-28, 2016. If you have any questions, please contact me at (503) 378-5070.

Sincerely,



Mike Eisele, PE
AQ Source Test Coordinator
Western Region-Salem

cc: George Davis, DEQ: NWR-AQ File

File
26-3135



BULLSEYE

GLASS CO.

STATE OF OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
RECORDS
APR 11 2016
NORTHWEST REGION

3722 SE 21st
Portland OR
9 7 2 0 2
U S A

TELEPHONE
503 232*8887

FACSIMILE
503 238*9963

April 6, 2016

Oregon Dept. of Environmental Quality
Northwest Region, Air Quality
700 Multnomah Street, Suite 600
Portland, OR 97232

RE: Form AQ104C

I have attached a signed copy of form AQ104C for NC Application Number 028560. The baghouse is installed and in use. We will be resuming the usage of raw materials containing cadmium in the controlled furnace.

If you have any questions, or need any additional information, please do not hesitate to contact me.

Sincerely,
BULLSEYE GLASS COMPANY

Eric E. Durrin
Controller



A Glassworking
System



DEPT OF ENVIRONMENTAL QUALITY
 APR 11 2016
 NORTHWEST REGION

Print Form

NOTICE OF APPROVED CONSTRUCTION COMPLETION

**FORM AQ104C
 ANSWER SHEET**

Return this form within 30 days of completion of approved construction.

NC Application Number:	028560	
Permit Number (if applicable):	26-3135-ST-01	
Company Name:	Bullseye Glass Company, Inc.	
Street Address:	3722 SE 21st Avenue	
City, State, Zip Code:	Portland, OR 97202	
Contact Person:	Eric Durrin	
Phone Number:	503-232-8887	
Brief description of installed facility/equipment:	Baghouse installed on furnace	
Date construction completed:	04/04/2016	
Date placed in operation:	04/04/2016	
Do you wish to apply for tax credits? (yes/no)	NO	

Signature		
<i>I certify that the information contained in this notice, including any schedules and exhibits attached to the notice, are true and correct to the best of my knowledge and belief.</i>		
Name of official:	Eric E. Durrin	
Title of official:	Controller	
Phone number of official:	503-232-8887	
Date	04/06/2016	
Signature of official	<i>Eric E. Durrin</i>	

SUBMIT THE COMPLETED NOTICE OF APPROVED CONSTRUCTION COMPLETION FORM TO THE DEPARTMENT REGIONAL OFFICE SHOWN BELOW FOR THE AREA THAT THE SOURCE IS LOCATED:

Oregon Department of Environmental Quality		
Eastern Region, Air Quality 475 NE Bellevue Drive, Suite 110 Bend, OR 97701	Northwest Region, Air Quality 700 NE Multnomah Street, Suite 600 Portland, OR 97232	Western Region, Air Quality 4026 Fairview Industrial Drive Salem, OR 97302

logged 04/11/16 emc