



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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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-WLOT-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.

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