



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

May 6, 2021

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

RE: NESHAP subpart 6S monitoring and reporting

Mr. Durrin:

The Oregon Department of Environmental Quality previously determined that Bullseye Glass Co. is subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) subpart 6S for Glass Manufacturing Area Sources. As part of the requirements of NESHAP 6S, Bullseye was required to conduct a compliance source test and submit a Notice of Compliance Status (NOCS) following the test. As part of the NOCS, when only one of identical furnaces is tested, Bullseye was required to demonstrate that the glass produced in the tested furnaces represented the highest potential to emit glass making hazardous air pollutants, and that the emissions did not exceed 0.02 pounds of 6S HAP per ton of 6S glass produced. Bullseye submitted the NOCS and additional information DEQ requested to demonstrate compliance with 6S. The submitted documents analyze the HAP usage rates and emission potential to demonstrate Bullseye conducted the compliance testing while producing glass with the highest potential to emit glass making HAPs from the products Bullseye produces. The analysis also demonstrates that significantly more HAPs could be used per ton of glass produced without exceeding the 0.02 pound per ton of glass produced emission limit in 6S.

As a means of demonstrating continued compliance with NESHAP 6S, Bullseye has voluntarily agreed to the following:

- Monitor daily 6S HAPs used and glass produced in furnaces subject to 6S. This is done for the week ahead for planning and the week behind to ensure planned and actual are consistent.
- On a weekly basis, calculate the 6S HAP usage per ton of glass produced in furnaces subject to 6S. Again, this is done for the week ahead for planning and the week behind to ensure planned and actual are consistent.
- If, during the weekly calculations, any day is shown to exceed 157.5 (3x the amount used during 2017 source test) pounds 6S HAPs used per ton of 6S glass produced, Bullseye must report that information to DEQ within 10 business days and include the daily individual 6S HAP quantities and total daily 6S glass produced for the exceeding day(s).
- On a monthly basis, beginning with June 2021, provide DEQ the weekly calculations that show the daily 6S HAP usage per ton of 6S glass produced. If all of the monthly reports for calendar year 2021 demonstrate no exceedance of the 157.5 pounds 6S HAPs used per ton of 6S glass produced, the monthly reporting may be reduced to semiannual and submitted with the Title V Permit Reports.

If Bullseye fails to voluntarily maintain the monitoring, recordkeeping and reporting requirements listed above, DEQ will modify the Title V permit to incorporate the listed requirements [OAR 340-218-0200 and 340-214-0110].

If you have any questions about the requirements outlined in this letter, contact Dave Kauth by phone at: (503) 229-5053 or by e-mail at: dave.kauth@deq.state.or.us for clarification.

Regards,

Matt Hoffman

Matt Hoffman (May 5, 2021 15:41 PDT)

Matt Hoffman, Manager
Northwest Region Air Quality

cc: Source File
John Keenan, EPA Air Enforcement Specialist