**Ideas for changes to the art glass rule:**

**Changes under consideration:**

* Demonstrating 99% control efficiency may be very difficult for facilities that don’t have a lot of PM coming into their baghouse.
  + Allow them to show compliance with a baghouse / bag design spec (designed for 99.5% capture?)
  + Or, create an alternate standard based on grain loading at the outlet?
  + Or, could a surrogate PM be injected for testing purposes?
  + “other test as approved by DEQ”
  + Allow grain loading for Tier 1 and for Tier 2
  + Require baghouse leak detection system for Tier 2s?
* 9040(3)(a)(B) allow Tier 2s to measure for chrome conversion at outlet of control device, don’t need to measure at inlet of control device.
* Clarifications:
  + Clarify that facilities can operate between permit application and permit issuance?
    - Intent is that existing facility must apply by deadline, can operate until DEQ issues permit. Did not decide whether rule language change to clarify this is needed.
    - Intent is that a new facility must get permit issued before constructing. Add line to 9020: “Sources constructed after September 1, 2016 must obtain a permit prior to construction.”
  + Is furnace a 'controlled furnace' as soon as baghouse is installed, or does it have to wait until the source test has been performed (or source test results received?)
    - Intent is that it is ‘controlled’, can be operated until source test results available. Did not decide whether rule language change to clarify this is needed.
* Change the 24-hr benchmark for hex chrome, if/when OHA has a revised number? (It’s incorporated at OAR 340-244-9040(3) and (4).
  + Likely will want to change # in art glass rule if/when OHA has a new number. If OHA is able to suggest a new number by the end of public comment period (7/29) they could submit it as a public comment and DEQ would have option to change the # in the rule accordingly. Emil and Meyer think this type of change would not require re-noticing- because rule is new, entire rule text is in scope of public comment/notice.
* Allow use of a mass balance approach to estimate emissions (measure amount in final product + amount in raw materials, assume the rest is emitted?) (Abe Fleishman, Northstar 5/17/2016 phone call)
  + Did not discuss during 7/6/2016 conversation. This may be moot since revision to 99% control efficiency standard should reduce the cost of the source test.

**Changes we’ve decided not to consider further**

* for Tier 1 facilities, treat cadmium like chrome VI and don't allow use of it in uncontrolled furnaces? Cd has a low melting point so only 20% ends up in the final product, presumably 80% goes up the stack. (Abe Fleishman, Northstar 5/17/2016 phone call)
  + This may be a moot point. No Tier 1s are planning to go the uncontrolled + modeling route.
* Lower the threshold for rule applicability, to capture facilities making glass in their garages? Apparently there are two garage glassmaking operations in Eugene. (Abe Fleishman, Northstar 5/17/2016 phone call)
  + Not at this time. Maybe smaller garage facilities could be regulated by zoning or handled by the bigger rulemaking. Keep at 10 tons unless public comment gives justification for some better number.
* Should the rule apply statewide? (Suggested by the 5 CAGMs subject to the rule, as part of a fiscal advisory committee meeting.)
  + Are there any facilities outside PDX that would be subject?
  + Leave this as PDX-only, could be replaced or extended statewide when the bigger risk-based permitting rule moves forward.