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

* 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.
	+ 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.
* 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.
* 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)
* 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)
	+ Maybe smaller garage facilities could be regulated by zoning or handled by the bigger rulemaking. Keep at 10 tons.
* 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.
* 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).