**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?
* Clarifications:
	+ Clarify that facilities can operate between permit application and permit issuance?
	+ 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?)
* 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)
* 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)
* Should the rule apply statewide? (Suggested by the 5 CAGMs subject to the rule, as part of a fiscal advisory committee meeting.)
* 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).