**Art Glass Permanent Rulemaking**

Comments summary (beginning of day 7/29/2016)

1. Consider economic impact on glass artists, don’t shut down CAGMs, give them more time or flexibility [glass artists]
2. Include all metal HAPs or all HAPs in rule [EPAC members]
	1. “Close loopholes that would allow for emissions of heavy metals from uncontrolled furnaces”
3. Make rule apply statewide [EPAC members]
4. Update health benchmarks [EPAC members]
5. Include all glass manufacturers (include General Glass and Owens-Brockway, not just art glass) [EPAC members]
6. Replace 99.0% baghouse source test standard
	1. Use 99.9% [EPAC members]
	2. 0.005 gr/dscf [Glass Alchemy]
	3. 0.2 lbs/ton of glass produced [Bullseye]
7. More transparency
	1. Online video of all public meetings
	2. Online searchable database of air permits or emissions info
	3. “ensure public notice and comment instead of locking the public out of DEQ decisions”
8. Replace 10 tpy applicability threshold
	1. Everybody that melts glass should have to report, define threshold lbs/year usage rate for each metal. All above that threshold are subject to the other parts of the rule. [Glass Alchemy]
	2. Use 1 lb/year [EPAC]
9. Replace Cr6 benchmark in rule
	1. Use 0.08 ng/m3 as 24 hr limit. Mentions ASTDR 2-week number. (EPAC)
10. Tier 2 chrome usage rates
	1. allow testing for total Cr at outlet of baghouse (Method 29) and assuming all of it is Cr6. [Bullseye]
11. What about non-filterable emissions? [EPAC]