From: marco.circosta@multco.us on behalf of Multnomah County Chair
To: Multnomah County Chair
Subject: Multnomah County Chair Letter to Department of Environmental Quality
Date: Tuesday, March 15, 2016 12:29:43
Attachments: Letter to DEQ - March 15 2016.pdf

Deborah Kafoury
Multnomah County Chair

501 SE Hawthorne Blvd., Suite 600
Portland, Oregon 97214
Phone: (503) 988-3308
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March 15, 2016

Joni Hammond

Department of Environmental Quality

811 SW Sixth Avenue

Portland, Oregon

Dear Director Hammond,

I was concerned when I received copies from your office of the letters dated March 8 to Bullseye Glass Co. and Uroboros Glass Studios, Inc from the Oregon Department of Environmental Quality (DEQ). The agency's decision to allow the resumed use of chromium at Bullseye and Uroboros, as outlined in the March 8, 2016 letter to those companies transpired without public input and is premature.

The resumed use of chromium, even under the conditions outlined in the letter, could put families and individuals living near those facilities at increased risk. The DEQ is essentially proposing an experiment to determine if chromium 3 is converted during the manufacturing process into the more toxic chromium 6 and emitted into the air. This type of experimentation is not appropriate in close proximity to schools, neighborhoods, and childcare facilities, and without consent from the people directly impacted.

I am calling on DEQ to take the following actions:

- **Mandate best available emissions control technology:** Suspend heavy

metal use at Bullseye and Uroboros until effective emission control technology has been installed and verified as effective.

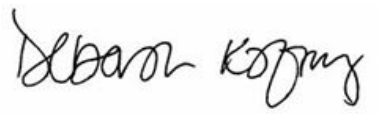
- **Allow public comment on temporary rules:** The public has a right to weigh in on temporary rules related to emissions of heavy metals from the glass manufacturing sector in Portland. The abbreviated timeline for temporary rulemaking does not allow for adequate public input, nor will closed door rulemaking build trust with the public. I join with other voices in asking for a 14 day public comment period.

- **Establish a clear timeline.** I am renewing my call for the state to provide a timeline and specific regulatory strategies that will be employed to comprehensively address air toxics.

We have all heard the understandable confusion, fear and anger from residents who live near these facilities. If the DEQ cannot verify safe levels of toxic heavy metal emissions that will not exceed ambient health-based benchmarks, then the agency should not be rushing to enable these emissions to recur.

Nearby residents have a right to expect that the health of their children is being protected by the DEQ, not negotiated away behind closed doors.

Sincerely,



Deborah Kafoury
Multnomah County Chair

Cc: Governor Kate Brown

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