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Subject:	March 15, 2016, DEQ rule change meeting
Date:	Monday, March 14, 2016 23:50:31

Dear Regulators and Elected Representatives,

I am writing to you in regard to the just announced DEQ special meeting to be held on March 15, 2016 for the purpose of considering rule changes directed at Oregon Colored Art Glass Manufacturers.

I have read the DEQ proposal for new temporary rules to be considered for adoption at this meeting as outlined here: http://www.oregon.gov/deq/EQC/Documents/2016/031516eqcAgenda.pdf

I live in the Portland area and consider myself to be an environmentalist. As such, I applaud the intent of the DEQ to protect our air quality and the health and safety of those living in the neighborhoods near Oregon's glass manufacturing facilities. However, I feel that these proposed new rule changes are misguided and will not help achieve that goal. I am also a glass artist and am concerned for the well-being of Oregon's colored art glass manufacturing industry, those employed in that industry and those dependent on the products of that industry. In the recent furor over air contamination possibly coming from local glass manufacturing facilities, I think that these latter two constituencies have been largely overlooked.

Due to what I consider to be largely irresponsible, sensationalistic news reporting on this matter, the public demand for immediate action has been extreme. I feel that these proposed new rules are an unwarranted over reaction that will not improve the situation. Two recent soil test studies, have already shown that the severity of the problem isn't nearly as great as what was originally feared and both of the Portland glass manufacturers cited as possible sources of pollution, Bullseye and Uroboros, have already taken actions to eliminate the use of, and therefore the potential for, releases of the identified hazardous materials. These actions, taken voluntarily and at significant sacrifice to these businesses demonstrate the good will and concern that both have for the air quality in our community.

The new rules proposed by the DEQ would force these businesses to make even more significant reductions in their production. The specific change that the new rules would enforce would be the elimination of the use of Chromium III because of the potential for this material to be transformed during production to a hazardous form; Chromium VI. Note, that the proposed DEQ rules also mistakenly make multiple references to another material, Chromium IV, which is indicative of the haste and lack of review with which these proposed rules were drafted. Although the potential conversion of Cr III to Cr VI does exist, glass manufacturers have the ability, and in-fact, the necessity, to prevent such conversion from occurring during the manufacturing process. If they did not, their process would not yield the green glass color they were aiming to produce and their production would be wasted. The scientific reasons behind this are explained by Dr. LaCourse of Alfred University here: http://www.bullseyeglass.com/about-us/dr-lacourse-chromium-statement.html.

In short, it would serve no purpose to restrict the use of Cr III by these glass manufacturers, but it would cause significant harm to both of these companies above and beyond that already resulting from their voluntary actions. The DEQ rule proposal identifies the public and the colored glass manufacturers as parties that would be affected by these proposed temporary rules. Their estimation of how the glass companies would be affected completely overlooks the impact of forcing them to further curtail their production, the layoffs that would follow, and the very real potential for the businesses to be forced to shut down entirely.

Oregon should be proud of and should help promote its home grown art glass industry. To my knowledge, there are only three companies in the world that make significant quantities of the type of art glass that can be readily used by fused glass artists, and we are fortunate to have two of them located here in Portland. Beyond the effect on the local economy, these unnecessary and scientifically unsupported new rules would also negatively impact the thousands of glass artists worldwide that depend on the products of these companies for their livelihood, potentially destroying the entire fused art glass industry.

I hope that you will lend your voice to help DEQ understand that we need a balanced, reasoned and scientifically supported solution to this air contamination problem and not an ineffective, knee-jerk reaction as represented by these proposed rules.

Sincerely,
Bob Heath