From:	Ellen Abbott
To:	HAMMOND Joni
Cc:	SAXTON LYNNE; REP Nosse; REP VegaPederson; Gabriela.GOLDFARB@oregon.gov; mult.chair@multco.us; mayorcharliehales@portlandoregon.gov; dan@portlandoregon.gov; nick@portlandoregon.gov; Amanda@portlandoregon.gov; novick@portlandoregon.gov
Subject:	re the proposed restrictions on Bullseye Glass factory
Date:	Tuesday, March 15, 2016 06:58:17

Dear Sirs and Madams,

Scientific testing has shown that the ground around the Bullseye Glass factory is not contaminated and neither are the children in the area. Both DEQ and EPA have acknowledged there is no clear evidence of acute or chronic health risks based on Bullseye's use of Cr(III), which is a harmless and naturally occurring compound. Scientific evidence clearly indicates their furnaces cannot turn Chromium III into Chromium VI. If they did, their glass would be ruined. Scientific evidence shows their use of the compound is not harmful. Even so, Bullseye Glass is voluntarily installing baghouses on those furnaces. Nevertheless, DEQ wants to restrict Bullseye from using Cr(III) for an extended period of time. They are essentially basing these rules off an assumption of guilt without any supporting evidence.

I fail to see how shutting them down will benefit anyone. The employees at the factory will lose their jobs, glass artists all around the world will be affected and will also lose income, myself included. Neither DEQ or EPA have required any other US producer, of green glass, to entirely and arbitrarily stop their production without notice and perform the kind of extensive testing and modeling that DEQ is asking for. A typical green bottle manufacturer uses 1,000 times more Cr(III) per year than Bullseye Glass. A bottle producer, with emission controls, would melt more Cr(III) each day than Bullseye uses in a year.

If you support these restrictions then you must by rights impose them on all green glass makers which I think we can agree is not something that anyone wants done. Please base your decisions and support on scientific evidence instead of fear without proof. Bullseye Glass is a responsible company and they are already doing or have agreed to take measures that the largest users of ChromiumIII do not and are not asked to do.

Sincerely,

Ellen Abbott
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