From:	Monica Garcia-Alonso
To:	Monica Garcia Alonso
Subject:	Bullseye glass: Air Quality 2016 Temporary Rules meeting
Date:	Tuesday, March 15, 2016 05:57:21

Dear Sir/Madam,

I am writing to you with regards to the proposed measures that may be imposed on glass production at Bullseye glass, Portland. My understanding is that these proposed measures have arisen from the concern that Cr(III), a harmless and naturally occurring compound, will be converted into its more harmful form Cr(VI) during the production of Bullseye glass and that this will lead to harmful levels of exposure to humans. However, Bullseye have been using Cr(III) responsibly and the processes they use in glass making do not produce toxic chromium (Cr(VI)). So environmental exposure to chromium from the production of bullseye glass will be exposure to Cr(III) not Cr(VI). Regarding hazard, 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). Humans are regularly exposed to Cr(III) from natural sources as well as industrial production. Bullseye have commitment to monitor emissions of Cr(III) and keep them within the allowed levels, therefore it can be expected that the risk of harmful effects in humans will be low. It is important to note that other glass manufacturers in the USA are known to use much higher amounts of Cr(III) than Bullseye on a yearly basis and this has been deemed safe, so there are precedents of previous exposure to Cr(III) at higher levels with low risk. This means that the lower levels of Cr(III) emitted by Bullseye production will also result in low risk . Taking into account this information, I would like to urge DEQ to rely on the available scientific evidence and to use standard risk assessment approaches (taking into account hazard potential and exposure) before imposing these strict rules. There is no doubt that the protection of humans living in the vicinity of glass factories is essential, but public pressure and political motivation should not drive the imposition of disproportionate regulations.

Best regards

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