From: marjorie
To: INAHARA Jill
Subject: Temporary Rule Colored Art Glass Manufacturing
Date: Wednesday, March 30, 2016 14:43:04

Hello Jill,

I tried to submit online but not sure if the comments made it through when I pushed the submit button

Thank you for the opportunity to review and very briefly comment on the proposed temporary rule for colored art glass manufacturing facilities.

Background. The release of toxic air pollutants is a widespread issue that has been under-addressed in some states. The National Emissions Standards for Hazardous Pollutants (NESHAPs) primarily address larger (major) sources. But not unlike criteria pollutant programs that simply target major sources, there remains an important gap that fails to protect human health and the environment from the impacts of the myriad of smaller sources. These sources, singularly and collectively, have the potential to adversely affect not only the local community but also more distant locations through environmental transport and deposition of toxic and criteria pollutants.

Current Situation. The Oregon Ambient Benchmarks for Air Toxics establish protective goals but it is not clear how and when these goals are translated into meaningful and enforceable protective measures. It is my observation that identification of the two small Colored Art Glass Manufacturing (CAGM) facilities in Portland as sources of heavy metal contaminants in their respective neighborhoods is not a unique situation. Many types of smaller sources of toxic air contaminants from currently unregulated industries, businesses, agricultural operations, and transportation exist that have the potential to adversely impact communities and residents across the state. Having to take each of these on individually is neither efficient nor protective. While many toxics programs focus on immediate needs, the potential for buildup of pollutants, especially heavy metals and other persistent toxics substances, is great both within the facility boundaries and in the surrounding environment.

Recommendations. While I wholeheartedly agree with taking short-term temporary measures to protect the CAGM affected neighborhoods, it is my request that DEQ develop and implement a broader program for controlling releases from non-NESHAPs regulated sources of toxic air pollutants. There are a number of really good state programs across the country to draw on and simplify the process. In addition, the great work that has already begun on Ambient Benchmarks provides a good starting point. I, therefore, provisionally support a temporary rule with the caveat that it be tied to a high-priority, broader, definitive, and permanent toxic air pollutant rule for all sources of inorganic and organic airborne contaminants with a real potential to affect human health.

Respectfully,
Marjorie MartzEmerson
Joseph, Oregon