**Art Glass Permanent Rulemaking 2016**

**Public Comments and Draft Responses**

**Comment categories**

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| 1. **Wants more compliance time or flexibility**   **Example (from commentID #2)**  …We all want cleaner air. We all want a thriving economy and jobs. While Bullseye employs about 125 people, many thousands of people depend on their success worldwide to support their families and to pay taxes. They export about 35% of their production. They are a strong contributor to our community both in special projects and income. Bullseye attracts tourism revenue in many of our service sectors due to classes, tours and retail sales of products.  Bullseye is at present adding baghouses to their furnaces that will allow them to produce glass with 99.9% filtration rate. It is difficult to meet the deadlines for installation when nearly 80% of production had been shut down for a period of time, and at present are strictly limited, with limited impact on air quality.  As recent air monitoring data has shown, there has been little change in air quality since Bullseye has been limited in their production. That points to a stronger likelihood of other bigger contributors in the neighborhood. Please use objective scientific methods and data and consult with glass professionals for advice in making sound decisions when developing pollution control solutions for the glass art industry. Please be fair in application of rules to art glass manufacturers. Please consider the impact on jobs, tax revenues, and the limited win on pollution control when applying subjective and stringent rules on the glass industry with short notification in relationship to the environments they operate in. This effort has a huge financial impact and may well cause production to shift overseas. Sending production to China will not clean our air. It will not support the Oregonians who work in the art glass industry, nor any of those across our continent and the rest of the world. It will not provide any tax revenues.  Thank you for your time. Please consider using scientific data to have a real impact on our health and air quality, on art and our economy as changes are made in environmental regulations.  Sincerely,  Melody Roth  **Answer:** |
| 1. **Consider economic effect on glass artists**   **Example (commentID #10)**  Good afternoon, I am writing to let you know how important my ability to obtain the beautiful glass of Bullseye is to my business. I have a small but nice fused glass business in Atlanta, GA. I do not know how my business can continue if the glass Bullseye produces is discontinued. I do believe we should not taint the air we breathe and sincerely hope all the parties involved will seek a reasonable and mutually beneficial solution so that I can continue in my business. Thanks, MM  **Answer:** |
| 1. **Other sources pollute too**   **Answer:**  DEQ has begun the Cleaner Air Oregon rulemaking process to develop a statewide risk-based air toxics program that will cover many industry types. |
| 1. **Don’t shut down glass industry**   Sdf  Answer: |
| 1. **Supports applying rule statewide**   **Answer: [are we extended to statewide?]**  DEQ has begun the Cleaner Air Oregon rulemaking process for a statewide risk-based air toxics program that will cover many industry types. There will be many opportunities for public input and participation in that process. DEQ is currently reviewing risk-based air toxics programs from California, Washington, and other states to help inform new risk-based regulation in Oregon. |
| 1. Supports lowering 10 tpy threshold   **Answer:** |
| 1. Supports including more metals in list   **Answer:** |
| 1. **Supports higher capture efficiency (99.9%)**   **Answer:**  DEQ agrees that baghouses are capable of capture efficiencies higher than the 99% standard in the temporary rule. However, |
| 1. **Supports revised health benchmarks**   **Answer:**  The Oregon Health Authority is advising DEQ on the correct health benchmarks to use. Based on the comment submitted by OHA, DEQ is changing the 24 hour health benchmark for hexavalent chromium (Cr6) from 36 ng/m3 to 5 ng/m3. OHA is beginning a process to review and revise other health benchmarks. If OHA revises other benchmarks as part of that process, the updated data could be incorporated into the art glass rule in a future rulemaking. |
| 1. Supports including all glass manufacturers   **Answer:**  Large scale bottle manufacturers are already subject to regulations that require control devices and reductions of emissions through technology based standards. This proposed rule is applicable to a different industry with different emissions and impacts. Additional health risk impacts from large bottle manufacturers may also be addressed as part of the permanent rulemaking mentioned in other comment responses. |
| 1. Wants this rule to be "health-based"   Answer: |
| 1. Wants more public involvement   Answer: |

Detailed comments: