From:	Taylor-Norbu, Terry
To:	WESTERSUND Joe; B Skinner
Cc:	OregonAirToxics; artglass2016
Subject:	Art Glass Permanent Rules 2016. Attn: Advisory Committee
Date:	Wednesday, June 15, 2016 5:12:13 AM

Ref: Bullseye/Uroboros – Oregon Department of Environmental Quality

Dear Mr. Westersund,

The Indiana Glass Guild fully supports improved emission control systems, corporate responsibility , and a clean environment. We care about the effects that manufacturing can produce, but we also place high emphasis on scientific fact. The temporary rules that are being imposed on the glass manufacturing companies, Bullseye and Uroboros, are not being investigated fairly through scientific testing. Our organization fears that hastily written regulations will have a harmful ripple effect across this nation, causing irreparable harm to the stained glass industry by taking away some of the very materials used in our craft.

Each sheet of glass produced at both of these facilities is handcrafted by experienced glass workers. The art glass being produced by these two companies is unique only to Portland and is not produced anywhere else in the world. To saddle these companies with hasty regulations based on unsubstantiated facts could shutter these businesses and disrupt the operations of thousands of small businesses around the world.

Bullseye and Uroboros's survival is at risk by the DEQ's prescribed limitations that force production to just 20% of glass products for 6 months. This ruling would disregard any ongoing test results or emission controls added to their facilities. The health and safety of the neighborhood community can be achieved by the DEQ working with these companies to find real solutions that address and solve the immediate health concerns. Regulatory decisions must be based on science, not political issues. A leading scientist, Dr. William LaCourse of Alfred University, has said Bullseye's furnaces to not burn hot enough to produce toxic chromium. If it did, it would ruin the glass being produced. We urge DEQ to rely on science and fact and not to rush to impose these poorly written and misdirected rules. As it stands now, this proposed, temporary agreement terminates in five years or when DEQ issues a new permit that incorporates any new toxic air provisions and regulations adopted by the EQC. This agreement places a burden on these companies to hit a moving target because money they spend now on compliance may need to be increased over and over again as new regulations are issued. This could be detrimental to their businesses and the entire glass art industry.

Again, we strongly urge the DEQ to work with Uroboros and Bullseye to find equitable solutions to these important issues and to deal with good scientific facts and data.

With kind regards,

Terry Taylor-Norbu
President of the Indiana Glass Guild