From:	WESTERSUND Joe
To:	FELDON Leah; PALERMO Jaclyn; INAHARA Jill; GARRAHAN Paul; SWAB Christopher; KAUTH Dave; GRUNOW Greg; DAVIS George
Cc:	artglass2016
Subject:	FW: Small unregulated CAGMs in residential neighborhoods
Date:	Monday, June 13, 2016 8:28:21 AM

FYI- written comments from Al Hooten recommending that the art glass rule threshold be lowered & it be made applicable statewide.

-Joe

From: Al Hooton - Glass Alchemy [mailto:al@GlassAlchemy.com]
Sent: Friday, June 10, 2016 2:01 PM
To: WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us>
Cc: Al Hooton - Glass Alchemy <al@GlassAlchemy.com>
Subject: Small unregulated CAGMs in residential neighborhoods

Mr. Westersund,
Glass Alchemy is sending this letter to you as our current contact within DEQ. There is a rapidly growing unintended side effect of the temporary rule currently in effect regarding airborne emissions from Colored Art Glass manufacturers (CAGMs). This unintended side effect will have a significant negative effect on air quality in exactly the worst locations: residential neighborhoods. In this communication we will provide characterization of the unintended side effect, provide links that allow interested individuals to begin research regarding what is developing, and provide our comments regarding how to address this problem with a simple change to the rulemaking currently underway.

The temporary rule (and, as we understand it, work on the permanent rule) includes a minimum threshold for applicability of 10 tons of finished colored art glass produced annually. Beyond the problem of this being obviously arbitrary with no science behind it, there is a much larger problem now being created with direct impact on air quality: small melting operations are springing up across the country that operate below this limit, including many in Oregon. There are different scenarios, but the most common is a glass blower in his/her garage who is choosing to melt their own glass in a small number of furnaces. These individuals are largely uneducated with respect to glass chemistry, but have gathered information and opinions off the internet and have decided they now know how to make their own colored glass. These furnaces have no emissions controls on them whatsoever, and they are largely situated in residential neighborhoods. These individuals may also be prone to using far too much in the way of metals and other chemicals due to their lack of knowledge, and much of the extra quantity of these materials will burn off and be directly emitted to the air in their neighborhoods.

We very closely follow the social media related to all aspects of art glass in North America and abroad. There are numerous chat groups, forums, facebook groups, etc. where it is possible to find dozens of people discussing how they do this, just in Oregon alone. Most alarming is the rapid growth trend we are seeing in this direction. Should anyone at DEQ wish to begin their own research on this topic, we would suggest the following facebook groups as

a starting point:

Public: Borosilicate Glass Chemistry Open Discussion :
https://www.facebook.com/groups/BosilicateGlassChemisty/

Closed: Glass Color Awareness: https://www.facebook.com/groups/glasscolor/

Closed: Torch Talk: https://www.facebook.com/groups/TorchTalk/

We believe this trend poses significant risk of causing far more health-related impacts than the risks the current rulemaking activities are going to address. However, it seems to us there is a relatively simple solution: expand the rule to include *__any__* operation that melts glass using the materials of concern (heavy metals, etc.). We are aware that DEQ does not have the resources to launch enforcement activities across the potentially hundreds of sites across Oregon this would include, but if the penalties for violation were to be severe we feel the vast majority of these types of operations would not continue, and the impact on air quality in residential neighborhoods would be minimized.

Thank you for your time in reviewing this communication, Mr. Westersund. Please feel free to contact us at any time if DEQ would like to discuss this matter further with Vitreal, Inc. (DBA Glass Alchemy).

Best Regards,
Al

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