From:	WESTERSUND Joe
To:	"Leora Druckman"
Cc:	artglass2016
Subject:	RE: Art Glass Permanent Rules 2016. Attn: Advisory Committee
Date:	Thursday, June 02, 2016 5:55:54 PM

Hi Leora,

Thank you for your comment on the art glass permanent rulemaking. I am reading each email as it comes in but am not able to respond individually to each comment at this time.

Though I'll read your comment now, please note that to have it entered into the official record for this rulemaking, you'll need to submit your comment during the public comment period, which is currently planned to run from June 15th through July 29th. DEQ will also hold a public hearing in mid-July. If submitting comments in writing, the preferred method is via a comment tool that will be posted to the website once that period begins.

For further info about the rulemaking or to sign up for email updates, please go to: http://www.oregon.gov/deq/RulesandRegulations/Pages/2016/Rartglass2016.aspx

Thank you for your time and involvement in this issue,

-Joe

From: Leora Druckman [mailto:leorad@aol.com]
Sent: Thursday, May 26, 2016 9:27 PM
To: DEQINFO <DEQINFO@deq.state.or.us>; WESTERSUND Joe <WESTERSUND.Joe@deq.state.or.us>
Subject: re: Art Glass Permanent Rules 2016. Attn: Advisory Committee

To members of the Advisory Committee regarding the economic impact of Art Glass Permanent Rules.

Why closing Bullseye means the death of an international industry.

I make glass art, not for a living, but simply because I love it. But, I respect the many tens of thousands of people around the globe who depend on art glass for their living. This includes talented artists who make beautiful works of art by cutting, melting, shaping, casting and blowing this amazing material. It includes the galleries that sell these works of art; the many wholesale and retail businesses that sell glass tools and materials; the instructors who make their living teaching this ancient craft; the manufacturers of kilns, glass tools, enamels and other additives; and, of course, those who make art glass - the specialty glass required for almost all of today's modern glass crafts. Bullseye is, by far, the primary producer of art glass in the world. Without Bullseye, the art glass industry may cease to exist.

But how can a single producer in an industry this large have such a huge impact? Aren't there other colored glass producers in the world?

Yes, other companies produce colored glass, but only a few produce colored glass that can actually be used in creating art glass. There are a few producers of colored glass who make glass primarily used to create stained glass, but the glass they make can not be used when creating blown, kiln melted, lampworked or cast glass art. All of which combine multiple colors of glass under high heat and constitute the vast majority of glass art today.

There are only a few companies that make glass that can be used in this way. The largest and most experienced is Bullseye. Bullseye is the only major producer of 90 COE (coefficient of expansion) glass. Most glass artists use either 90 COE or 96 COE glass. In fact, many restrict their studios to one or the other. Why? While two pieces of colored art glass may look exactly alike, when pieces of COE 90 and COE 96 are combined though heat, hours or even months of work can be destroyed. Glasses with different COEs pull away from each other in heat, causing cracks, warping, breaking and often, one big mess.

Bullseye created and perfected the manufacturing processes and technology for producing glass that is COE compatible across an entire product line. Before Bullseye did this, most of the magnificent glass art you see today would not have been possible. Because of their vast selection, rigorous 90 COE testing, high quality and excellent (and very generous) production of educational materials, most in the art glass business primarily stock and use Bullseye glass. The only other major competition comes from producers of COE 96 colored art glass. COE 96 glass is produced almost exclusively by two businesses, Spectrum glass (which just announced that they are going out of business) and Uroboros. The 90 COE and 96 COE glass manufacturers have provided healthy competition with each other in an industry with few competitors. The majority of the rest of the glass produced in the world is of uncertain and/or inconsistent COE and therefore unusable for making most art glass.

Usually, businesses do not rely primarily on one supplier for their business needs. Because of the difficulty of producing quality, COE compatible glass, the art glass industry is different. Bullseye is the only major producer of COE 90 compatible glass. Even if everyone in the art glass business attempted to switch to COE 96 glass, many businesses would go under due to the cost of switching all their glass and supporting materials. The art glass industry (like many businesses) is still recovering from the recent recession. Also, due to the death of Spectrum, it is unlikely that enough COE 96 glass in the needed range of colors will be available as soon as it would be needed. And, if Uroboros receives the same treatment as Bullseye, it may end up out of business like its sister Spectrum.

Please consider this unique and valuable international industry when making decisions involving Bullseye. Clearly, the company is showing a willingness to improve their impact on the environment as they have already started implementing filtering systems and have offered a plan for reduced emissions. Consider giving time for the company to adjust so it can continue to survive while making these important decisions. And, be very, very sure that the data you are using to make these decisions is accurate and actually leads to any conclusions you decide to make before you destroy a entire industry.

Public health and a clean environment are extremely important. But, before making decisions that are likely to destroy an important industry and the tens of thousands of jobs worldwide that depend on it, please take the time to work together with a company that is very willing to

work with you. It is possible to have both clean air and a thriving Oregon based art glass industry at the same time.

Thank You,

Leora Druckman
Ann Arbor, MI
735-769-0310

Sent from my iPhone