

In March of this year we learned that there was an active issue with air pollution in the city of Portland. Focus quickly centered on what is representative of a fraction of industry in the city, that being colored art glass manufacturing. While Northstar Glassworks, as a tier one manufacturer, does not currently use nickel, arsenic, lead or hexavalent chromium we do utilize cadmium. Despite operating below the safety benchmark for this metal we decided to stop all cadmium glass production at that time. We do recognize the dangers related to elevated levels of cadmium in our environment and strongly suggest this metal be added to the list of regulated emissions. This was a proactive response towards a health based standard for industry and we immediately began the engineering for our solution to this problem, ahead of any legislation or mandates issued by the city or state level. Since then we have been witness to temporary rules that are clearly industry based as well as a runaway system of rulemaking that fails to achieve the stated goal. In our estimation, these rules were written to get the issue off the front page news and to placate the public into thinking the issue of air pollution in Portland had been easily solved. It is obtuse for the DEQ to believe this issue properly handled while not taking into account other industry in Portland such as plating manufacturers, metal fabrication plants, diesel truck emissions, railroads or bottling manufacturers. In the least, establishing a protocol for discovery regarding the existing benchmark levels of pollution outside of colored art glass manufacturing is needed for the safety of public health.

An example of the industry based approach used by the DEQ is the creation of a limit by weight of total lbs. of glass produced before said regulation takes effect. This has been set to 10,000 tons regardless of the composition of the glasses produced. What we are most concerned with is how much toxic metals are in the air as an aggregate, not by just limiting the size of one manufacturer. It would be in my benefit, in this case as a glass manufacturer, to create a network of satellite production facilities which would handle all of our toxic metals and maintain the less than 10,000 tons a year threshold, effectively skirting the nature of these regulations. Colored art glass manufacturers, and for that matter, any facility releasing these metals into the air needs to be regulated to meet the true nature of health based standards. The only difference for a "smaller" manufacturer would be the scale of the emission control device required.

There has been a significant amount of education for the regulatory, manufacturing and civic parties in this process. Learning to identify the present dangers as well as how to respond and regulate them have come so fast that some technical aspects of how to do this have been developed without enough information do so efficiently or correctly. This is present particularly in the source testing recommended by the DEQ to the EQC and written into the temporary rules. As it stands, Tier 1 manufacturers would be relegated to the "99% requirement" source test that is not only unsound but ineffective. Under the "99 % requirement" testing method we will be collecting sample air on the inlet to our hoods as well as to the outlet of the emission control device and would take no less than 30 days to do so. In the procedure of this testing method Northstar Glassworks will be held accountable for the existing unsafe levels of pollution related to our neighboring industries (railyard, diesel shipping, plating manufacturers, metal fabrication shops and bottling manufacturers). A much simpler and effective "grain load" test which has been suggested by our environmental consultant as well as the manufacturers of the emission control device would measure the output of metals from our factory

while yielding no margin of safety to the "99% requirement". In addition to holding the same benchmark for safety the "grain load" test would take less than one day and represent a much more effective and accurate method in which to safeguard the community in which we live and work.

I urge the DEQ and EQC to work with industry as well as the public, utilizing our combined experience and knowledge, to address this issue creating health based standards while implementing effective and timely resolutions to resolve the air pollution problem in our city.

Thank you for your consideration

James Knox

General Manager

Northstar Glassworks

8228 SE 26th Place

Building A

Portland, OR 97202

866-684-6986 Toll Free

503-684-6986 Phone

503-670-0978 Fax

