

To The DEQ,

Thank You for the opportunity to comment on the proposed rules for Colored Art Glass Manufacturers.

I've been in the colored art glass manufacturing business for over 30 years. Trautman Art Glass is one of 3 tier 1 manufacturers in the Portland area covered by the new DEQ rules. The other 2 are Northstar Glassworks, which I started in the 80's, and Glass Alchemy, started by a Northstar employee.

Along with the two tier 2 manufacturers, Bullseye and Uroboros, Portland is unique in having such a concentration of colored glass companies. Together we provide hundreds of jobs in a growing market, and millions of dollars in tax revenue to the Portland area.

But not all colored art glass companies are the same. We vary in size radically, and utilize vastly different processes to make the glass. We at Trautman are probably the smallest of the smaller tier 1 manufacturers.

The colored art glass manufacturing temporary rules now being considered were done in haste and have presented glass manufacturers with some unintended negative consequences. Even the DEQ has admitted this. The rules were written and put into temporary law before the DEQ even asked what we do and how we do it.

The rule, as written today, is OK, with one HUGE exception: Testing of the pollution control device installed would be prohibitively expensive for the, very small, tier 1 manufacturers. This is mainly because we emit such a small amount that it would take up to a month of testing, or longer, for the very smallest of us. So the smaller you are, and less you emit, the MORE expensive it would be to do the testing. We have been quoted nightmarish numbers, like \$300,000, to do the testing. In addition, the longer a test takes to run, the less accurate they actually become. So those of us least able to afford such expenses would be burdened with the highest costs. Absurd! This kind of expense could cause the smallest of us to go out of business along with all the jobs we provide. There must be a better alternative.

Additionally, the whole concept is flawed. It's like if you bought a \$30,000 car, new off the lot, and the DEQ required you to pay for a \$90,000 test to prove that the emission control system works as advertised....

The air filtration devices we are buying have been engineered and utilize hepa filters that are warranted to do what they advertise, just like the car emissions devices and airbags.

At the very least, if the DEQ insists on such an impractical test they should subsidize the cost. Isn't this what they do for car emissions testing already? Or change the rule.

As far as the 10 ton rule and the State wide rule, I do not see that it would make much difference. Most of the small (less than 10 tons) "garage" color companies that would be affected are out of state anyway. Some companies may see this as a way to gain control over competition. It has nothing to do with air quality. Make the rules nationwide and THAT I would whole heartedly support. If the rules put one of us out of business, it would only boost sales for the others. So DEQ risks becoming a pawn in a competitive marketplace.

We face competition from China, India and the EU. Don't make this another example of American jobs being sent overseas.

In conclusion, I want to be clear that I support clean air, water, soil and a safe workplace. I don't mind spending money to assure the public (and DEQ) that no harm is being done. I have always been a safety conscious and an

environmentally conscious glass maker. But please don't harm what is becoming one of Portland's most unique and growing industries by imposing unrealistic testing requirements.

Sincerely,

Paul Trautman, Jr.

President , Trautman Art Glass, Inc.