



BULLSEYE

GLASS CO.

June 22, 2017

Dave Kauth
Keith Johnson
Oregon Department of Environmental Quality
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Portland, OR 97232

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TELEPHONE
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RE: Bullseye Glass Co., Portland, Oregon
Chromium Allowance Request

Dear Keith and Dave:

As requested by DEQ, Bullseye Glass Co. (Bullseye) is submitting an updated chromium usage allowance to incorporate the adjustments as shown in the revised Source Test Report dated June 22, 2017.

Pursuant to OAR 340-244-9040, Bullseye requests a chromium usage allowance of 540 lbs. of chromium per day and 21,308 lbs. of chromium per year. In support of this request, Bullseye is submitting an updated Technical Memorandum - Request for Maximum Chromium Usage Rate from Bridgewater Group (Exhibit A). Bullseye previously submitted its Air Dispersion Modeling Report for Baghouse West - Bullseye Glass - Portland, Or Facility, dated June 1, 2017 from Air Sciences. The air dispersion modeling files were separately sent to DEQ.

Bullseye is classified as a Tier 2 Colored Art Glass Manufacturer (CAGM) under Oregon's CAGM Facility Rules. OAR 340-244-9010(14). Over the last fifteen months, pursuant to restrictions in the CAGM Facility Rules at OAR 340-244-9040, Bullseye has eliminated its use of chromium in the manufacture of colored glass. To comply with this requirement, Bullseye has had to limit its hours of operation, which has, in turn, resulted in reduced company and employee earnings.

Bullseye has met the requirements under OAR 340-244-9040(3) for DEQ to approve its chromium usage allowance. Bullseye completed source testing under an approved source testing protocol. This testing measured chromium emission rates from Bullseye's baghouse that were extremely low, 0.00000412 pounds per hour.

Bullseye then sought and received approval by DEQ of its air modeling protocol. DEQ approved the protocol with limited additions on May 26, 2017. Bullseye completed air dispersion modeling according to the approved protocol and submitted the report to DEQ on June 1, 2017. Based on the measured chromium emission rates and the results of its air dispersion modeling, Bullseye calculated the maximum permissible 24-hour and annual chromium usage rates. See Exhibit A.

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The production of colored art glass with chromium containing raw materials has been and continues to be critical to Bullseye's business. The allowances that we are requesting are derived from the procedures and calculations as required in the regulations. Please note that our historic usage has been much lower on a daily and annual basis. Based on sales projections and production demands, we expect to use only a fraction of the allowances that are being requested. We appreciate DEQ's consideration of this request and supporting materials, and we respectfully ask that DEQ approve the chromium usage as soon as is practicable so that Bullseye's business can successfully continue.

If you have any questions, please contact me at (503) 232-8887.

Sincerely,

BULLSEYE GLASS COMPANY

A handwritten signature in cursive script that reads "Eric E. Durrin".

Eric E. Durrin
Controller