

Letterhead

Date

Joe Westersund
Cleaner Air Oregon Coordinator
Oregon Dept of Environmental Quality
700 NE Multnomah St, Suite 600
Portland, OR 97232
cleanerair@deq.state.or.us

Dear Mr. Westersund,

We are writing in opposition of the proposed rules for Cleaner Air Oregon. The proposed rules could create the most restrictive air toxics program in the country, which could drive many businesses out of the state and hurt our economy.

Rules should be based on actual emissions, not hypothetical emissions. Using monitored air emissions to regulate businesses would be a better alternative to imprecise air modeling. The proposed rules should encourage facilities to perform ambient monitoring that demonstrates actual risk at receptors.

Oregon businesses have a successful track record of reducing air contaminants, improving Oregon's environment, and protecting community and employee health. This is evidenced by the fact that, today, 80 percent of air pollution comes from everyday activities like driving and heating with wood stoves. Rules should be balanced to protect both human health and a healthy economy.

Thank you for the opportunity to provide feedback on the proposed rules.

Signature

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Dear Mr. Westersund,

We are writing in opposition of the proposed rules for Cleaner Air Oregon. The proposed rules could have a devastating impact on many Oregon businesses and communities by imposing air toxics thresholds many times more stringent than similar programs in other states. This has the potential to drive businesses out of the state and hurt our economy.

Oregon businesses should not be regulated on emissions they don't emit. In the proposed rules, businesses would be penalized based on their compliance with state land use laws. This puts businesses in the awkward position of suffering increased regulation because they are located near one another in industrial zones, which is required by Oregon's land use law. Businesses should not be penalized for following land use laws.

Due to substantial investments in pollution control technology, Oregon industrial sources now account for less than 15 percent of air pollutants. Rules should be balanced to protect both human health and a healthy economy.

Thank you for the opportunity to provide feedback on the proposed rules.

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Dear Mr. Westersund,

We are writing in opposition of the proposed rules for Cleaner Air Oregon. We are concerned that the stringent rules could hurt our economy by potentially driving businesses out of the state.

The program should assess risk at receptors where people are actually present for a selected period of time. Under the proposed rules, businesses would be regulated under highly unrealistic presumptions, such as one person remaining in one location for 365 days a year over 70 years. Rules should be based on likely health outcomes, not hypothetical standards.

Oregon businesses have a successful track record of reducing air contaminants, improving Oregon's environment, and protecting community and employee health. Due to substantial investments pollution control technology, Oregon industrial sources now account for less than 15 percent of air pollutants. Rules should be balanced to protect both human health and a healthy economy.

Thank you for the opportunity to provide feedback on the proposed rules.

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