

Good afternoon. My name is John Krallman. I am the staff attorney for Neighbors for Clean Air.

Thank you, Chair Bailey, Vice-chairs Boone and Johnson, and all the committee members for this opportunity to speak in support of House Bill 3492.

I want to give a brief overview of what this bill does and then open things up to any questions members of the committee have.

In essence, House Bill 3492 expands the current Oregon Toxic Reduction Program to specifically include consideration of how reductions in toxic use can reduce toxic air emissions. As an environmental consultant I worked on developing several similar plans at federal installations under the federal Pollution Prevention or P2 program. I have found that these plans *can* be helpful for sources in identifying a variety of input and process changes that easily reduce emissions and waste.

House Bill 3492 is important in expanding the current Oregon program to specifically focus certain sources on ways that reductions in air emissions may be accomplished. The sources are required to develop a plan that, among other things, evaluates technically and economically practicable ways that the facility can reduce or eliminate the generation of emissions of air toxics. The source is required to report back to DEQ on identified opportunities, any successes, and any barriers in implementing reduction opportunities. House Bill 3492 also provides a mechanism for DEQ to bring in technical support to help sources identify reduction possibilities or remove barriers for their implementation.

House Bill 3492 is not a sunshine bill: the report from sources to DEQ, even if it would otherwise qualify as a public record, is exempt from disclosure. However, this could help facilitate open

discussion of potential reduction possibilities, barriers, and costs. But importantly, House Bill 3492 begins to provide additional information to DEQ from sources on potential air toxic reduction possibilities. The lack of potential solutions is one of the major barriers to reducing air toxics from industrial sources in Oregon. Many of the other sources of air toxics have clear solutions, but because industrial sources are most often unique, solutions must be custom tailored. House Bill 3492 is not a silver bullet, but it is an important step in beginning to consider these custom tailored solutions and to get a handle on the serious problem of air toxics in Oregon.