

## Rich Locke

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**From:** Rich Locke  
**Sent:** Monday, March 20, 2017 11:35 AM  
**To:** hee.exhibit@oregonledgislature.gov  
**Cc:** Co-Motion Cycles Inc.; Cathy Childers (cathy@childersmeat.com); Skopils Cleaners; Gibson Steel  
**Subject:** HB 2669

Dear Committee directors,

My name is Richard Locke, I own a manufacturing business in Eugene. My business is considered a "Non-Reporting" manufacturing business in the Eugene "hazardous right to know" program. My business is one of 51 Non-Reporting companies that are assessed a fee based on our location, head count and sic code only, regardless of how much if any chemicals we use. but a city ordinance (20189) that was created to create funding for Eugene's failing program.

**Facts:**

The city of Eugene's Toxic right to Know program has been from the inception underfunded.  
The local manufacturing business has always opposed Amendment 54 of the Eugene charter.  
The Eugene toxic right to know is governed by HB 2431  
The city of Eugene is operating its HRTK program in violation of their own Charter.  
The Eugene HRTK program has assessed fees of over \$1,000,000 to non-reporting business's in Eugene since 2000  
There are more non-reporting companies (51) paying for this program than Reporting companies (approx. 30)  
The program was meant to be paid for by the Reporting companies. Per Eugene charter 54-7-A  
The City of Eugene passed ordinance 20189 to change the program from a weight based program to anyone who was in the SIC code (2000 – 4000)  
The City of Eugene changed the meaning of the " Hazardous Generator" ( which I find this very offensive)  
Non-Reporter although pay the bulk of the expenses for the Eugene Toxic Right to Know program cannot be represented on the board of directors.

**Facts for 2669**

Would change the max fee to \$10,000 from \$2000 based on employee count.  
Would reduce the total output of chemicals to 1000# from 2660#  
Would increase fines from \$250 per day to \$1,000 per day  
Would allow other cities to follow Eugene.

Because of my distasteful association with the Eugene Toxic Right to Know, having read every board meeting minutes from inception, knowing that all they ever do is discuss how to fund themselves and are serving no real purpose for the community.

The City of Eugene will not divulge the numbers of citizens that use the web site. I'm sure we would all be surprised how little people use the system.

The Director of the Eugene Right to Know has coached board members to bring up other ways to assess more business in the Eugene community. That would drag more companies into this program.

The Eugene board regards the non-reporting companies as "not to be trusted" and they get away with violation every day. This was expressed to me by a board member and her comment was "I personally don't know this to be true", I only know what I have been told by the city fire marshal assigned to this effort

.t is my opinion that this bill is being pushed by the city of Eugene for the purpose of supporting their failing program, and raise the fee assessment and penalties to any manufacturing company that fits the SIC code. It is my opinion that this bill will forever change the true definition of a "hazardous waste generator" and Mid Valley Metals has worked hard and are proud of our responsible environmental status in Eugene, but programs like this do not respect my business, thus dragging my business and 50 others to pay fee's that are not due to us.

This Bill should not pass!

Thank you for your service to Oregon, Please make the correct decision.

**Rich Locke**

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