

I am Ron Davis.

My families business in Hillsboro employs about 140 people. The company is involved in metal fabrication. We machine, paint, and assemble products for industries including Commercial and Military Aircraft, Military Weapons, Semiconductors and Electronics.

I care about fair air regulations because the company is required to have a permit to emit Hazardous Air Pollutants (HAP) and will be subject to expensive new regulations just like larger companies.

We measure our emissions in lb, not tons but are required to have a permit because of what we do. For example:

- We have the potential to use over 100 lb of stainless steel welding wire in a year.
- We have a paint booth and use some paint containing Hazardous Air Pollutants (HAP). This resulted in about 1 oz of chrome leaving our building last year.

Currently, we use engineering controls and have special equipment and filters in place to minimize emission of Hazardous Air Pollutants (HAP). Some of this equipment is required by law.

Emissions due to cutting and welding in our factory are regulated by OSHA. We perform periodic monitoring to ensure our employees are not exposed to dangerous levels of chemicals.

We report emissions of Hazardous Air Pollutants (HAP) to the DEQ every year as required by our permit.

Issues involving Hazardous Air Pollutants are complex and difficult to understand. This also makes the analysis, permit application and process monitoring expensive and challenging. Any regulatory changes will be expensive for us. Those currently proposed by OHA and DEQ will likely force us to eliminate processes and reduce staff levels.

I urge a NO vote on SB 1508.

- OHA and DEQ's proposed Cleaner Air Oregon program is the wrong approach.
 - **Oregon businesses should not be regulated on the basis of emissions they don't emit, and concentrations at receptors that don't exist.** To derive toxicity, DEQ's proposed program proposes to use hypothetical air emissions and hypothetical receptors that lead to highly exaggerated risk levels that mislead the public. **Using monitored air emissions to regulate businesses should be encouraged as an alternative to imprecise air modeling.**
 - **Oregon businesses should not be penalized for the actions of their neighbors or for following land use laws.** DEQ proposes to regulate businesses based on air emissions from their neighbors. This puts businesses in the awkward position of suffering increased regulation because they were located near one-another in industrial zones as required by Oregon's land use laws.
 - **DEQ's program should be based on likely health outcomes, not unrealistic hypothetical standards.** DEQ proposes to regulate business under highly unrealistic presumptions such as one person remaining in one location for 365 days a year over 70 years. Yet, DEQ fails to account for the very real health impacts of unemployment and poverty.

I urge a YES vote on SB 1541

- **Oregonians deserve both clean air and a healthy economy.** While SB 1541 would create new costs on business, it would set reasonable health protective benchmarks and provide regulatory certainty to many important regional employers, like our business.
- While the agencies involved (OHA and DEQ) would like you to believe that their proposed rules align with what other states have done, that's not an accurate portrayal. First, no other state has established rules so far reaching on existing facilities – facilities already subject to state and federal air regulations – who have spent significantly to comply with those specific regulations.
- Consider what others have done:
 - Southern California's air region has set a cancer risk threshold of 25 in a million and a non-cancer risk threshold of 3 in a million. This is a region plagued with air quality concerns.
 - Many other California air regions that are more like Oregon, including rural Oregon, have set a higher threshold of 100 in a million for cancer and 10 in a million for non-cancer.
 - The OHA and DEQ on the other hand has set its thresholds at 25 in a million for cancer and a Hazard Index of 1 for non-cancer.
 - Under the Obama Administration, EPA even determined that 100 in a million-excess cancer risk was protective of public health.
 - DEQ's rule is not a mainstream program and the legislature should step in and establish a program that fits Oregon businesses and communities.

Oregon employers and businesses deserve the certainty provided through SB 1541. It sets mainstream health protective standards that work for businesses and communities.

DEQ's proposed rule would not produce fair air regulations for Oregonians. The Legislature should pass SB 1541 and reject SB 1508.

Ron Davis
Hillsboro