

Testimony to the House Climate, Energy, and Environment.

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Founded in 1968, the Oregon Environmental Council (OEC) is a nonprofit, nonpartisan, membership-based organization. We advance innovative, collaborative and equitable solutions to Oregon's environmental challenges for today and future generations.

Dear Chair Marsh, Vice-Chairs Levy and Levy, and members of the Committee:

On behalf of the Oregon Environmental Council (OEC), we submit this testimony in support of HB 3229, to raise Title V program fees for 2023 and 2024.

While we understand that nobody likes fee increases, **HB 3229 raises fees for DEQ's Title V permitting program for the first time in over 10 years.** We support raising the fees in the most minimum amount necessary for Oregon DEQ to keep up with the cost-of-living increases and program costs. We also think it efficient to anticipate a future need and authorize EQC to adjust to the pace of inflation down the line as opposed to go through legislation every time.

The Title V permit requirements of the federal Clean Air Act (CAA) is critical in maintaining clean air regulatory schemes and to mitigate emissions from major industrial sources. We saw this firsthand just a couple of years ago, in our advocacy work around the Owens Brockway glass plant. In that instance, Oregon DEQ levied a \$1 million fine¹ after multiple violations of their Title V permit for opacity limits and particulate matter limits and settled on an additional supplemental environmental project to benefit the Cully neighborhood as a result of the enforcement action. This enforcement was also critical in getting Owens Brockway to commit to installing ceramic filters as a pollution control technology.² These enforcement actions and adequate staffing are even more critical in environmental justice communities where a disproportionate amount of industrial activity and pollution occur.

Thus, Oregon DEQ's ability to defend clean air and therefore public health is tied directly to its staffing and ability to carry out enforcement actions. Without some increased fees, DEQ will need layoff nearly 1/3 of the program's permit writers and inspectors statewide. This is bad for jobs, the agency, and our state's ability to protect public health and the environment and serve businesses.

Respectfully submitted,

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¹ <https://www.bizjournals.com/portland/news/2021/06/07/1m-fine.html>.

² <https://www.opb.org/article/2022/06/30/portland-glass-recycling-plant-owens-brockway-oregon-air-pollution-control-technology/>.