

## Technical Workgroup Meeting Notes

July 28, 2016

DEQ will be working with Oregon environmental justice (EJ) task force on full consideration of EJ issues. These issues will also go to the policy advisory committee for consideration.

### **TBACT and LAER discussion**

DEQ is looking for more in depth discussion on certain items:

- How is TBACT determined in other states?
- What is your data source for TBACT?
- Is it predetermined or case by case?
- What is the cost per ton threshold? How do you do the cost analysis?
- Do programs ever use LAER instead?

These are difficult questions, mostly policy discussions. When we apply TBACT will be a policy issue, but right now we just want details on how we could implement TBACT. DEQ does not know yet how TBACT fits in to the risk based permitting program.

- The most cost effective time to design/install pollution controls is ahead of construction. Sources should predetermine what controls are needed.
- BACT is usually an initial investment for a new source. RACT (Reasonably Available Control Technology) is a possibility for existing sources. Requiring controls can pose challenges, depending on how it is written. Implementation can be complicated.
- EPA comes out with the initial MACT set on 12% of the best-performing technology, which establishes the MACT floor. Every 8 years, EPA reviews MACT standards for technology updates as part of the residual risk evaluation. EPA allowed coke ovens to delay MACT if they would install LAER. You could use LAER as incentive – facilities could decide on a case by case basis.
- At South Coast, BACT is generally tied to criteria pollutants. It's a different process to define toxics BACT. Get South Coast's guidelines for criteria pollutant BACT. TBACT is somewhat looser than criteria pollutant BACT. It's trickier and also related to criteria BACT because they look at the same general pollutants such as particulate carrying metal or VOCs carrying toxics. Existing sources need to meet 25 in 1 million cancer risk. The existing rules have cost guidelines. 4 million per cancer incidence. Is removing cancer burden cost effectiveness It's awkward to base cost calculations on cancer burden; SCAQMD has never used it. They also have cost per ton guidelines that do not work because toxics are usually in pounds, not tons. No facility has tried to use this either. Facilities could get extensions in time if they determine that cost of controls is too expensive but nobody has ever used this provision. It's really hard to get a cancer burden

over 1 from facility emissions. You should expect that it will be hard to get cancer burden over 1 in Oregon.

- EPA also comes up with cancer incidence cost. It's very difficult to get over a threshold because they are working on cases in a million.
- TBACT could be different from BACT because you are trying to control more pollutants with TBACT. For example, lots of controls for metals do not capture mercury; you need specialized technology for that.
- Quantities of toxics emitted tend to be low. An analysis based on cost effectiveness ends up high on cost per ton. WA has had internal discussions on how to distinguish criteria pollutant BACT cost per ton from TBACT cost per ton. The level of toxicity should affect cost per ton goals. They haven't been able to develop a good approach yet.
- SWCAA BACT and TBACT are very similar for VOCs. One facility used a mercury control module that is different from standard BACT. Particulate bag houses are very effective to control lead. TBACT generally includes short term limits for toxics.
- South Coast has some opportunities for BART (Best Available Retrofit Technology). AB2588 requires looking at actual health risk in a community and requires it to be decreased with whatever technology is available at the time.
- Washington does not consider pollutant switching when requiring TBACT. However there is an opportunity to work this in as a flexibility provision.
- Part of the problem is that BACT has "technology" in it. Usually product switching is not part of technology review but it could be.
- Usually agencies look at what a facility proposes rather than what the process is. Alternatives analysis requires looking several steps back in a broader sense.
- South Coast uses a threshold approach and this avoids TBACT determinations.
- It might be helpful to include all industries in one room and brainstorm on what technologies they use. There should be some clearinghouses for sharing of information. Maybe there is something that DEQ can do to facilitate sharing of process innovations and pollution technologies.
- There are cases in which an industry wide approach is the best. You can make rules for a sector to reduce all emissions. Rather than individual risk assessments, do an industry wide risk assessment and risk reduction for small businesses so they do not have to bear the burden. South Coast is taking a facility wide approach on forging and grinding industries, like state MACT. You can do this for small businesses that are easily characterized and all do essentially the same thing. It could be based on risk with a surrogate like gallons of gas throughput in service stations.
- Has anyone done state MACT? NY may have done this. California definitely has.

### **Level of allowable risk – how to states determine and administer?**

- EPA's approach is twofold. If the risk is below 1 in 1 million, then it's considered safe and no further controls are required. If risk is above 1 and less than 100 in 1 million, they take into consideration other factors like cost per ton or pound and feasibility of controls but there is no bright line level. They look at maximum individual risk first then look at population risk, the number of people over a certain level. Environmental effects, cancer risks, noncancer effects and environmental justice considerations are part of the rule. EPA can lower the risk goal based on the presence of EJ concerns. Once over 100 in 1 million, then sources have to take action to bring the level down below that. You need to look at the risk assessment and see how much confidence you have in that. You can verify estimates with monitoring at times. You can also do subsequent risk assessments with less and less uncertainty. For EPA it becomes a policy decision. They only use one significant figure in risk calculations.
- When looking at multipathway risk assessment, it is easy to cross 1 in a million line. You also need to look at persistence and other factors.
- How EPA lays out toxic rule preambles is workable system. They set risk targets and then look at how much of the population is exposed. Washington looks at a number of residences impacted above one in a million, although this is not written into the regulations.
- NIOSH uses 1 in 1000 to 1 in 10,000 which is much higher for workers compensation.
- South Coast requires risk reduction even if there is a single person above an acceptable risk level. They look at population risk. They also bring in cumulative considerations based on number of other sources impacting people. Sources must meet both the cancer risk and cancer burden thresholds.

### **How to implement changes in SERs, RBCs and chemical list.**

- The federal program is cast in stone and very difficult to make changes to the chemical list. EPA stressed that a dynamic list is better. If a new pollutant pops up, DEQ should be able to add it quickly. EPA updates materials on an annual basis, not in regulations. It's a good question on how you change rules and permits in response. EPA has an opportunity to catch up in a residual risk review or technology review that's done every 8 years. Chloroprene toxicity is an example.
- Oregon could potentially use ATSAC as continual review process.
- Washington was supposed to review chemicals every 3 years but in 25 years, it has only happened twice. It's good to make changes to the chemical list by rule because that gives the opportunity for public process which is important. It is very resource intensive to update the toxic air contaminant list and it usually falls to a lower tier of priorities.
- You need to build some kind of timeframe into the regulations for chemical review.
- People like the fluidity of the Proposition 65 list in California. They can add new information when it comes out. If a chemical is listed as a carcinogen by another authoritative body, they go through a notification saying that they are adding a compound

and people can comment. OEHHA is very aware of science and build it in to their process.

- For some things it could make sense to have formal rulemaking for a major change like adding diesel particulate matter as a carcinogen. If it's a minor tweak (i.e., 3% difference for compound X, will not affect very many people), you could potentially do it with less process. You should build in flexibility for different types of changes.
- Despite required update cycles, you still need to be checking IRIS and other databases to understand if there have been any significant changes.
- NIOSH reviews chemicals every 5 years.
- EPA gives other agencies a list of significant pollutants to review every year for development of research.
- There is no formal process for states to share information about air toxics. NACAA can sometimes fill this role, pollutant by pollutant, such as the N-propyl bromide petition for addition to EPA list.
- Washington's information on list updates is archived and available to all.
- Washington has two staff that do risk assessment/toxics work. It is a very large burden on small staffs. States have trouble keeping up. States should ask EPA to provide more assistance with this.

### **Fugitive emissions – how are they addressed, pros and cons?**

- The best way to control fugitives is through “good housekeeping,” such as dust mitigation measures. EPA addresses fugitives with leak detection and repair for chemical refineries and dry cleaners.
- Fugitive could mean many different types of emissions. Those emissions from open buildings and roof vents usually require facilities to address them with good housekeeping and other common sense approaches like capture efficiencies on hoods.
- South Coast says good housekeeping is critical in many industries to control fugitives. You need to spend a lot of resources on inspections to enforce housekeeping and fugitive controls. It's hard when there are inherently dirty operations. Businesses get behind so good housekeeping gets bumped off because of interruptions and other priorities. It's easier to rely on control technologies because they are either working or they are not.
- For problem fugitives a fence line monitor is sometimes the only way to enforce compliance. You need a good monitor in the right location. South Coast generally relies on monitoring data to monitor fugitive compliance. Quantifying can be a real challenge for emissions from doors, vents, or cross drafts without monitoring data.
- Washington tries to quantify fugitives as much as possible. One way to try to estimate fugitive emissions (after quantifying to the best extent possible) is to have sources tell the agency what they are bringing into the facility and what they are putting out as waste,

more of a material balance attempt to estimate fugitive emissions. If appropriate controls exist, they need to use them.

- SWCAA does same thing and has a rule requiring reasonable precautions to prevent problems. The only difference between fugitive and stack emissions is that it has not been captured. You can use technical assistance to help facilities do this. Make an engineering judgment as to what quantities are emitted.
- Some MACT standards have housekeeping practices built in. When venting inside a building, it becomes a workplace issue so you can coordinate with OSHA who has visited facilities. If you don't release into the air, you might create an even more harmful exposure to the workers that are working there constantly.

## **Risk Communication**

- How to communicate what the rules are based on is a challenge. When assessing the risk of a carcinogen, assume any single molecule has a potential to start a process in the body that causes an increase in risk to get cancer. This is based on animals studies exposed to extremely high doses and extrapolated to humans. The extrapolation is very uncertain and may or may not be linear. Draw a line where there is almost zero risk. Using 1 in 1 million is relatively insignificant amount of risk but is a challenging concept to explain and needs to be done every time the public is concerned about health. Risk communication can be done in several ways. There is no right way to do it; no one right approach. People want to get information differently. Explain that the rule is intending to prevent a significant increase in risk to human health and ensures that new facilities are built in a way to consider the health of people around it by not causing a huge increase in theoretical risk by itself. This is a process that is touched on in rule. Each process requires public notification allowing public to express concerns and ask questions. Most projects go through the public process with no comments and others where the community doesn't want industry in area get a lot of comments so risk communication becomes extremely important. Do more than a factsheet. It requires someone to go out and talk to people and try to put in perspective what these risks actually mean. Theoretical numbers are abstract for people. They hear the word cancer and ask are my kids are going to get sick? It's scary for them. Just laying out the basis of the rule that the increase in risk is pretty small and perhaps low helps some people but not all. Just be honest with people. Do not try to ease concerns but communicate what the risk is. If they are still concerned, they can be outraged. That's challenge of communicating risk.
- Some kinds of risk communication are daunting. If you have hundreds of people coming to meetings and weighing in, there can be a lot of trepidation. It is important to be precise. Sometimes multiple meetings are important. Follow-up after a meeting is important to continue the dialogue with phone calls or sending reports. Lay the groundwork ahead of time with information such as web materials. What is the message you want to deliver on a facility or issue? The whole process is involved. Make sure there is plenty of opportunity for public feedback and know what you want do with that feedback. Contact with the media needs to be carefully thought out too. A lot of emphasis

is placed on technical effort but a lot of resources are needed on risk communication, taking more resources than expected.

- If there is a point where this whole program can go wrong, it's in risk communication. You can have the perfect technology and science based program but if you fail on risk communication, you fail totally. Emotions come into play. Most people conceive risk in two numbers, one and zero. Is it safe or not safe? Does it cause cancer or not? Risk is a difficult topic to communicate to public, even a very well educated public. It's difficult to perceive what the numbers mean. Breathing is not voluntary, not like flying or smoking. Try to involve and educate the public every step of the way. Webinars are excellent at trying to bring deep scientific knowledge into lay terms. Let the public have feedback. If something is not clear, let them address it. The more you educate public, the more the chances of risk communication are successful.
- Involuntary risks are viewed as being riskier than what we do every day, which actually can be riskier. Risk communication is viewed as afterthought of risk assessment. We should be thinking about it up front and address it early on. Community meetings are at the bottom of the list for effective communication. You need to build up the credibility of an agency or facility in small groups over a long period of time. Credibility can be lost in just one event. Risk communication is a long term process and talking about involuntary risks that people are concerned about is important.
- The context that you put risk communication into is important. When dealing with a large range of people, the idea that something is "safe" is in the eye of the beholder. Look at how people drive. What one person thinks is safe is not what another person thinks is safe. You have to look at the context. Be straightforward. Don't hide data. You can say you don't have data yet but be clear with what you know and don't know. That context helps as people look at risk assessment. There are lots of variations on how it is done and two different experts can come to different conclusions. Be clear and honest. You also need to be able to say what the next steps in addressing risk are.
- You have to be empathetic when you answer tough questions. There are concerns about health and household. Don't go straight to technical answers but show concern first. Emphasize that at all group meetings with stakeholders. It helps build credibility. More one on one meetings build trust over time as people get to know you better.
- Sometimes the format of communication is not one size fits all. In small groups, you can have more candid conversations. The back and forth dialogue helps build trust and understanding of each other's viewpoints. A larger format can be better at times. Larger formats can also build trust. In some cases, multiple stations at a community meeting work well. An open format where you can walk to each station can work for simple informational meeting where there isn't much controversy. This format can backfire if there is controversy. In these situations, people want to speak their mind where everyone can hear it. There are times when a town hall meeting with presentations then public testimony is a good format and can build trust with community. Everyone can hear the same message with contrasting viewpoints. Larger scale meetings are better for controversial issues. You can take testimony and get back to people or you can take questions and provide immediate response.

- You could do listening sessions with posters around the room. Be sure and build time with experts to build trust and credibility. You could use a hybrid approach with a community meeting so people can express concerns and others can hear those concerns for a common message and common understanding then break into small sessions with posters to ask detailed questions. You need to understand the original outrage and help people express it then get to technical issues.
- Members of the public are well educated. Be transparent on existing knowledge. The public can find different risk values from different regulatory agencies for the same chemicals. The public would like to hear that you will do the best science and in the best way possible to protect the public. Any agency can put forth risk values for a chemical and get so many comments. One risk value is usually not agreed upon by all scientific community members The ITER (International Toxicity Estimates for Risk <https://toxnet.nlm.nih.gov/newtoxnet/iter.htm>) website is composed of human health risk values and cancer classifications from multiple organizations worldwide. Therefore explain the framework and the best possible outcome for the public after deriving the risk values. The public expects 1 and zero as an answer for a risk, which is not possible. When you find out a chemical you are going to work on, immediately take action on Tier 3 or Tier 4 values, hazard screening approaches. Then the public is aware that that chemical is on hold and the agency is working on it, rather than waiting few to several years to derive risk values. Always have a chemical on hold for Tier 3 and 4, and after you complete the comprehensive risk assessment, then the lower tier values could be replaced with the higher tier comprehensive risk values. This is a more efficient process.
  - Tier 1 – Comprehensive risk assessment process of deriving quantitative health based risk values or adopting such values from other agencies (need more extensive data)
  - Tier 2 – Deriving/adopting provisional values (e.g., Provisional Peer Reviewed Toxicity Values (PPRTV) values from US EPA (<https://hhpprtv.ornl.gov/>) (Need moderate data)
  - Tier 3 – Read across approach (Surrogate/QSAR) (Need moderate data)
  - Tier 4 – Hazard banding (Least data requirements)
- When you do risk communication, bring in more than scientists. At EPA, there is a whole communications group to help with public hearings, not just nerdy scientists who will be too technical.
- Bring in communications folks early. Bring in other employees in enforcement and permitting. It's one thing to say here are the risks but you need a white board that says what we are going to do about it. Go through the risk analysis but at the end of the day, people want to know what are you going to do about it? Often there is a lot that many entities are doing to address risk: enforcement, court cases, rulemaking, emissions reductions, etc. It's not just about risk communication or risk but what is being done about it. It's helpful to have other voices at forums.
- The timing is critical to build trust. If you wait too long to positively know the final answer, it might be too late. For Bullseye, in the time it took to study the problem and try to get answers, you could have lost trust in community. They perceive it as hiding information. You're trying to do a good job to study the information before going public.

Months pass and you can't move at a quick pace. At a minimum, go out and say we have a potential problem; we don't have the answers; we need to study it further; we will give you update along the way. Be up front to start early communication. Timing is critical to build trust.

- NIOSH was working on one chemical for the last few months. They weren't sure if it was carcinogenic or not. They informed producer that there were going to call it a general toxicant unless proved otherwise. Within 5-6 months, the producer went out and collected studies. Once you have taken a step, the other party will move quickly and try to find solution.
- Timing is crucial. Statutory timelines must be followed. Sometimes you have to build in your own timelines in local regulations, depending on what you are doing. To complete a health risk assessment on a facility in Southern California, public notification rules require that the facility has 30 days to mail out letters to the affected area. Then 2-4 weeks after, they must hold a public meeting. You need at least 2 weeks' notice to hold public meeting. With the information age, information is available instantly. Make information available ahead of the meeting on the internet so people can review and prepare. People are busy so online information is good. South Coast is struggling with the social media aspect. How to really effectively engage in that. They are still working on that. It goes into timing because information is instantaneous but government doesn't move like that.
- Cal EPA has a good public outreach communications program. Start out with guidelines. Write a fact sheet early on and use certain steps to prepare for community meetings. Define the key messages. Use a good model. Consider where you have community meetings. They need to be in a place where the community feels comfortable. Schools?
- EPA's EJSCREEN is useful. It incorporates census data, numbers and ethnicity, but also talks about linguistic isolation. In a community that is linguistically isolated, what is the language that people can understand the message? Translate agency materials in multiple languages and have the translator attend meetings that involve public. Use translation services, especially in farming communities.
- At South Coast, everything is in two languages, Spanish for written communication. They typically translate only the summary of a technical report. For general communication, they will have translators at meetings. EJSCREEN is the best interface for mapping. Use EJSCREEN for geographic areas and look at populations. If a census block group shows different language, translate into those languages. They use a loose 10% threshold for census block for determining when to translate to a second languages. It's nice to have threshold set but one you can adjust. People complain why aren't you translating? It's difficult to translate into too many languages. It's good to have a practice for translation but you need to maintain flexibility.
- EPA just released new version of EJSCREEN that can do more than give risks. It looks at linguistics, education of the community and census data. Like WA and CA, EPA's website is translated into Spanish except for the technical portions. They should tackle translation of technical information but it's a resource issue.

- You have to use very precise language as the key for risk communication. Some caution needs to be taken because it can go south very quickly. Translating technical language is difficult. Not all translators can do that. How exactly should this phrase be translated? You need bilingual folks that can speak technical language to and to think about technical issues. If the phrasing isn't exactly right, it's difficult.
- NIOSH usually has contracted translators. There are limited resources because it takes a lot of time to thoroughly translate, not just a laymen translation. Scientific translators are needed. NIOSH doesn't do much translation, about once in 6 months.

### **How do you involve facilities in risk communication?**

- At South Coast, there are different requirements for new and existing sources. For existing sources, if there is a notification required because they are above a threshold, the facility is required to do all notification. South Coast will write the main letter to communicate risk then the facility can add a cover letter and do all the mailings. The rules require the facility to conduct the meeting which has been troublesome. Over last few years, South Coast has conducted the meetings. The facility is at table and invited to present and help answer questions. It's been more effective if South Coast runs meetings. Some facilities don't want to get involved but it's important they do so. For new facilities with multiple processes to permit, communication (mailings, public meetings) for permitting depends on the type of permit. For larger facilities, employees might attend and provide testimony. This gives a different impression but also gives space to provide all input. CEQA has large environmental documents done by facilities' consultant but South Coast shares them with the public. There is shared responsibility so there is a lot of communication between the agency and the facility. Make sure the facility knows ahead of time so there are no surprises. Defenses build up if they are accused of something. Share up front what will be communicated. Spend time communicating with local elected officials or other agencies. If you are worried about a facility in town, talk to the mayor, city council, local planning staff, and let them know ahead of time that this is coming. Surprises are not looked on favorably.
- Invite the facility to the table at public meetings. Provide as much advance notice as possible. Allow sharing so they can give their side of the story. In a small town, it is often just one industry and the public is worried about jobs.
- It is essential that the facility is involved in community meetings. Invite the facility and have the agency hold the meeting. It helps the facility think through what they can do better and also helps the community understand what is important to facility. Do dry runs for both agency and facility so you know what each other is saying and there isn't a conflict. Employees are good, credible sources of information, but understand and know what they will say.
- Public notification can be improved and is not a consistent process. Sometimes just the bare minimum is done; notice in the paper of record in the legal notices, which no one reads. Go beyond what is minimally required by statute. Many people that work in these facilities have contacts in communities and can help get the community get involved. If no one shows up, at least they know they have tried what is beyond minimum

requirements. This is an area for improvement in Washington. Sometimes they do a good job and other times it's just the minimum. Sometimes the first interaction of the facility and the public should have been done earlier. You can only encourage communication between public and facility.

- Communication goes two ways. We have been talking about the speaking part but you also need the listening part. The listening part is where you get the most bang for the buck. How you listen, the space to listen, and being empathetic are important. What are you following up on? Provide information to public and give them a chance to weigh in. Build listening in process to build trust. Listening is just as important as speaking.

### **Best practices for dealing with misinformation, especially with media?**

- Have a media manager that is the liaison with the formal media. It can be a full time job for all interview requests. You need time to craft much shorter messages than 2 hour meetings. Sometimes you can be proactive and other times you have to be reactive. The strategy depends on the situation.
- Misinformation – don't let it happen. All communications should go through the communications staff. Talk online with the communication staff before talking with the media.

### **Public Comment**

Akash Singh – The conversation around the principle of toxicology has shifted in the past years. Thanks to Ian for mentioning the technical aspect of EJ and to Marjorie for saying everyone is considered a population even though impact is variable. Technical work can be converted to policy. Agencies are beholden to public. Concerned about community engagement. Public's disenfranchisement. Distress when comments not greeted with respect and understanding. Getting the public to engage with the facility is not always possible. The agency can act as a go between. Parents are concerned with the health of children going to school near industry.

Chris Winter – asked to focus on EJ at last meeting. Ian's comments yesterday on the technical aspects to address EJ were good. It's a mistake to assume EJ is just a policy issue. There is broad and emerging science on disparate impacts. Work with Governor's EJ task force. Oregon doesn't have any state level NEPA law. Consider effects of its actions on EJ. Haven't seen DEQ address EJ in permitting. Three points:

1. Emerging body of science on social stressors interacting with toxics to exacerbate risk. Have OHA prepare a literature review for social stressors of toxics chemicals for DEQ and EJ task force. It would help if risk based is actually protective.
2. Screening tools can be used. DEQ learn from other examples to identify EJ communities to see if they are struggling with health disparities.

3. DEQ's obligations under Title VI of the Civil Rights Acts say that DEQ's actions cannot result in disparate impacts on EJ communities. Take demographic data and overlay on environmental data. Schedule policy forums far enough in advance

Andy Mecklin – community based monitoring programs, risk communication and EJ, EPA's office of enforcement. Citizen sampling is an exciting and important development and is inexpensive. Tedlar bags can be used with simple syringes to gather the sample. Give Tedlar bags to community members. Talk about data before you get the data. EJ – give bags to minorities. EPA monitored carbon disulfide at a facility based on Andy's recommendation.

Julie Proust – Oregon feels they need to develop Cadillac program which can feel overwhelming and daunting. She has no confidence in DEQ to implement rules. The culture for decades is mired in underfunding and excuse making. DEQ is beholden to industry for fees and the program so we don't want to be mean to them. Pervasive culture.

Dayna Jones – Thank you for addressing cumulative impacts. Keep OPAL involved in next steps of EJ process. OPAL has technical and on the ground knowledge. They can tell us how to best reach people. Be creative and imaginative on how to engage and educate public. Keep involved in all stages of process, not just after decisions are made.

Greg Thielen – Why can't we do more stack testing? Too expensive. What about a drone with a Teflon bag you can fill and take to DEQ to analyze. Development of a multi-copter with whole air sampling apparatus that can measure .004 ppb by volume. Would this be useful?

Dale Feik – Sent an email and made copies for TWG. Summary of books presented yesterday along with summary of 21 youth filing suit against federal government. Intel GHGs 118,000 tpy. Toxics are important but so are GHGs. Consider GHGs.

### **Review of Issue Papers – has DEQ captured content of committee input?**

- Issue papers will be used to inform the policy advisory groups. Input was taken and the papers were revised.

### **Last Advice**

- Ian - Just do it.
- Ted - DEQ has amazing opportunity to design this program at this time. Good staff, good state program. Take advantage of new technology. Lots of public has sat through the whole 32 hours
- John - appreciates being part of group. Don't envy task of building program but thinks Oregon will have good program.
- Gary - Helpful for Gary as much as for OR in the event that Washington would ever reopen their rules. Will continue to help.

- Marjorie appreciates being part of the discussion, will continue to help.
- Don - It's been a great process with a lot of information so don't get overwhelmed. Be methodical and try to get through it.

Leah - thanks all on the behalf of directors of OHA and DEQ. It helped to have the technical group before proceeding to design program.

Morgan - thanks to public again. They are an important part of the process and wants to keep hearing from them. Check website for forums. EQC will get briefings. DEQ will also conduct a literature review and work with state EJ task force on the Cleaner Air Oregon website to show updates.