

DEQ/OHA - Cleaner Air Oregon Rules Advisory Committee Meeting

Air Toxics Programs Alignment and Updates Rulemaking Meeting 2, Session 2: February 5, 2021

Facilitator's Summary of the Work Session

Purpose of Meeting

On February 5, 2021, DEQ/OHA convened meeting 2, session 2 of the Cleaner Air Oregon (CAO) Rules Advisory Committee via Zoom Webinar/Conference. The purpose of the meeting was to:

- Align the process for setting and revising toxicity values for toxic air contaminants; and
- Update and integrate the Oregon State Air Toxics Program and the recently established Cleaner Air Oregon Program (CAO).

Meeting Attendees

The meeting attendees included members of the CAO Rules Advisory Committee (RAC) (see Attachment 1 for RAC members in attendance), staff members from Oregon Department of Environmental Quality (DEQ), Oregon Health Authority (OHA), members of the public, and the facilitation team.

Welcome, Opening Remarks and Introductions

Hannah Wilkinson, ODEQ and Donna Silverberg, facilitator from DS Consulting, welcomed everyone to the meeting. Donna reviewed the agenda and speakers for the meeting and suggested discussion protocols to support the group's sharing and hearing of diverse viewpoints. RAC committee members introduced themselves.

Gabriela Goldfarb, OHA Environmental Public Health Section Manager, welcomed the group and thanked RAC members for their participation. She noted that the rulemaking proposals presented at this session will support OHA's effort to stay updated with the science moving forward.

Ali Mirzakhilili, DEQ Air Quality Administrator, also welcomed RAC members and expressed appreciation for RAC members' time and efforts.

Hannah Wilkinson, CAO Program Coordinator, walked the group through the materials provided to RAC members in advance of the session. Those materials, which included a rulemaking guide and slides from today's presentation, can be found on the [CAO website](#).

Hannah reviewed the following proposals that DEQ and OHA would present for RAC consideration:

- Create a stand-alone rule division (247) to house the list of toxic air contaminants, list of toxicity reference values, and the process for updating those lists.
- TRVs become the basis of Ambient Benchmark Concentrations (ABCs)
- Remove redundancies between Cleaner Air Oregon and the Air Toxics Program (Safety Net Program).
- Refine the authoritative source list by removing sources that will be outdated and will not reflect the best available science.
- Make clarifications in the petition process rule language.
- Efficiently develop new toxicity reference values (TRVs) as appropriate during the TRV review process.
- Repurpose and re-scope the Air Toxics Science Advisory Committee (ATSAC) to allow for technical consultation during the TRV review process.

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Hannah noted that DEQ had added an additional proposal since the November sessions: to create a stand-alone rule division (247).

Introduction to Division 247

Keith Johnson, DEQ's CAO Program Manager, introduced the proposal for creating Division 247. He noted that a significant priority for DEQ is to harmonize the two programs dealing with air toxics. The overall goal is to have a single list of air toxic standards and establish a clear pathway for defining and updating the toxicity reference values.

As staff evaluated how to accomplish this rulemaking goal, they determined that an organizing concept would be helpful for future reference of these standards. Both existing Divisions 245 and 246 have important concepts related to managing and maintaining the air toxic standards. DEQ is proposing to create a new division in which those values reside and to include some of the provisions related to those values in that new division.

The new Division 247 would be a reference division that lists the standards that apply to both Divisions 245 and 246. The Risk-Based Concentrations (RBC's) would remain in Division 245 where they are used. The Ambient Benchmark Concentrations (ABCs) values will be removed from Division 246 and captured as TRVs in Division 247; however, the ABC definition and concept will remain in Division 246 as it is an important part of the geographic and source category rules. The new Division 247 will also be a helpful organizing tool for the future.

Proposed Changes to DEQ's Air Toxics Programs/Process for Updating Toxicity Values for Toxic Air Contaminants and Facilitated Discussion

Meenakshi Rao, Ph.D., the lead air toxics planner and analyst at DEQ, and Holly Dixon, Ph.D., OHA public health toxicologist, then presented the proposed updates to the RAC members and engaged with them in a facilitated discussion of those proposals.

Proposed Updates to Division 246

Dr. Rao provided an overview of the proposed updates to Division 246. She noted proposed language changes so that there is consistency across all three divisions: changing references to "Air Toxic" to "Toxic Air Contaminants" and ensuring the Divisions consistently refer to ABCs as "*ambient benchmark concentrations*." Additionally, she noted that Division 246 would retain the purpose of Ambient Benchmark Concentrations (ABCs). TRVs are proposed as being equivalent to ABCs with the definition of ABCs updated to align with the definition of TRVs. The sections relating to establishing ABCs and the list of ABCs can be removed from Division 246 as this process will be captured in updates to TRVs in Division 247. The ATSAC provisions will be updated and moved to Division 247. Finally, the Safety Net Program would be removed as it is considered redundant in light of the CAO program. Dr. Rao then reviewed the proposed updates in more detail.

1. Proposal: Remove the Safety Net Program

Dr. Rao provided background information on the Safety Net Program. She noted it was designed to be used in very rare circumstances to address high emissions of toxic contaminants from unregulated sources. DEQ has never invoked the Safety Net Program. Instead, DEQ has created the CAO program, which is a statewide "safety net" for stationary sources. In addition, CAO has a mechanism to assess and potentially reduce emissions from unpermitted sources.

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CAO has clearly established assessment, risk reduction rules and permitting procedures that are parallel to the Safety Net Program. DEQ believes that CAO offers a more efficient pathway to address risk from unregulated point sources. While proposing to remove this program, DEQ is not giving up any authority to establish a similar program in the future.

She acknowledged RAC members' feedback and concern that the removal of the Safety Net Program might allow for situations where emissions from an unregulated source pose an undue risk that cannot be addressed under CAO. However, DEQ has reviewed and confirmed that CAO does cover all scenarios covered by the Safety Net Program. DEQ is committed to reviewing the Oregon State Toxic Air Contaminant Program in the future and will explore the potential for a safety net type program for non-stationary sources at that time.

Dr. Rao then addressed questions/comments from RAC members:

A RAC member asked, would the Safety Net Program move faster than CAO's evaluation process?

- Dr. Rao noted that it would not move faster, because the process for the Safety Net Program would still require modeling and monitoring to demonstrate that there were benchmark exceedances 'solely attributable' to the point source.

While some RAC members supported the removal of the Safety Net Program, others expressed the view that the Safety Net Program is a tool that serves a valuable function to address and regulate source gaps that are not presently anticipated. There was a concern that CAO does not identify a pathway for unique-risk or worst-case scenario risk, the CAO process is too slow, and so it would not allow DEQ to take action on an urgent basis. The name itself provides communities a comfort that DEQ could do something, even for unregulated sources.

Some RAC members felt that the concept of a safety net and safety-net like tools should be retained in the rules so that DEQ can act quickly if an emergency, such as a toxic hotspot, arises. It was noted that CAO can re-prioritize as needed to bring urgent concerns to the front. Michael Orman, DEQ Air Quality Section Manager, noted that the Environmental Quality Commission (EQC) still retains the authority to build a program like the Safety Net Program in the future and DEQ will revisit the concept when revising Division 246. A RAC member suggested that more clarity around immediate curtailment would help to reduce concerns regarding the loss of the Safety Net Program.

Another RAC member sought to understand how would DEQ address cumulative impacts? Would the Area Risk Pilot Program be helpful to identify unforeseen events?

- Michael noted that DEQ would be revisiting Division 246 with a view toward designing a more comprehensive way of addressing air toxics beyond point sources after this rulemaking process. Keith noted that the Area Risk Pilot Program has the potential to look at cumulative risk; he expects this work to start this quarter. However, the program is limited in geography to Washington and Multnomah Counties.

2. Proposal: Align ABCs and TRVs: Define ABCs in terms of TRVs

Dr. Rao then reviewed the proposal to update the ABC definition to align with the TRV values. The revised definition will include the phrase that an ABC "*is numerically equivalent to the Toxicity Reference Value*" as defined under Division 247. She noted that the purpose of the ABCs will be retained as policy goals in Division 246. In removing the ABC values in rule, none of the 55 ABCs will not be lost as they are already included in the table in Division 245 that is proposed to move to Division 247.

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3. Proposal: Align ABC and TRV Review Process: Move ATSAC review role and operations to Division 247.

Dr. Rao noted that under current Division 246 rules, the Air Toxic Science Advisory Committee (ATSAC) serves 5 functions:

- Review ambient benchmark concentrations for the state air toxics program;
- Advise DEQ on developing risk assessment methodology in the Safety Net Program;
- Advise DEQ on selecting sources for the Safety Net Program;
- Evaluate overall progress in reducing emissions/exposures to air toxics; and
- Advise on questions requiring scientific expertise as requested.

In DEQ's proposal, ATSAC's role of reviewing ABCs would be moved to Division 247 and re-scoped for the purpose of reviewing TRVs. Other functions listed above would be removed. She noted that the EQC would serve the oversight function, as DEQ will be providing regular updates on the toxic air contaminant program to the EQC. Further, DEQ always has the authority to consult with ATSAC. Dr. Rao noted that ATSAC operation descriptions (relating to membership, appointment, term and operation) would be moved to Division 247 and adapted as needed to become the TRV review process.

A RAC member sought to understand the impact of these changes and noted that there can be value for a government agency having a standing committee with extra-mural expertise that works together on a regular basis. Keith noted that the ATSAC is a committee that was formed to review, evaluate, and recommend values for ABCs to DEQ. The intent now is to re-scope the ATSAC function to focus on reviewing the toxicology standards while paring back the consultative functions, most of which were associated with the Safety Net Program.

4: Proposed ATSAC Scope: Review and provide feedback on updated TRVs proposed by DEQ in the TRV review

Holly Dixon, Ph.D., OHA public health toxicologist, reviewed the proposed changes to ATSAC's scope. DEQ's intention is to focus ATSAC and reduce the time they spend on requests from DEQ. She reviewed the TRV rulemaking process and noted that the general rulemaking process will not change. She also reviewed DEQ's proposals relating to the skillsets and expertise needed, proposed ATSAC Membership Terms, ATSAC Deliberations, and the Petition Process for the TRV Review.

A. The TRV Review Process with ATSAC

Dr. Dixon noted that DEQ will first develop proposals for TRV updates that are informed by a review of updates to authoritative sources and petitions. As the intent is to be as efficient and effective as possible, DEQ's and OHA's toxicology team would propose the questions to ATSAC.

Next, DEQ is proposing to add two new steps: 1) DEQ & OHA will consult with ATSAC on TRV updates; and 2) DEQ & OHA will consider ATSAC's feedback and summarize the ATSAC's recommendations. After doing so, the general rulemaking process will continue: the RAC and Fiscal Advisory committee will consider DEQ's proposals, there will be a public comment period and then DEQ will present those proposals to the EQC for adoption.

Dr. Dixon engaged in discussions and addressed questions/comments from RAC members: Some RAC members noted that it is important to have an independent expert body provide analysis with a fresh perspective and avoid the potential for pre-determined conclusions. There was a concern that the proposal appears to narrow ATSAC's role which might narrow the scientific authorities that DEQ is relying on and limit the amount of input to DEQ. A RAC

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member also noted that the purity of the health-based standards was important to the goals of CAO and needs to be strongly founded in pure science and risk.

Keith noted that DEQ's intent is to have a strong committee that is grounded in science. He noted that ATSAC will be an independent, scientific advisory body for DEQ and OHA to consult with during the triennial review. DEQ staff noted that the previous rules also provided that DEQ would come up with the proposals and bring them to the ATSAC. It was noted that DEQ and OHA have more toxicology resources and expertise to do the first review on TRVs. Previously, ATSAC reviewed approximately 55 chemicals over a 4-year period. In the future, ATSAC will be looking at hundreds more chemicals. Finally, both the old and new ATSAC (and DEQ/OHA) will be relying on the same authoritative bodies.

B. Skillsets and Expertise Needed

Dr. Dixon noted that DEQ received comments that there should be more emphasis on toxicology expertise and it was important to have someone with expertise on how chemicals move and transform in the environment. As a result, DEQ revised its proposal slightly and now is seeking feedback from RAC members on the revised proposal:

Specifically, DEQ is proposing that ATSAC members need to understand the toxicity assessment (a proposed update to the 'risk assessment' discipline presented during the last meeting). A toxicity assessment determines how much of a chemical causes harm to health. This involves being able to interpret research studies that look at health effects on humans and other animals in response to chemical exposure. Toxicologists and epidemiologists have the critical skillsets to evaluate these studies. Biostatistics, in addition, could be useful to help evaluate if the number of humans in a study was adequate to evaluate the impact of the chemical on health. She noted that toxicity assessments are how scientists set TRVs and therefore, expertise in toxicity assessment is crucial for this re-scoped committee. ATSAC members need to be able to think critically about TRVs.

In summary, DEQ is proposing to have toxicity assessment, toxicology, epidemiology and biostatistics as the minimum expertise listed for possible ATSAC membership in the proposed rules. Additionally, DEQ thinks it is complementary to have committee members that understand how chemicals move and transform in the environment and at a minimum, it is important to have a member with expertise in environmental and/or atmospheric chemistry. These are minimum standards and DEQ would not be excluding people with additional expertise. DEQ will be looking to diversify the committee with members that have additional skillsets, for example, people who have cross-training in public health. Dr. Dixon asked RAC members for feedback on the following question: ***"Will this proposed list of expertise for the ATSAC members allow the ATSAC to review and provide feedback on updated TRVs?"***

Dr. Dixon addressed questions/comments from RAC members on the expertise needed for the ATSAC:

- It was noted that environmental health is an integrative specialty that traverses many different things.
- People with medical training are important to include in the conversation as they have the understanding of effects on the human body. Many physicians have training in epidemiology.
- A RAC member suggested that expertise regarding air pollution and meteorology is also important to understand the settling patterns, layering, and inversions that may occur. While one RAC member felt there was no need for experience in air pollution modeling as that was related to exposure, another RAC member suggested that the expertise in

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environmental and/or atmospheric chemistry could include experience in air quality modeling.

- Other expertise RAC members considered to be important included: an understanding of bio-accumulation; specific expertise with inhalation exposure; public health; a specific focus in neonatal and early child development; and an environmental justice lens.
- Some RAC members noted that the committee needs to include a member who is not employed by a state agency and it is important that no members are employees of DEQ or OHA. It also was suggested that people with experience working with industry and manufacturing should not necessarily be excluded from membership.

Keith noted that the role of ATSAC is important to carry forward and DEQ is proposing to narrow the tasks of ATSAC. Some of the proposed minimum expertise will be put forward in the rule and that other ideas submitted might be things that could be noted in the group's charter.

C. Proposed ATSAC Membership Terms

Dr. Dixon reviewed the proposed membership terms:

- At least 5, but no more than 7 members;
- DEQ Director will appoint ATSAC members with concurrence with EQC;
- 3-year term; and
- No member may have an actual or potential conflict of interest (ORS chapter 244).

She noted that this language is not new and is in the original rule language. DEQ received written comments from RAC members that DEQ should prohibit service on the committee by scientists who are employed by, consultants to, or otherwise have financial ties that are affected by CAO or other air pollution regulation in the state. The ASTAC rules currently state that "*no member may have an actual or potential conflict of interest as those terms are defined by ORS 244.020.*" DEQ proposes to add clarifying language which states that ATSAC members must also comply with government ethics requirements under Chapter 244. DEQ has not included language on the specific recruitment process to allow some flexibility in recruitment because of the very specialized skillsets needed for TRV review. DEQ intends to outline the recruitment process in a separate ATSAC document.

D. ATSAC Deliberations

Dr. Dixon noted that the current rule provided that:

"Final decisions must be made by a quorum of members based on consensus when possible. If consensus is not possible, decisions will be made by majority vote with a quorum present."

At the last RAC meeting, DEQ proposed to delete this language and replace it with the following:

"DEQ will consider recommendations from all ATSAC members."

She reviewed specific feedback received from RAC members that:

- No consensus or quorum should be required.
- ATSAC should be the independent review body adding validity to DEQ's process. By them taking a vote and having this in the record, both the EQC and public can have a stronger assurance of the outcome.
- Wants ATSAC to approve TRVs by consensus prior to an EQC vote

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After considering RAC comments, DEQ's updated proposal also provides that "ATSAC members will provide DEQ with recommendations that DEQ will report to the Environmental Quality Commission."

She noted DEQ's current thinking that not requiring a formal vote or consensus is the best set-up for the committee. There is a concern that voting or a consensus process is too limiting. She noted that voting assumes everyone's vote is equal. However, sometimes questions will be specific to expertise and DEQ will want to weigh some experts' recommendations higher. A vote could hide important nuance; a member may agree on a TRV but want additional research on a susceptible population. A broader summary of the individual member's recommendations might reflect that concern better than a vote. Gabriela also noted that voting could put a member in an awkward position of not having the expertise to weigh in on a question. Other questions may not have direct yes or no answers. Finally, ATSAC could agree to seek consensus or vote, even if not required by rule.

Dr. Dixon engaged in discussions and addressed questions/comments from RAC members: A RAC member asked whether there might be utility to have consensus that could be invoked for particular things?

- Keith noted that, structurally, the committee could be looking at a number of changes. When ATSAC operated previously, there was an effort to find as much consensus as possible, so the process required a lot of work and discussion time. DEQ considered that it might be more fluid to focus on recommendations and input. The committee could work toward consensus if they choose. Keith also noted that the committee meetings and deliberations would be staffed and supported by DEQ/OHA staff.

Another RAC member noted that the word "recommendation" is very nondescript and recommends DEQ use a clearer vote by the committee of those in favor of the value, those opposed and those that abstain. At the actual adoption of the rules, if members have a strong opinion, they could bring forward a minority report.

- Dr. Dixon noted that the ATSAC would hold public meetings which will be summarized with meeting minutes so there is flexibility to indicate majority opinions. Because some questions might require a weighting of certain opinions, it is helpful to have flexibility to record those recommendations in a report.

E. Petition Process for the TRV Review

Dr. Dixon noted that the existing rules for the petition process allow people to petition to:

- Remove, add or change TRVs; or
- Add or remove a toxic air contaminant from the priority list.

DEQ would then review the petition and have discretion on whether to move forward. DEQ wishes to clarify the timeline and proposes to change the date petitions are due from 18 months before TRV review to October 31 (right before the beginning of the TRV review).

Also, she noted that, under the current rule, requirements for removing a toxic air contaminant from the priority list are unintentionally merged with the requirements for removing a chemical from the TRV list. DEQ proposes to separate requirements for removing a toxic air contaminant from the priority list from the requirements for removing a chemical from the TRV list. This is a housekeeping change: the two lists have different purposes, and it does not make sense to have the same petition requirements apply to both.

Dr. Dixon engaged in discussion and addressed questions/comments from RAC members:

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A RAC member raised concerns that the revised timeline would not provide sufficient time for others to review the petition.

- Dr. Dixon noted that the timeline change would put the deadline for petitions at the beginning of the TRV review, when staff would be reviewing all the authoritative sources for any new process. This would allow DEQ to work on the petitions alongside the review and the two processes could inform each other.

A RAC member asked, what is the integration process for changes for facilities that already have addendums? The concern was expressed that the process and timeline for changes be explicit as there are work and cost implications for facilities.

- Keith indicated that if TRV values were updated, the risk-based concentrations (RBCs) would also need to be updated and any changes to the RBCs would trigger a need for updated risk assessments.

A RAC member suggested that, to promote trust and transparency, DEQ could inform community members about ATSAC membership and provide an opportunity to vet membership.

- Keith noted that community engagement is a priority for DEQ and will be considered as part of the review process. All proposed updates to TRVs/RBCs as evaluated by ATSAC would go through an open rulemaking process with public comment, prior to proposed adoption by the EQC.

Informal Public Comment

Donna invited comments from public attendees, noting that this is their opportunity to share initial thoughts and ideas for the RAC to consider. She clarified that the formal public comment period on draft rule revisions will take place later in 2021. She noted this is not the time to have questions answered by DEQ. Instead, if there are questions, they should be shared to help inform the agencies regarding information needs for future communications.

The following summarizes input from members of the public:

- Greater specificity is needed with regard to what the emissions inventory will include. It was recommended that the data: 1) Be from the actual facility to which the inventory applies; 2) Be recent enough to cover current operating conditions, fuel mix, and other factors that might affect the values; 3) Reflect worst case emissions as referenced in Section 2.9 of the new sources sampling manual; 4) Should incorporate startup and shutdown emissions, if these have been shown to significantly increase emissions of particular toxins to the point that they might change risk assessment decisions; and 5) Use emissions factors based on actual testing at the facility rather than some generic emission factors that might or might not apply to the facility submitting the emissions inventory. This level of specificity is geared toward the goal of CAO, which is to protect public health.
- It could be helpful to have manufacturing stakeholders on the ATSAC committee to speak to the practical roadblocks that manufacturers face. This could help foster more collaborative solutions.
- A question was raised via the Q&A function of the Zoom platform: What will be the requirements for demonstration of the Proposed Minimum Expertise necessary to be a member of ATSAC and how will the demonstrations be verified?

Additional Discussion/Questions by RAC Members

In response to a RAC member's question, Keith provided additional information about the Cease-and-Desist authority. He noted that the Cease-and-Desist authority can be found in Title 5, Division 2; however, the provision does not provide any authority beyond what the Oregon

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statute requires (i.e. a request from the Governor to issue a Cease-and-Desist order.) This authority cannot be expanded beyond what is provided in the statute. He noted that the updates to immediate curtailment provisions seek to clarify requirements for exactly what would happen in critical situations. A RAC member expressed the concern that a layperson might be confused by what is meant by “immediate curtailment” language when the effect on actions does not appear to be immediate.

RAC Roundtable

RAC members shared their thinking and reflections regarding the proposed rule changes and concepts discussed. The comments provided are summarized below. RAC members were encouraged to submit their written input to DEQ directly. (*Note: the following summary is based on individual comments and should not be considered as recommendations or views held by all group members.*)

- RAC members appreciated the information and materials provided and the opportunity to see how their comments were being integrated. There also was appreciation for the themes of transparency, clarity, and communication that DEQ and OHA raised in the discussion.
- It is important for CAO to clearly, concisely, and with advance notice, inform the regulated community and public of program expectations and how the process will play out on-the-ground, as this may affect budgets and planning.
- There was support for, and opposition to, the deletion of the Safety Net program. The concept of a ‘safety net’ is important when considering how to address toxic hotspots that include indirect and mobile sources, which can have a direct human health effect.
- There was concern that the benefits of the ATSAC committee would be diluted by the proposed changes and a desire to see the committee as independent as possible. There was a concern that the proposed rule changes might have the impact of limiting input and vesting more discretion with DEQ.
- It is important for CAO to spotlight success stories, including what DEQ and others are learning through the CAO process (for example, creative efforts by industry to innovate and use less toxic substances, as well as enhanced production processes).
- It is important not to lose sight of non-industrial sources of emissions and the implications for environmental justice communities.
- There is a huge benefit to having a strong and sustained community voice as part of this process. Consider ways for communities to get more involved and better resourced, particularly regarding technical expertise, to fully participate in the CAO process.

Closing Remarks and Next Steps.

Keith noted that DEQ will not be publishing a further redline for comment by RAC members. After DEQ considers the feedback provided on the current redlined versions, DEQ will submit an updated redlined version that considers those comments. Next will be the review of the fiscal impacts of those changes (in April). Once updated, the rulemaking will move into a public comment period. Also, he noted that DEQ has a community engagement coordinator and one of DEQ’s priorities is to develop tools to better explain the program to the public. DEQ will be going to the EQC in March for an informational update; the intent is to publish a report with examples of work that has been done under CAO.

Hannah noted that the deadline for written comments from RAC members is Friday, February 26, 2021. DEQ will be reaching out to schedule the Fiscal Impact meeting for later this year.

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OHA and DEQ staff members thanked everyone for their time and participation in this meeting. With that, Donna adjourned the meeting.

*This summary is respectfully submitted by the impartial facilitation team from DS Consulting.
Suggested edits are welcome and may be sent to Nancy Pionk (nancy@dsconsult.co)*

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Attachment 1

Cleaner Air Oregon Rules Advisory Committee Members in Attendance for all or part of 2/5/21 Rules Advisory Committee Meeting	
Steven Anderson	City of Salem Neighborhood Associations
Jessica Applegate	Eastside Portland Air Coalition
Lisa Arkin	Executive Director, Beyond Toxics
George Conway	Conference of Health Officials; Deschutes County
Chad Darby	Maul, Foster and Alongi
Kathleen Johnson	Washington County
Christine Kendrick	Air Quality Lead/Smart Cities Coordinator, City of Portland
Daniel Lee	Cascade Steel Rolling Mills
Ellen Porter	Alternate for Sharla Moffett, Oregon Business & Industry
Mary Peveto	President, Neighbors for Clean Air
Mark Riskedahl	Northwest Environmental Defense Center, Oregon Environmental Justice Task force/Vulnerable Communities representation
Diana Rohlman	Oregon Public Health Association
Kathryn VanNatta	Northwest Pulp and Paper Association
Thomas Wood	Co-Chair Air and Energy Committee, Oregon Business & Industry