

**Beyond Toxics • Clean Corvallis Air • Crag Law Center • Cully Air Action Team •
Eastside Portland Air Coalition • Neighbors for Clean Air • North Portland Air Quality Group
Northwest Environmental Defense Center • OPAL Environmental Justice
Oregon Physicians for Social Responsibility • Portland Clean Air • South Portland Air Quality Group
The Dalles Air Coalition • Verde**

June 28, 2016

Governor Kate Brown
State Capitol Building
900 Court Street NE, 160
Salem, OR 97301

Mr. Peter Shepherd
Interim Director
Oregon Department of Environmental Quality
811 SW 6th Avenue
Portland, OR 97204-1390

Re: Request for Temporary Moratorium on Renewal of Air Quality Permits in the State of Oregon

Dear Governor Brown and Interim Director Shepherd:

Our organizations represent tens of thousands of Oregonians all across the State, many of whom have suffered for years with adverse health effects associated with air pollution, including emissions of Hazardous Air Pollutants (HAPs) from industrial sources. We appreciate that the State of Oregon and the Oregon Department of Environmental Quality (DEQ) have recently accepted what environmental and public health advocates have known for a much longer period of time – DEQ's air toxics program is woefully inadequate to protect public health, safety and welfare. For far too long, DEQ has permitted industrial air emissions to place a significant number of Oregonians at an unacceptable health risk due to exposures to HAPs including heavy metals, particulate matter, and volatile organic compounds, that are known to cause cancer, exacerbate asthma, and contribute to a host of other serious medical conditions. To prevent any further injustices to our communities, we request that DEQ implement a temporary moratorium on the renewal of air quality permits.

We appreciate that Governor Brown has directed DEQ to reform its air toxics program, and we are looking forward to the development of health-based air toxics regulations in Oregon. Currently, however, DEQ is still unable to identify, assess, and address serious human health risks posed by industrial sources of air toxics. Instead, DEQ has been struggling to respond to citizen outcries for assistance on a site-by-site basis throughout the State as communities learn more about the gaping holes in DEQ's air quality program.

Worse yet, we also know that the status quo often forces communities of color and low-income communities to bear disproportionate health risks from industrial air pollution, because industrial facilities are often located in or adjacent to the very neighborhoods where these communities reside. These environmental justice communities frequently struggle with the most severe barriers to participating in the critical permitting decisions that ultimately affect the health of their children, elders, and the most vulnerable members of their community. Oregon's air

toxics crisis is a critical issue in terms of public health and social justice. To live up to our own vision of Oregon as a leader in sustainability, we must address the unique challenges facing our most at-risk communities.

For these reasons, we call on the Governor to suspend DEQ's renewal or approval of all air quality permits until the Oregon Environmental Quality Commission (EQC) has approved the new air toxics regulations. Currently, there are many renewal applications all over the State pending before DEQ, and if approved, those permits will again authorize emissions under an inadequate regulatory program that fails to protect human health. Until the EQC establishes a new set of protective air quality regulations, it is impossible to know how those permit renewals may affect public health. Instead of expending limited agency resources to process those pending applications under the current under-protective regulatory regime, DEQ should instead reallocate staff time to completing the new air toxics regulations and supporting the many communities around the State currently struggling with harmful industrial emissions. Instead of authorizing more pollution before these regulations come online, DEQ's staff time would be far better spent improving DEQ's air toxics program and protecting public health. In the meantime, as DEQ is well aware, facilities that have timely applied for permit renewal can continue to operate under their expired permits.

We understand that this is the approach that DEQ is taking with respect to the pending renewal application for the South Portland emitter Precision Castparts. The rest of the communities around Oregon impacted by industrial air pollution deserve the same opportunity to address similar risks in their neighborhoods. Every community in Oregon deserves the same protections for public health.

Sincerely,

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