

## Senate Bill 1541 – Legislation to Direct ODEQ to Reduce Public Health Risk Due to Air Toxics

Thank you for the opportunity to speak in favor of Senate Bill 1541. My name is Kathy Sperle. I am the Environmental Manager for Boise Cascade Wood Products' mills in western Oregon. I am speaking on behalf of the company. We currently have nine wood products mills in Oregon, all in small to mid-size communities. We currently employ approximately 1400 people in Oregon. Our employees earn good wages and good health insurance benefits – both very important to good health.

Boise Cascade is very concerned about the proposed Cleaner Air Oregon rules. The proposed rules will create one of the most restrictive air toxics program in the country at potentially great cost. We are concerned that Oregon DEQ has proposed rules for which we cannot reasonably determine the impact to our operations without spending a significant sum on air quality modeling for all of our facilities. We are concerned that DEQ has neither adequately assessed the economic impacts of the proposed rules, nor adequately demonstrated the health benefit of the rules. But most of all we are concerned that DEQ has rushed to create environmental rules to solve a political problem rather than a public health problem. We have commented extensively on the proposed rules and we submit our comments to those rules as part of these comments.

Boise Cascade has spent millions of dollars controlling air pollution at our Oregon mills over the past 25 years. We have installed emission controls on our boilers and veneer dryers to significantly reduce particulate matter, volatile organic compounds and hazardous air pollutants including many of the air toxics that will be regulated under the proposed Cleaner Air Oregon rules. Boise Cascade will continue to add emission controls to comply with state and federal rules or when such controls are necessary to protect the community from a demonstrated public health problem.

Boise Cascade recognizes the need to address deficiencies in Oregon's air toxics program recently revealed in Portland. We have operations in states, such as Louisiana, with more rigorous air toxics programs than Oregon's current program. In contrast to Oregon, Louisiana is dominated by large chemical industries that emit thousands of tons of air toxics, and it's easy to justify a rigorous air toxics program there. Yet Oregon's proposed regulations will be more stringent than Louisiana's air toxics program. Our wood products mills are only minor emitters of air toxics relative to the large chemical industries, and the controls we use to reduce air toxics emissions in accordance with federal standards are accepted as adequate to meet state air toxics controls in Louisiana. We have recommended to Oregon DEQ that any proposed air toxics regulations should ensure state TBACT controls should not be more stringent than federal MACT controls. We believe that is a crucial part of SB 1541 so that we don't burden our Oregon mills with controls not required in other states.

Boise Cascade supports legislative efforts, such as SB 1541, that will create a rigorous air toxics program to reduce the health risk associated with air toxics emissions without creating unnecessary devastating impacts to Oregon industry. If Oregon DEQ insists on implementing their air toxics program as proposed, we encourage the legislature to withhold funding for DEQ's air toxic program.

Thank you again for the opportunity to speak in favor of SB 1541. We appreciate your willingness to consider such important legislation.