

Cleaner Air Oregon Toxic Air Contaminant Review and Update Rulemaking Advisory Committee (RAC)

Meeting 1: Jan. 12, 2026, 9 a.m.-12 p.m. PT

Meeting Minutes

Meeting Attendees

RAC Members

Travis Quarles	Bridgewater/Trinity Consultants
Sharla Moffett	Oregon Business and Industry
Deborah Proctor	ToxStrategies
Geoffrey Tichenor	Stoel Rives
Jim Spahr	Cascade Steel Rolling Mills
Cassandra Jackson	Port of Portland
Crystal Weston	Oregon Environmental Council
Jonah Sanford	Northwest Environmental Defense Center
Xitlali Torres	Verde
Molly Kile	Oregon State University
Mary Peveto	Neighbors for Clean Air
Nadège Dubuisson	Multnomah County Health
Patricia Kullberg	Oregon Physicians for Social Responsibility
Ryan Ramage	Valley Environmental LLC
Beth Ryder	Trinity Consultants
John Bird	Roseburg Forest Products

Project Team

Ali Mirzakaiili	Oregon Department of Environmental Quality (DEQ)
Apollonia Riberdy	DEQ
J.R. Giska	DEQ
Mike Poulsen	DEQ
Dana Crosby	Oregon Health Authority (OHA)
David Farrer	OHA
Gabriela Goldfarb	OHA
Holly Dixon	OHA

Facilitation Team

Ben Duncan	Kearns & West
Angela Hessenius	Kearns & West

Meeting slides will be available on the rulemaking website ([link](#))

Welcome and Introductions

J.R. Giska, Oregon Department of Environmental Quality (DEQ), welcomed attendees to the Cleaner Air Oregon Toxic Air Contaminant Review and Update Rulemaking Advisory Committee (RAC) Kickoff Meeting and thanked the RAC members for serving as committee members in this rulemaking process.

Ali Mirzakalili, Oregon Department of Environmental Quality (DEQ), welcomed everyone and thanked the RAC members for participating on this committee. Ali noted that this kickoff meeting is intended as an introduction and orientation to the rulemaking process and materials and that the opportunity to have robust discussions about the proposed rules will occur in future meetings.

Gabriela Goldfarb, Oregon Health Authority (OHA), shared that this is the first toxicity reference value (TRV) update in the implementation of the Cleaner Air Oregon program. Gabriela thanked Holly Dixon and David Farrer for the intensive effort they have completed to date compiling an extensive body of information that is reflected in the proposed rules and explanatory materials shared with the RAC members during this meeting. Gabriela also thanked the volunteer members of the Air Toxics Science Advisory Committee (ATSAC) that DEQ convened who were eminent experts who dedicated a lot of time and knowledge to provide independent review of the team's proposals to ensure they were based on robust and credible science.

Ben Duncan, Kearns & West (K&W) facilitator, reviewed the Zoom webinar protocols, reviewed the meeting agenda, and facilitated introductions from the RAC members and the DEQ-OHA project team.

RAC Charter and Scope

J.R. Giska, Oregon Department of Environmental Quality (DEQ), reviewed the scope of the RAC. The primary function of this committee is to provide discussion and feedback on the proposed rules. This includes a number of lists and tables that DEQ uses for reporting and regulating toxic air contaminant emissions. This scope also includes providing feedback on the fiscal impacts of the proposed rules to this program, including a discussion of how DEQ proposes to implement the new standards if adopted. J.R. added that the scope of this committee is not to serve as a technical advisory committee providing in-depth technical discussions with DEQ and OHA on the scientific basis used for developing the proposed standards values. Committee members will be welcome to share their ideas and generate productive discussions on the proposed values and underlying review methodology used to develop them. DEQ and OHA will provide clarification and may elect to answer some questions related to decisions and methodologies used, but will not engage in substantive, highly technical scientific arguments about proposed values during these meetings, as this was the primary focus of the Air Toxics Science Advisory Committee (ATSAC) convened for this rulemaking. J.R. also clarified that these RAC meetings are not considered a formal public comment period. A formal public comment period will be held after the RAC meetings conclude. Subsequent RAC meetings will allow for public input so that the RAC members can incorporate public feedback into their discussions as applicable.

J.R. shared that the RAC Charter is an important document DEQ provides for any Rules Advisory Committees that are convened. The RAC charter outlines the expectations and

guidelines for how all members, agency staff, and facilitators will work together during the rulemaking process. DEQ provided the charter ahead of the meeting for members to review. Ben asked the RAC members if they had any clarifications or questions on the components of the RAC Charter.

Discussion:

- **Geoffrey Tichenor** asked DEQ and OHA to clarify when and how it will be appropriate to engage in substantive, highly technical discussions.
- **J.R.** responded that during this meeting, the DEQ and OHA team will review materials and the ATSAC process with the RAC members, and that they can discuss the methodologies that were used. If there are highly technical questions about the scientific process used to develop these materials, those are welcome to be submitted during the formal public comment process with written comments. J.R. also noted that DEQ and OHA can reach out to the ATSAC again for feedback if they receive substantive scientific questions that merit a response from the ATSAC.
- **Sharla Moffett** agreed with Geoff's comments and added that the expectation going into this rulemaking process was that there would be scientific discussions. Sharla also noted a concern around the timing of requesting scientific comments during the formal public comment period because the draft rules will have already been written by that point and it is important to have those conversations earlier on to meaningfully incorporate those comments and input.
- **J.R.** clarified that the intent is to have scientific discussions, and that RAC members will be invited to share scientific information to review and discuss with each other in RAC Meetings #2 and #3. J.R. noted that there are limitations on how deep into toxicological discussions they can go as a general RAC committee and the goal is to strike the right balance.
- **Mary Peveto** added that when the Cleaner Air Oregon (CAO) program rules were adopted by statute in 2018, a core principle was to reconfigure the ATSAC process to ensure an objective scientific process to review risk levels. Mary expressed that community is looking for assurances from DEQ and OHA that they will follow these principles to provide robust, objective, up-to-date scientific information to establish the health benchmarks for the program.
- **Crystal Weston** expressed appreciation for the underlying scientific work that was already done and shared that she looks forward to continuing to discuss the science to make sure it serves the public health.
- **Ali** clarified that DEQ heard the request from RAC members to discuss the science underpinning the proposed rules and that there will opportunities in future RAC meetings for those discussions.
- **Gabriela** added that the goal of this meeting is to present materials to the RAC members and that the spring RAC meetings are intended to provide an opportunity to discuss any additional information that the RAC members bring forward to the agencies that had not previously been reflected or considered.

Rulemaking Background

J.R. provided background information on rules related to reporting and regulating toxic air contaminants in Oregon and the current rulemaking process.

The Clean Air Oregon program rules were adopted by the Environmental Quality Commission (EQC), DEQ's governing body, in November 2018. These rules established DEQ's Toxic Air Contaminant regulatory program that requires commercial and industrial facilities to assess potential health risks to the public from emissions of toxic air contaminants from their production activities. In April 2020, the EQC adopted the CAO Hazard Index Rules. The EQC adopted the Air Toxics Alignment and Update Rules in November of 2021. These rules established a new Toxic Air Contaminant Standards Division, Division 247. Both the reporting list of contaminants and the health standards that were previously contained under the CAO program rules were migrated to this new division, along with the rules providing for the review and update of these values.

The rules in Division 247 require a periodic review and update to the health standards for toxic air contaminants. Currently, this frequency is set at every three years. When the health standards are revised, this automatically requires updates to the regulatory values used in the CAO program, as those values are developed directly from the health standards in Division 247. The rules also provide the process for reviewing and updating the standards, which includes a list of authoritative sources to review for updates and allow for members of the public to petition DEQ to make updates to specific standards. The rules also provide for the establishment of an Air Toxics Science Advisory Committee (ATSAC) to support the review and update process. This committee provides technical review of the science used to develop the proposed updates to the standards, but serves only in a consultative role and is not ultimately decisional when developing the final proposed values.

Due to the highly technical nature of this rulemaking, it proceeded in two phases. The first phase was the technical scientific review, which included developing the proposed health values, convening the ATSAC meetings, and incorporating feedback from the ATSAC and revising the proposed values as applicable. The second phase is the formal rulemaking process which includes these RAC meetings, a public hearing and comment period, and will conclude with the presentation of the proposed rules to the EQC for adoption.

The content of this rulemaking includes the 1) Toxic Air Contaminant Priority List ("Priority List"), which is the list of contaminants that DEQ uses for monitoring and reporting of emissions, 2) the table of Toxicity Reference Values (TRVs), which are the health standards for toxic air contaminants in Division 247, and 3) the table of risk-based concentrations (RBCs), which are the regulatory standards used in the CAO program that are based on the TRVs. DEQ is also proposing changes to the rule language itself regarding the frequency at which the agency is required to review and update these standards and allowing for flexibility when adjusting some of the RBCs in special cases when performing a risk assessment. The RAC will also spend time discussing the proposed implementation plan for these rules.

The Priority List contains the list of contaminants that are known or suspected to cause harm when inhaled, and is based on information from primary sources listed in rules in Division 247. This list provides facilities with the list of contaminants that they are required to use to report their emissions of toxic air contaminants and expands the reporting of contaminants beyond what is required under the federal Clean Air Act. It is also used by DEQ's Ambient Monitoring Group when assessing ambient monitoring data on toxic air contaminants. The Priority List includes the most contaminants because although DEQ requires emissions reporting for all the contaminants on the list, not all of these contaminants currently have sufficient toxicological information to develop health standards.

Holly Dixon, Oregon Health Authority (OHA), provided background information on the development of the TRV proposals.

Toxic air contaminants can cause a wide range of health problems, also called health effects. These health effects from contaminant exposures fall into two main types: cancer and noncancer health effects. Toxicologists assess these categories separately because they follow different principles and assumptions. For noncancer health effects, toxicologists assume that there is an amount of exposure to the contaminant that is too low to cause health problems, called a “threshold” amount. In contrast, toxicologists assume that there is no amount of exposure to a cancer-causing contaminant that is free of risk. To evaluate the potential for cancer risk in a population, acceptable cancer risk target levels are set at very low levels.

To understand what air contaminant exposure means for health, DEQ uses toxicity reference values (TRVs), which are listed in Oregon Administrative Rule. Noncancer TRVs are the amount of an air contaminant that a person can breathe without health problems. Cancer TRVs are the amount of an air contaminant a person can breathe at which about one additional person per one million people could develop cancer over a lifetime. This level of risk is low enough it would not stand out from the background rates of cancer in a population.

Holly noted that the TRVs are designed to protect the health of everyone, including those who may be especially sensitive to contaminant exposures, such as children, pregnant people, and people with health issues. A contaminant may have up to three different inhalation TRVs for its different health effects: one for cancer, and one for each of two types of noncancer exposure, which are acute (short-term exposure) and chronic (long-term exposure).

Holly shared the list of sources that DEQ considers to be authoritative in terms of their scientific rigor and comprehensive methods for producing TRV information, which are listed in rule. These include the U.S. Agency for Toxic Substances and Disease Registry (ATSDR), the U.S. Environmental Protection Agency (EPA), the California Environmental Protection Agency (CalEPA), and Oregon DEQ in consultation with ATSAC.

Holly shared that the TRVs are important for DEQ air quality programs including DEQ’s Air Toxics Monitoring Program and DEQ’s Cleaner Air Oregon regulatory program, which uses TRVs to generate Risk-Based Concentrations (RBCs).

Mike Poulsen, Oregon Department of Environmental Quality (DEQ), provided information on the RBCs. RBCs are the regulatory values used in the Cleaner Air Oregon program, which are derived from TRVs by considering exposure. To calculate the RBCs, DEQ applies adjustment factors, which are tied to exposure scenarios, to the TRVs to account for exposure time, frequency, and duration, as well as additional impact for infants and children and exposure through pathways other than inhalation.

Questions and Discussion:

- **Patricia Kullberg** asked about how co-exposures that can increase are accounted for. For example, if someone is exposed to both benzene and diesel at the same time (which is more common), how is that considered?
 - **Holly** responded that people are exposed to multiple chemicals at a time and individual chemicals can interact with each other. For risk assessments and developing TRVs, it is common for TRVs to be developed for one chemical at a

time using toxicological information from the authoritative sources. Then risk assessors use that individual chemical information to evaluate health risks from the total mixture of chemicals that people are exposed to. Diesel particulate matter (DPM) is the one exception to this where DEQ and OHA are developing a TRV for a complex mixture of exposure rather than an individual contaminant.

- **Mike** added that when they develop the RBCs, it is possible to sum the risks for cancer and non-cancer risks for chemicals.
- **Patricia** added that summation does not capture potentiation, when there is an interaction between two toxics that increases the toxicity.
- **Holly** responded that the integration of individual TRVs happens in the risk assessment stage. It is true that sometimes when chemicals interact in a mixture it can be more impactful to health than if you summed the individual risks; it can also be the opposite. Studies have shown that most often it is health protective to sum the individual risks, and that is the precedent.
- **Xitlali Torres** asked about how the multi-pathway adjustment factor is implemented and how it informs other DEQ programs that address other pathways of exposure beyond inhalation.
 - **Mike** responded that this will be covered in more detail in the next section.
- **Travis Quarles** commented that it could be helpful for DEQ and OHA to point out when safety factors are built in along different parts of this process to help increase RAC members' understanding of how the program is health protective.

Rule Update Process

J.R. presented on the updates that are being proposed during the current rulemaking process.

DEQ is proposing to expand the Priority List from 606 to 650 reportable contaminants. This is primarily driven by including toxic air contaminants with recently established TRVs, meaning that there is new information that these contaminants cause quantifiable health effects when inhaled and DEQ is proposing a new health standard for these pollutants. DEQ also added a small number of contaminants of specific interest in Oregon. In total, DEQ is proposing to add 95 new reportable contaminants to the Priority List. Other changes to the Priority List include organizational changes such as the grouping of previously individually listed contaminants.

Holly reviewed the proposed updates to the TRVs. OHA followed a multi-step process to review and update TRVs.¹ This was a complex process that OHA has been working on for over three years. For Phase 1, OHA set up the review process, which included setting up the ATSAC, setting up a petition process, planning the process to identify candidate TRVs from authoritative sources, and creating a review tool to track candidate TRVs and OHA's proposals. Holly noted that this step included building an entire new tool for housing and organizing the TRV information, which took a lot of time. For Phase 2, OHA recorded all the TRV candidates from all of DEQ's authoritative sources. In addition to the TRV itself, OHA also recorded additional information on how the TRV was developed and calculated by each source into the TRV review tool. For Phase 3, OHA selected TRVs for proposal for each contaminant.

¹ More information on the TRV update and review process can be found in Chapter 2 of the [TRV Support Document](#).

Holly noted that feedback from the ATSAC was a key part of this entire process and integrated into all phases of work. In 2022, DEQ convened the ATSAC for this round of TRV updates. During the ATSAC meetings over the past few years, DEQ and OHA asked the ATSAC to first review and provide feedback on the overall TRV review and update process and then bring attention to questions related to specific TRVs. Holly also reviewed the Division 247 Rules governing the ATSAC and shared the list of ATSAC members and their affiliations. Each member's expertise aligns with what is required by rule.

During ATSAC's term, DEQ and OHA held eight ATSAC meetings. Holly reviewed the timing and focus of each of these meetings. After the final ATSAC meeting in May 2025, OHA spent several months carefully summarizing and incorporating all of ATSAC's feedback into the proposals and supplemental materials to prepare for this RAC phase of the rulemaking. All of the ATSAC meeting materials including video recordings, written meeting minutes, and all ATSAC-related documents can be found on the [DEQ ATSAC website](#).

While all ATSAC members were generally supportive of the process followed, ATSAC members provided a great deal of valuable feedback that resulted in changes to TRV proposals and how OHA and DEQ displayed and explained TRV information in OHA's TRV supplemental materials. After the ATSAC meetings, OHA updated 113 TRVs across 70 toxic air contaminants in preparation for these RAC meetings. Of these 113 TRVs, 92% of them were changes in direct response to ATSAC feedback. [Appendix A: OHA's Response to ATSAC Feedback](#) summarizes all the changes that OHA made in response to ATSAC feedback.

Holly provided an overview of the preliminary proposed TRV changes. Overall, there are currently 623 proposed TRVs for 377 contaminants.² 47% of these TRVs are the exact same as the TRV adopted in 2018 rule [292 TRV proposals]. 32% of the 623 TRV proposals are new TRVs, meaning there was no TRV in 2018 and OHA consulted ATSAC on a new TRV [197 TRV proposals]. The remaining 21% of the TRV proposals are changes to the 2018 TRV [134 TRV proposals]. The latest science published by the authoritative sources led OHA to recommend many new TRVs and make updates to existing TRVs.

Holly highlighted that there were many instances where more than one candidate TRV was available from the authoritative sources. There are 276 proposed TRVs where TRVs are available from more than one authoritative source.

In addition, there are 237 proposed TRVs where DEQ in consultation with ATSAC is the authoritative source. These proposed TRVs fit into three categories: 1) unmodified TRVs issued by an ATSAC-recommended alternate source, 2) modified TRVs from the EPA, ATSDR, or CalEPA, or 3) modified TRVs from an ATSAC-recommended alternate source. ATSAC encouraged OHA and DEQ to check alternate sources for candidate TRVs only in certain circumstances, such as when none of the other authoritative sources have a candidate TRV for a contaminant³.

Questions and Discussion:

² More detail on these numbers and outcomes is available in Section 2.3 of the [TRV Support Document](#).

³ More information on the TRV update and review process can be found in Chapter 2 and Chapter 5 of the [TRV Support Document](#).

- **John Bird** asked how the periodic state emission inventories are used in the TRV evaluation process and if compounds that are not emitted in Oregon are excluded from the TRV list or planning to be removed from the list.
 - **J.R.** responded that DEQ uses the periodic statewide inventories to track what toxic air contaminant emissions are like in the state, including which chemicals are and are not being emitted. Within the petition process, members of the public are able to request contaminants to be removed from the reporting list and the TRV lists. At this time, DEQ is not proposing to remove any pollutants from either the reporting list or the TRV and RBC lists if they had not been reported in Oregon on the air toxic submissions inventories.
 - **John** asked as a follow-up whether the chemicals that are proposed to be added to the Priority List are known to be emitted in Oregon and how DEQ and OHA are making sure they are efficiently using their toxicologists' time.
 - **J.R.** responded that the chemicals that are proposed to be added are known to be emitted in commercial industrial activities and are known to have health effects. It is a time-consuming and intensive process to update the TRVs, but it would be much more difficult to continually add new chemicals to the list on an ad hoc basis than to ensure they have health protective values ready to assess new health risks and be forward-looking for new businesses entering Oregon.

Mike shared that RBCs are calculated by taking the acceptable risk level (tied to the TRVs) and calculating the corresponding air concentration. These calculations include adjustment factors that are used to take the TRVs and develop the RBCs for different exposure scenarios, which include Residential, Nonresident Child, Worker, and Acute.

Mike provided an overview of the adjustment factors that are used. The nonresidential adjustment factors (NRAFs) are not being revised from the original 2018 rules. Residential RBCs are equivalent to TRVs because they are based on constant exposure over a long period of time, and nonresidential RBCs are based on reasonable maximum exposure assumptions. Early life adjustment factors (ELAFs) are used because there are certain carcinogens that harm a cell's genetic material and can have greater toxicity during early life stages. DEQ uses age-dependent adjustment factors provided by EPA to take into account that infants and children are more susceptible to harm from certain chemicals to modify the RBCs. DEQ also uses multi-pathway adjustment factors (MPAFs) that include pathways other than inhalation, which are important for certain compounds such as metals and inorganics that get deposited rather than degrade in the atmosphere. In addition to inhalation, these pathways include contact with soil, uptake into plants, and breastfeeding. The approach for these MPAFs came from the South Coast Air Quality Management District in California. DEQ is proposing some modifications to the MPAFs including focusing on age with the higher exposure (0-2 years) for noncancer effects and updating assumptions on root uptake and gastrointestinal relative absorption. They also separated the nonresidential MPAFs into child and worker categories and are incorporating the ELAFs into the MPAFs for chemicals with early-life effects.

Questions and Discussion:

- **Deborah Proctor** asked if DEQ is revising MPAFs or applying them to new chemicals?
 - **Mike** responded that DEQ is doing both. They are modifying the MPAFs based on updated assumptions and they are applying them to new chemicals that have been added to the list that are long-lasting and can bioaccumulate.

Materials and Resources for RAC Members

J.R. provided an overview of the materials available for assisting RAC members with reviewing information for this rulemaking process. As indicated in the charter, the committee members are required to review and provide feedback on all of the proposed rule changes, including the Priority List, TRVs, RBCs, and the proposed rule language updates. DEQ and OHA have compiled a number of supporting documents to supplement RAC members' review that are available on [the website](#).

These supplemental resources include the following;

- Priority List:
 - [Appendix Workbook to the Priority List](#) – includes additional information that is useful for sources when reporting emissions for a CAO risk assessment.
 - [Priority List Support Document](#) – provides more information on the rationale for making the proposed revisions to the list.
- TRVs:
 - [TRV Support Document](#) & [TRV Support Document Appendices](#) – provides technical background and rationale for all the TRV proposals in this rulemaking.
 - [Workbook 1: DEQ Proposed TRVs](#) – provides a broad overview of all proposed TRVs.
 - [Workbook 2: TRV Derivation](#) – includes more detailed information on how each TRV was calculated.
- RBCs:
 - [Adjustment Factors Supporting Document](#) – provides background information on the proposed changes to the ELAFs and MPAFs.
 - [MPAF Tool](#) – used by DEQ to calculate the MPAFs and can be used for site-specific calculations.
- Fact Sheets:
 - [Noncancer Health Risk Fact Sheet](#)
 - [Excess Cancer Risk Fact Sheet](#)
 - [TRVs to RBCs Fact Sheet](#)
 - [HI3/HI5 Fact Sheet](#)

Holly reviewed the TRV supplemental resources and emphasized that the intent was not for RAC members to read and review the entire documents and workbooks provided, but to use them to help answer questions about OHA and DEQ's TRV review processes or specific TRVs.

J.R. shared that in addition to the materials developed by DEQ and OHA, Oregon Business and Industry (OBI) has submitted technical information for consideration during the RAC process. This information will be made available on the RAC webpage. If any other RAC members have information or specific topics they would like to consider for discussion in subsequent RAC meetings, they are invited to submit those via email to Apollonia.RIBERDY@deq.oregon.gov or caotrv.2026@deq.oregon.gov.

J.R. also shared the Implementation Draft Proposal for this rulemaking. For sources that have not yet begun a risk assessment under the CAO program before rule adoption, DEQ is proposing to follow the procedures in rule when they perform their risk assessments and use the newly adopted RBC values. For sources that are either in the process of performing a risk

assessment or have already completed one at the time of rule adoption, DEQ is proposing that they would not be required to reassess risk using the revised standards until either their permit renewal, or when a permit modification is submitted, whichever comes first.

Questions and Discussion:

- **Mary Peveto** thanked DEQ and OHA for the work of sharing these materials and for the improvements that have been made with regard to the development of risk values since the adoption of the Cleaner Air Oregon program. These changes are in line with what the statute required to improve transparency and understanding of the decision-making process.
- **Mary Peveto** asked if the letter submitted by OBI will be made publicly available.
 - **J.R.** confirmed that the letter from OBI will be posted on the [RAC web page](#), as well as any other additional information submitted by other RAC members.

Next Steps for RAC Members

The next steps for the RAC are Meetings 2 and 3, which will include technical discussions of the proposed rule changes. Meeting 4 will be a space for discussing how these rules will be implemented and providing feedback on the potential fiscal impacts of these rules.

Prior to Meetings 2 and 3, DEQ will offer office hours for all RAC members. These office hours will be dedicated times that members can schedule individually or as a group to meet with DEQ and OHA staff to understand the proposed rules and walk through the supplemental materials. This time will not be a forum for providing feedback or debating the technical aspects of the proposed rules or implementation; these conversations will occur during the appropriate times in the RAC meetings so that all members may participate. RAC members may request to schedule office hours by sending an email to caotr.2026@deq.oregon.gov.

Questions and Discussion:

- **Geoff Tichenor** shared comments that DEQ's proposal will reshape the CAO program, and it is imperative that there be a robust, transparent process around the establishment of the hundreds of new proposed values that DEQ, OHA, and the ATSAC have considered. It is important that the science be considered to the fullest extent possible in this rulemaking.
 - **J.R.** responded that there was a robust process to develop the TRV proposals and that the ATSAC weighed in heavily to determine which of the candidate TRVs from authoritative sources were selected.
- **Patricia Kullberg** shared an appreciation for the amount of work that has gone into the process to date and asked about how the RBCs will be applied and whether they will be applied to stack testing.
 - **Mike** shared that the RBCs are applied to evaluate risk at facilities and tied to the permitting process. Most of this is done with modeling from emissions to determine whether or not they exceed the RBCs.
 - **J.R.** added that the RBCs are the regulatory mechanism for the CAO program. The TRVs are also used by the ambient monitoring group at DEQ.
- **Crystal Weston** shared that it is important to balance public input with science and that it is a strength of the ATSAC process that ATSAC members are required to not have any

conflicts of interest, which allows for a separation of the discussion of the science and a discussion with robust public input on the applications of that science.

Ali shared appreciation for all the RAC members' engagement and participation and that DEQ looks forward to their thoughtful input in this critically important rulemaking process. Gabriela also thanked the RAC members for their engagement and time, and shared appreciation for the RAC members' patience as OHA developed materials to make the supplemental information as accessible as possible for the RAC members to support them in their central function of bringing forward information to the agencies that they may not have considered.

Ben thanked everyone for participating and adjourned the meeting.