State of Oregon
DEQ Department of Environmental Quality

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

Meeting 2: May 18, 2026, 9 a.m. - 12 p.m. PT / Zoom

Meeting slides are available on the rulemaking website (link).

Meeting Attendees

RAC Members: Travis Quarles - Bridgewater/Trinity Consultants, Deborah Proctor – ToxStrategies, Geoffrey Tichenor - Stoel Rives, Jim Spahr - Cascade Steel Rolling Mill, Cassandra Jackson - Port of Portland, Crystal Weston - Oregon Environmental Council, Jonah Sanford - Northwest Environmental Defense Center, Cheyenne Holliday – Verde. Molly Kile - Oregon State University, Mary Peveto - Neighbors for Clean Air, Nadège Dubuisson - Multnomah County Health, Kathleen Johnson - Washington 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 Mirzakalili - Oregon Department of Environmental Quality (DEQ), Apollonia Goeckner – DEQ, J.R. Giska – DEQ, Clara Funk - DEQ, Mike Poulsen – DEQ, David Farrer - Oregon Health Authority (OHA)

Facilitation Team: Ben Duncan - Kearns & West, Angela Hessenius - Kearns & West

Meeting Minutes

Welcome and Introductions

Ali Mirzakalili, Oregon Department of Environmental Quality (DEQ), welcomed everyone and thanked the RAC members for their time and for participating on this committee.

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) Meeting #2 and thanked the RAC members for serving as committee members in this rulemaking process. J.R. shared that the purpose of RAC Meetings #2 and #3 are opportunities for all the RAC members to provide feedback and have discussions among each other regarding the proposed rules.

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

J.R. reviewed the meeting agenda and reminded the RAC members of the Toxicity Reference Value (TRV) update rulemaking process.

Priority List

Clara Funk, Oregon Department of Environmental Quality (DEQ), introduced the Priority List and the high-level proposed changes for this rulemaking. The Priority List of Toxic Air Contaminants (TAC) is a list of chemicals known or suspected to cause harm when inhaled. In rule, the Priority List is Table 1 of Division 247. The Priority List allows DEQ to track and understand emissions across Oregon through the periodic statewide Air Toxics Emissions Inventory reporting, and as the required reporting list for the Cleaner Air Oregon program, or Division 245. For this update rulemaking, DEQ focused on adding TACs that have new TRVs and improvements for clarity and completeness. The proposed changes include new TAC additions (95 new TACs, 92 with TRVs, expanding the Priority List from 606 to 650 TACs, and organizational changes that include consolidating some chemical groups.

Priority List Discussion

- **Travis Quarles** asked why the decision was made to add several petroleum-based compounds (e.g., evaporative fuel oil #2, JP4578, kerosene) to the Priority List when these are mixtures of chemicals, how that will work in the inventory and risk assessment stages, and if that could lead to double-counting of risk.
- **Clara** responded that these mixed compounds were added because there were TRVs available for these specific substances.
- **Travis** asked a follow-up question of whether other jurisdictions have taken a similar approach for these mixed compounds.
- **Clara** responded that DEQ will look further into this question.
- **Geoff Tichenor** shared a comment that since the Cleaner Air Oregon (CAO) Program's adoption in 2018, only a few existing facilities have been taken through the program to completion and shared concerns that the CAO program is too complex to administer. Rather than making this process more efficient and predictable, this rulemaking and the proposed additions to the Priority List will make this program even more burdensome and complex. Geoff encouraged the RAC and the agencies to think about the CAO program's implementability as they evaluate what is appropriate.
- **Crystal Weston** asked how regulating mixtures such as kerosene instead of individual toxics would reduce regulatory complexity.
- **J.R.** responded that the consolidation of these mixed compounds to a single TRV that is based on weighted average of the component chemicals would be a way to make it more efficient compared to tracking the different percentages for each of the specific chemical components. If information is provided during a risk assessment indicating that the chemical concentrations in a compound are very different from the assumptions used to develop this TRV, then there is an opportunity during the risk assessment stage to make sure that they are accurately representing what is being emitted.
- **Beth Ryder** asked to define what the compliance method would be for a facility to showcase the test method for evaporative fuel oil #2 and diesel particulate matter (DPM) for a diesel engine.
- **Clara** clarified that evaporative fuel oil #2 is not related to combustion.
- **Patricia Kullberg** shared support for substantially lowering the cancer TRV for DPM. Patricia also shared that residents experience substances like DPM as a mixture and the component chemicals have multiple interactions that change their health effects, so it is appropriate to evaluate the health effects of DPM as a mixture.
- **Jonah Sandford** responded to Geoff's comment and shared that the CAO regulations call for the Priority List to be updated as the various authoritative sources identify new or updated TRVs. Given that the TRV update rulemaking process is already a year or two behind the schedule laid out in the regulations, it is important for public health to keep this rulemaking process moving forward and to put the newly identified TRVs in place.
- **Beth Ryder** asked for clarification on how DPM is defined and how pollutants that are considered a grouping will be handled during risk assessment since they also include metals and other components.
- **J.R.** responded that in general, DEQ does not want to double count, since DPM might be composed of multiple TACs. J.R. shared that this will be a good discussion topic during the TRV discussion section.
- **Molly Kile** shared support for including DPM on the Priority List since there has been a growing body of evidence and research that demonstrates the human health impact. Also, there is a National Institute of Standards and Technology (NIST) International Certified Standard for DPM which would allow it to be measured uniformly and standardly. With regard to the other mixtures such as kerosene, it does not have the same NIST certified standard for it and instead is measured based on its sulfur content. The ability to measure a substance should be considered when determining whether or not it should be included on the Priority List.
- **Mary Peveto** shared appreciation for the comments about the health impacts of DPM and would like to learn more about whether or not DEQ's currently proposed structure leads to double counting. Mary also shared a question for other RAC members: What would a program look like to address diesel emissions, given that diesel is probably one of the most significant toxics causing health risks in communities?
- **John Bird** shared that the proposed TRV for DPM is being lowered by 97%, and the vast majority of use by stationary sources in Oregon is for emergency engines. Diesel engines are the most reliable engines for wildfire protection applications, and reliability during a fire emergency is crucial for public safety. John recommended an exemption for DPM emitted during emergencies and shared that it will

be difficult for industries to get through air toxic modeling with this significant lowering for DPM on these engines.

- **J.R.** clarified that the TRVs are not only applicable to the CAO program for stationary sources, they are also used across the agency for air toxics monitoring and assessing the health risk to Oregon residents, which includes transportation and mobile sources. The Risk Based Concentrations (RBCs) are used to assess risk from stationary source facilities under the CAO program. J.R. also noted that DEQ does not regulate emergency engine use during an emergency; the primary time when DEQ assesses risk from these engines is during their normal testing and maintenance.
- **Kathleen Johnson** shared that the core of this program and these rules is to prevent public health impacts. While diesel generators are used to protect public safety from wildlife risk, this is not only a rural issue, and that diesel backup generators are also used in other situations, such as during peak demand periods for the energy grid. Data centers are also a growing issues in Oregon and rely on diesel generators for backup power as well. Kathleen commented that from a public health perspective, it makes sense to consider future states of what diesel generators might be used for and account for those uses now within these rule processes.
- **Patricia Kullberg** shared that her understanding is that the greatest source of DPM pollution in the Portland metro area are diesel trucks and mobile sources rather than stationary sources, and that this is particularly an issue for places like the Critical Energy Infrastructure (CEI) Hub. Patricia asked how this issue will be addressed, whether through this rulemaking process or another program.
- **J.R.** responded that the TRVs are not only used for regulation under the CAO program, but they are also the basis for the ambient benchmark concentrations, (ABCs) which would be updated by this rulemaking process. The only regulatory capacity that these values will serve currently is in the CAO program as the basis for the RBCs, and mobile emission sources are not taken into account when conducting a risk assessment for a stationary source facility. This question may be addressed further when discussing implementation of the proposed rules.
- **Crystal Weston** shared that diesel engines are used extensively as backup power for data centers during power shortages.
- **Mary Peveto** asked what the criteria are for defining “emergency” uses of generators and for what purposes.
- **J.R.** responded that DEQ follows the Clean Air Act’s definition of emergency generators for sources in Oregon. Facilities with a stationary source permit from DEQ have a limited number of hours they can operate per year for testing and readiness and maintenance. DEQ does not currently regulate emergency hours.

Toxicity Reference Values

David Farrer, Oregon Health Authority (OHA), reminded the RAC members that toxicity reference values (TRVs) are health-based amounts of chemicals in the air that DEQ uses to evaluate risk to Oregon communities related to air pollution. TRVs are the basis for the Risk Based Concentrations (RBCs) that are used in the CAO program for regulatory purposes, and they are also the basis for ambient benchmark concentrations that are used more broadly in non-regulatory air toxics programs in the State. David also reminded the RAC members of the list of sources that DEQ considers to be authoritative in terms of their scientific rigor and comprehensive methods for producing TRV information. These authoritative sources are listed in rule and 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 the Air Toxics Science Advisory Committee (ATSAC). David also reminded the RAC members of the TRV-related materials that were provided, including the TRV proposed rule table and supplementary materials to help the RAC members understand how DEQ and OHA generated these TRV proposals. In addition, DEQ and OHA have also provided a letter to DEQ from Oregon Business & Industry (OBI), an accompanying technical memo from ToxStrategies containing technical feedback on some of the TRVs proposed to the RAC, and OHA’s written response to the ToxStrategies technical memo.

TRV Discussion

- **Deborah Proctor** commented that there are some chemicals that are high priorities for Oregon businesses that OHA in consultation with ATSAC should look into further. For some of these, ToxStrategies has proposed alternative values developed from newer studies with more robust risk assessment methods and including acute values that are consistent with DEQ's definition of acute.

These proposed alternative TRV values include the acute TRV for nickel, the acute TRV for lead, both the acute and chronic non-cancer TRVs for phosgene, and the TRVs for arsenic. In addition, there are other chemicals for which OHA in consultation with ATSAC, could make minor adjustments to the proposed TRVs to update them to be more consistent with EPA guidance. There are also a few TRVs that have been vetted by OHA in consultation with ATSAC that could benefit from more in-depth discussion and consideration of other authoritative sources, in particular, amorphous silica and Per- and polyfluoroalkyl substances (PFAS).

- **David Farrer** responded, noting that OHA has responded to many of ToxStrategies' chemical-specific concerns and comments in their written response to the ToxStrategies technical memo.
- **Crystal Weston** shared support for the ATSAC process and its findings because it brought in scientific experts with no conflict of interest to develop health protective values that are science-based. Crystal also commented that this rulemaking process has already been delayed and shared that she has a lot of faith in Oregon industry's ability to innovate and account for those health risks in their daily operations.
- **Deborah Proctor** shared that there are many cases in which more advanced scientific approaches are available to develop health protective values. Many of the TRVs are adopted from dated sources. In other cases, there are better scientific methods to calculate a 24-hour acute value, since most of the authoritative sources do not use the same time period for acute values. This process could be similar to what was done for the manganese TRV in which the ATSAC reviewed a proposal.
- **David Farrer** responded to clarify for the RAC members that for DEQ rules, the target time period to protect for an acute TRV is a 24-hour period. When toxicological studies are done, it is not common for experiments to be done in a 24-hour period. Therefore, agencies using this information to develop standards must extrapolate from the research setting, which includes some amount of uncertainty.
- **Deborah Proctor** shared an example of the acute TRV for nickel which is based on ATSDR's value; however, ATSDR has since withdrawn the toxicological profile used to develop that TRV to check the calculations. There is one high-quality study, Buxton et al. 2021, that did test for 24-hour exposures to nickel for an endpoint of immune toxicity. Therefore, this study contains all of the information that is needed to develop a current 24-hour toxicity criteria, which is a preferable approach given the added uncertainty of ATSDR having withdrawn their acute value.[1]
- **Geoff Tichenor** shared an appreciation for the work that has been done to date by OHA and the ATSAC to develop the updated TRVs. Geoff commented that the regulated community would like to see a more careful, thoughtful evaluation and review of the science behind certain proposed TRVs for priority chemicals, which have the greatest concern from an implementability standpoint. For these chemicals that are most important to industry and most challenging to innovate around, Geoff encouraged OHA in consultation with ATSAC to serve as the authoritative source and to consider and evaluate all the best available science and be as thoughtful as possible.
- **Mary Peveto** commented that this approach for the CAO program and the ATSAC process was designed to incorporate the newest and best available science to establish the TRVs in a timely and systematic way. Mary expressed frustration at the delay in the timing of the process, noting that the DPM standard has not yet been addressed despite over 15 years of solid evidence behind it. Mary noted that the ATSAC was well-received as a scientifically valid process, and that there will be opportunities in the future to incorporate new information and emerging science, and that this should happen on a timely basis.
- **Molly Kile** noted that the body of literature around DPM, including the development of a NIST standard to be able to measure it, has been around for a sufficient period of time and that it should be considered.
- **Deborah Proctor** commented that a very large number of new TRVs were released, and the ATSAC reviewed them, but that this RAC process is the first opportunity for the scientific community and stakeholders in Oregon to provide input on the proposed values. Deborah also pointed out that these TRVs are unlike guidance values such as those developed by ATSDR because they are inflexible standards that are set in rule. Deborah agreed with Mary and Molly regarding DPM.

[1] OHA response to the ToxStrategies memo related to Nickel is on page 36 of the OHA written response: https://ormswd2.synergydcs.com/ORMSCMSearchDEQ/Search/RecordViewer.aspx?uri=7055506.

- **Crystal Weston** commented that the proposed TRVs were developed by scientific experts with no conflict of interest, and that it is important to be careful about risk assessments from a health standpoint.
- **Beth Ryder** noted that while the data associated with DPM is very mature, diesel engines are different now than when those studies were conducted and that conservatism is built into the proposed standards. It will be important during the implementation phase to consider how the DPM standard would be applied in Oregon, measuring the emissions as part of Oregon Method 5, would be different from how the standard is applied in California.
- **Travis Quarles** commented that the ATSAC was a valuable process; however, it was not a public process, and that it is worthwhile to further investigate certain chemicals.
- **Molly Kile** noted that the reason NIST-certified standards are important are that standardized analytical chemistry has been used to develop the risk assessment that is concentration-based and grounded in health effects. The fact that diesel engines have improved over time is not relevant to the TRV concentration.
- **Deborah Proctor** commented that in California, all of the constituents of the emissions from DPM are quantified based on the emissions from the engine, and polycyclic aromatic hydrocarbons (PAHs) that are within the DPM are not added to that. Either the inhalation unit risk TRV for DPM should be used or the individual chemical components that make up DPM but not both, because that would be double-counting.
- **Molly Kile** responded that if the NIST standard is used for DPM, then the individual constituents do not need to be included, and that would be a reasonable scientific approach. The only caveat to that is if there is a stationary source in Oregon with a specific PAH constituent, and there would need to be an inventory to account for that.
- **Beth Ryder** agreed with Deborah and Molly's statements and requested that DEQ consider this approach since the current methodology is inconsistent with that and that the current approach for estimating emissions from diesel generators is prescriptive and provides additional conservatism and additional pollutants that are included in the estimation of diesel risk.
- **Crystal Weston** responded that while it is appropriate to avoid double-counting, there should be caution around not considering individual TRVs for DPM, particularly if one of the component TRVs is more protective than DPM as a whole. Additionally, if there are multiple stationary sources in a row, those risks are not considered together.
- **Deborah Proctor** shared input on the acute TRV for lead. Currently, the TRV is based on the EPA National Ambient Air Quality Standard (NAAQS), which is a three-month rolling average value, and this is equal to the 24-hour value. ToxStrategies used EPA's All Ages Lead Model (AALM) that was released in 2025 and presented their innovative approach using this model at the Society of Toxicology conference as well as presented and received feedback on this approach from the Technical Working Group of the EPA that developed this model. There is an opportunity for OHA in consultation with the ATSAC to vet and utilize this possible approach to develop a 24-hour value that is health protective using the latest science.[2]
- **Travis Quarles** requested that DEQ confirm and clarify whether refractory ceramic fibers on the Priority List are kaolin-based, since it is not defined.
- **Deborah Proctor** commented on the phosgene TRV. The toxicity data for phosgene has evolved substantially since the standards were set by EPA and the California Office of Environmental Health Hazard Assessment (OEHHA). There is an opportunity for DEQ in consultation with the ATSAC to determine whether or not this new research literature available could provide a better basis for the phosgene TRV.[3]
- **Deborah Proctor** commented on the amorphous silica TRV. Amorphous silica is used in a large number of applications and there are many forms of it. ATSDR, EPA, and OEHHA have not set standards for amorphous silica. The Texas Commission on Environmental Quality (TCEQ) set a

[2] OHA's written response to ToxStrategies feedback on the acute TRV for lead is on page 33 of this document: https://ormswd2.synergydcs.com/ORMSCMSearchDEQ/Search/RecordViewer.aspx?uri=7055506.

[3] ToxStrategies feedback on phosgene was not part of the October 14, 2025 technical memo, and so is not covered in OHA's written response. ToxStrategies written comments on phosgene was in their later March memo posted here: https://www.oregon.gov/deq/rulemaking/Pages/caotrv2026.aspx.

standard and conducted an analysis in 2013. ATSDR wrote an extensive review of this analysis in 2019, and concluded that the science was not sufficient to set a standard. Deborah requested that ATSAC conduct additional review of these resources and that OHA and DEQ consider withdrawing the amorphous silica TRV based on ATSDR's conclusions as an authoritative source.[4]

- **Deborah Proctor** commented on the PFAS TRV. The science on PFAS is evolving rapidly, but none of DEQ's authoritative sources have set inhalation unit risk values for PFAS, and the route-to-route extrapolation, which was agreed to by the ATSAC, has some limitations due to the way these compounds bioaccumulate in the body. Deborah recommended that DEQ and OHA wait until the outside authoritative sources including EPA, which have spent significant time and resources studying PFAS, set inhalation values for these compounds.[5]
- **Crystal Weston** noted that with regard to amorphous silica, manufactured countertops are a known hazard in occupational health. Crystal also commented that regarding the actions that EPA has taken regarding PFAS, PFOS and PFOA are not short-chain PFAS compounds, which means that the EPA has not yet set regulations on the short-chain subclass of PFAS, which are what would most likely cause exposure via inhalation. Crystal noted that one of the strengths of the CAO program is that Oregon can decide to move forward on actions to protect public health independent of the federal government.
- **Geoff Tichenor** noted that OHA concluded (consistent with OEHHA and CalEPA) that trivalent chromium and cobalt alloys should not be applicable to trivalent chromium and cobalt TRVs. Geoff requested that OHA in consultation with ATSAC evaluate whether it is appropriate to extend the alloy exemption to other inorganic or metalloid elements commonly in alloys, with the strongest evidence being for nickel. Geoff also commented regarding PFAS that it would be appropriate for Oregon to wait until the authoritative sources develop an inhalation unit risk value before setting a value. There is also a concern regarding implementability, since there is also not yet a federally approved test method to measure air concentrations of PFAS.
- **Mary Peveto** commented that there seems to be an inconsistency in when emerging science is requested to be applied to setting TRVs, and that the ATSAC appropriately incorporated scientific understanding around PFAS and that there is clear and compelling evidence to prevent harm from PFAS, which are forever chemicals.
- **Beth Ryder** asked whether the NIST standard for DPM could be shared.
- **Deborah Proctor** clarified that there are two forms of silica, amorphous and crystalline silica. Crystalline silica, or quartz, is a major health hazard; amorphous silica is the far less toxic form. Deborah also agreed with Geoff's comment that consistent with cobalt and trivalent chromium, nickeline alloys should be considered exempt from the nickel TRVs and provided additional comments that in the alloy form, ions cannot dissolve in biological fluids and therefore cannot be absorbed in the body. Deborah also clarified that EPA has developed reference doses for the smaller chain PFAS compounds, including GenX, and that those values are being used as part of the CAO program. However, most of these inhalation values are not based on inhalation data, and it is difficult to go from an oral value to an inhalation value for many of these compounds with a strong scientific basis.[6]
- **Crystal Weston** commented regarding PFAS that extrapolating inhalation risk from oral toxicity is likely to be conservative since for most chemicals, inhalation exposure is more harmful than oral exposure. Cystal also asked to confirm if the risk assessment for PFAS includes exposures from soil or ingestion downstream, such as when PFAS deposits onto soil or crops.
- **Mike Poulsen, Oregon Department of Environmental Quality (DEQ),** responded that the TRVs are for inhalation only, and the RBCs for some chemicals (less volatile and heavier chemicals such as metals that can get deposited in the soil), there are multi-pathway adjustments that include contact with soil, dermal contact, incidental ingestion, and uptake into plants. PFAS are included with these multi-pathway adjustments.

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[4] OHA's response to ToxStrategies comments on amorphous silica start on page 12 of OHA's response document: https://ormswd2.synergydcs.com/ORMSCMSearchDEQ/Search/RecordViewer.aspx?uri=7055506.

[5] OHA's response to ToxStrategies comments on PFAS start on page 38 of the OHA's response document: https://ormswd2.synergydcs.com/ORMSCMSearchDEQ/Search/RecordViewer.aspx?uri=7055506.

[6] OHA's response to ToxStrategies comments on trivalent chromium start on page 18 of the OHA response document: https://ormswd2.synergydcs.com/ORMSCMSearchDEQ/Search/RecordViewer.aspx?uri=7055506.

- **Deborah Proctor** commented on hydrogen chloride. Since the non-cancer chronic TRV for hydrogen chloride was set, EPA has updated its regional gas dose ratio, which is the factor that allows for extrapolation between species, in 2012. Deborah recommended that DEQ and OHA consider incorporating this updated guidance from EPA. Deborah also commented that this new guidance could be applied to naphthalene. Deborah also shared that regarding PFAS, the models assume 100% absorption by oral or inhalation exposure, so it is not necessarily a conservative value to extrapolate from oral to inhalation exposure. Once PFAS is in the body, it accumulates, and the accumulated mass drives the health effects.[7] [8]
- **Geoff Tichenor** noted that Oregon rule requires the TRVs to be updated on a triennial basis and for them to be revised "as appropriate," which gives significant discretion to the agencies. Geoff commented that DEQ in consultation with ATSAC should be paying closest attention to where there are TRVs in which burdens on the regulated community could be avoided by incorporating current science, and that setting TRVs should include considerations of whether and how they be administered effectively. For PFAS specifically, Geoff cautioned against requiring the regulated community to measure for those pollutants using methods that have not yet been approved.
- **Crystal Weston** commented that for chronic PFAS, the effects of inhaling PFAS is likely roughly similar to ingesting it, so the proposed TRVs for PFAS are probably accurate. Crystal also commented that for naphthalene and particularly for methyl naphthalene, ATSDR developed their value in 2025 with knowledge of EPA's dosimetric adjustment guidance from both 2012 and 1994 and still chose to follow the 1994 guidance. OHA's recommended approach is consistent with ATSDR as an authoritative source.
- **Deborah Proctor** commented that the use of ATSDR's intermediate values to set acute TRVs should be reexamined. In particular, there are some health effects that occur from insoluble particle loading to the lungs, such as trivalent chromium. However, there would not be particle-loading health effects to the lung from an exposure period of 24 hours. Deborah recommended that OHA consider whether or not the health effect, in this case of particle overload, would occur from a short-term exposure as part of their review process.[9]
- **Crystal Weston** noted that regarding insoluble particle loading in the lungs, using an ingestion exposure route to approximate an inhalation exposure is probably conservative for PFAS exposures because PFAS is lipophilic.
- **Geoff Tichenor** thanked OHA for carefully reviewing the information presented by OBI through ToxStrategies. Geoff recommended that DEQ direct OHA and ATSAC to double-check the entire proposed TRV list one more time.
- **Crystal Weston** thanked the group for the discussion and the work that went into this process.

Public Input

Ben invited members of the public to provide comments.

No members of the public provided comments.

Conclude Meeting #2

JR thanked the RAC members for the discussion and input, and reminded the RAC members to submit new information or information for DEQ and OHA to consider in more detail in writing for consideration as RAC comments and input. **Ali** thanked the RAC members for their input and engagement. **Ben** thanked everyone for participating and adjourned the meeting.

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[7] OHA's response to ToxStrategies comments on hydrogen chloride start on page 30 of OHA's written response: https://ormswd2.synergydcs.com/ORMSCMSearchDEQ/Search/RecordViewer.aspx?uri=7055506.

[8] OHA's response to ToxStrategies comments on naphthalene are on page 35 of OHA's response document: https://ormswd2.synergydcs.com/ORMSCMSearchDEQ/Search/RecordViewer.aspx?uri=7055506.

[9] OHA's proposed policy on selection criteria for acute TRVs (referencing ATSDR intermediate values) are on page 32 of the TRV Support Document: https://ormswd2.synergydcs.com/ORMSCMSearchDEQ/Search/SearchDetail.aspx?uri=7004764.

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