

Submitter: Ryan Ramage
On Behalf Of: Valley Environmental LLC
Committee: House Committee On Climate, Energy, and Environment
Measure: HB3229

Good morning and thank you for your time. My name is Ryan Ramage and my company is Valley Environmental LLC which is one of the first and only permitted owners of a mobile ACB (Air Curtain Burner) in Oregon. One of the reasons why I am one of the first is because of Oregon's very expensive permits and extensive guidelines. I started this company knowing fees were going to be high, but in the last 3 years there have been added permit fees and increases because of rule changes when I have been told that Oregon is working on lowering fees by changing permit guidelines. The only reason my Air Curtain Burner needs a Title V is because Oregon does not identify it as what it is because of old ruling, so it is put in the incinerator category. Air Curtain Burners have been an effective tool in the US for many years in multiple states to fight excessive vegetation biomass issues, diseased vegetation, and invasive species while cutting down emissions and offering an option to produce a sterile soil amendment biochar or ash. The use of this technology is proven to improve cleaner air and help offer effective solutions to fight environmental issues such as climate change. The alternative options/ practices are open slash pile burning or chipping which are not as heavily regulated and contribute more pollution and negative impact to our environment and communities.

I do know that DEQ is still working on changing rules, but with an unknown timeline and constant fee increases it is making it very difficult to grow in business. I have spent over \$30,000 dollars in air permits the last 3 years and to have a drastic increase in my title V permit when my business and practices are a proven source to cut emissions, makes me question staying in business. I know of other companies in other states using the same equipment with lower fees and their businesses are growing while I keep getting clogged up with more rules and expensive fees. As a small business owner this is very frustrating when I could be taking that money and growing, which would in return would be an environmental improvement for our state and community. It is also frustrating to be on a job using my ACB(Air Curtain Burner) with very minimal emissions output and seeing a neighboring property in the distance open burning the same source of debris and smoking out an entire valley or area and here I am paying very high permit fees for improved air quality in Oregon.

If rules can be changed so quickly for increases and tighter regulations, why can't they be looked at and reworded for actual environmental improvements and improved technologies. I would love to be investing in more equipment and improvements for our state, but with the constant increases like HB3229 I am questioning the benefits and reasoning of even staying in business. I believe an increase like this will hurt many other companies as well. I understand increases are

necessary, but an 83% increase is too much and I feel like the state is penalizing my company for making improvements and investing in better environmental qualities. I am opposing HB3229 as it will be a great financial hit to my company and environmental improvements to Oregon. I am also asking for my ACB (Air Curtain Burner) to be looked at for reclassification in Oregon. For reference my specific machine is an Air Burners T24 Burn Boss.

As a pioneer of an industry in the PNW that makes proven environmental impacts I am excited to work and grow with our state/federal agencies and communities to improve our carbon footprint, air quality, and overall environmental impact for our future. However because our laws/policies as well as equipment classifications are out of date and not modernized with the current available technologies it makes it very difficult to grow my business and industry. The current fees, rules, and increases are unmanageable for growth, improved environmental impact and carbon reduction.

Ryan Ramage- Owner
Valley Environmental LLC