

TO: House Committee On Climate, Energy, and Environment

SUBJECT: HB 2738

Dear Members,

The Kenton Homeowners Association is once again attempting to shut down Portland International Raceway. Their first attempt was based upon the amount of noise they claimed could be heard during PIR automotive events. Testing and continual monitoring (at every road racing event) proves that the vast majority of the “noise” is equivalent to the decibel level of common conversation.

Their current claim is that the leaded racing fuel (required by some of the vintage cars) is creating a health issue within their community. But the scientific testing and data does not, by a huge margin, support this claim.

On Page 3 are tables showing testing and monitoring results of the Industrial Hygiene Assessment Report completed in 2017 by G2 Consultants, Inc. in Lake Oswego, Oregon. An important fact! The number of race cars participating in PIR events has declined sharply since 2017. Twenty-five years ago the largest event, The Rose Cup Races, attracted close to 400 race cars. Today typical car counts at events are around 100 to maybe 150 if we are lucky. In addition, there are fewer events now than in previous years. Points to consider:

1. The levels of lead exposure considered safe by various agencies are as follows:  
The Oregon Occupational Safety & Health Division regulatory Action Level (30ug/m<sup>3</sup>) and the Permissible Exposure Limit (50ug/m<sup>3</sup>). American Conference of Government Industrial Hygienists Threshold Limit Value (50ug/m<sup>3</sup>).
2. Table 1 lists the lead levels at various points at PIR during a SVRA Vintage Race event. The highest reading is 0.73 (ug/m<sup>3</sup>) at Pre-Grid. This lead level is 2.43% of the (30ug/m<sup>3</sup>) and 1.41% of the (50ug/m<sup>3</sup>) allowable levels.
3. Table 2 lists the lead levels at various points at PIR during a SCCA Track Night. This event allows legal street cars only, no true race cars. The highest reading is .097 (ug/m<sup>3</sup>) at the SW Grandstands. This lead level is 3.25% of the (30ug/m<sup>3</sup>) and 1.5% of the (50ug/m<sup>3</sup>) allowable level. It interesting to note that the SCCA event that allows only legal road cars produced a higher reading than the SVRA Vintage event.
4. September 2, 2022 Oregon DEQ and Oregon Health Authority responded to a Kenton Neighborhood Association concern that lead emissions from PIR were creating a health issue. I quote from the response by the Oregon agencies:  
**“However, DEQ’s air modeling and air monitoring done at PIR by G2 Consultants, and DEQ’S ambient air quality monitors all indicate that PIR is not having an impact on the ability to meet these standards (as set by the U.S. EPA) in north Portland. Further, “The results of this modeling showed that levels of lead reaching the community were below levels that would be expected to harm health..”**

5. Currently the EPA allows the use of leaded fuel for commercial and private aviation, race cars, marine engines, and farm equipment. With the exception of race cars, the other activities are year-round. Avgas, leaded aviation fuel, is the largest source of airborne lead emissions. Commercial and private jets use fuel that contributes 10% of U.S. Transportation emissions. Diesel Fuel emissions produce a long list of harmful chemicals and particulate. Diesel fuel accounts for approximately 9% of U.S. energy related CO2 emissions.

It is notable that there are many other activities that contribute to lead and other harmful emissions such as sporting events, recreational activities of all types, agricultural work, daily commuting, and all other transportation. These sources far surpass the ever decreasing lead levels at PIR.

Importantly, there is a serious financial impact if PIR closes. Without the vintage cars that require leaded fuel, the racing grids will become so small that that PIR will become insolvent. An estimated \$660,000 per year will be lost at PIR. Further, the sport supports numerous businesses, motels, eateries, automotive suppliers and shops, to name a few. Besides participating in racing myself, I also personally run a small Vintage Race Car Preparation shop. If PIR is closed, my business will close. There are many others in Portland that could suffer the same consequence.

In summary: There is not a lead health issue confronting Kenton. PIR will continue to be monitored by DEQ during race events. The financial impact to the community of closing PIR is significant. A few individuals that moved into the Kenton area, knowing that PIR was nearby and operational, would like to impose their preferences upon a sport that is enjoyed by a significant number of people, during a limited seasonal timeframe. This is simply KHA's latest unsubstantiated ruse for closing the track because they personally don't like it. Please consider the negative impact of closing PIR to the community of sport racing. I ask you to look at the scientific evidence and related financial impacts to the area and reject HB 2738.

Respectfully,

Brian Waters  
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Client: City of Portland - Portland Parks & Recreation  
 Project: Portland International Raceway - Industrial Hygiene Assessment  
 Site Location: 1940 North Victory Boulevard, Portland, Oregon

Table One  
 Air Monitoring Results for Lead - July 28, 2017

Sample Number	Sample Location	Sample Duration (Mins)	Concentration ( $\mu\text{g}/\text{m}^3$ )
072817-Pb1	PIR Office Roof Patio	441	0.64
072817-Pb2	Pre-Grid	412	0.73
072817-Pb3	Turn 11	400	<0.47
072817-Pb4	South Property Line	370	<0.51
072817-Pb5	Turn 7	349	<0.54
OR-OSHA PEL - 50 $\mu\text{g}/\text{m}^3$ OR-OSHA AL - 30 $\mu\text{g}/\text{m}^3$ ACGIH TLV - 50 $\mu\text{g}/\text{m}^3$			

$\mu\text{g}/\text{m}^3$  - micrograms per cubic meter  
 PEL - Permissible Exposure Limit  
 AL - Action Level  
 TLV - Threshold Limit Value  
 < - Less the laboratory's level of detection

Table Two  
 Air Monitoring Results for Lead - August 11, 2017

Sample Number	Sample Location	Sample Duration (Mins)	Concentration ( $\mu\text{g}/\text{m}^3$ )
081117-Pb1	PIR Office Roof Patio	270	0.41
081117-Pb2	Pre-Grid	215	0.22
081117-Pb3	Turn 11	199	<0.19
081117-Pb4	South Property Line	240	<0.16
081117-Pb5	SW Grandstands	239	0.97
OR-OSHA PEL - 50 $\mu\text{g}/\text{m}^3$ OR-OSHA AL - 30 $\mu\text{g}/\text{m}^3$ ACGIH TLV - 50 $\mu\text{g}/\text{m}^3$			

$\mu\text{g}/\text{m}^3$  - micrograms per cubic meter  
 PEL - Permissible Exposure Limit  
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Results of this industrial hygiene assessment are compared to regulated and recommended occupational standards established by the OR-OSHA and the ACGIH, which are based on 8-hour TWAs.

The scope of this assessment was to determine airborne lead concentrations at multiple areas during these two events. Additional personal monitoring would need to be performed to determine precise occupational lead exposures to PP&R employees. However, the OR-OSHA and ACGIH