

April 17, 2025

Senate Committee on Energy and Environment
Oregon State Legislature
900 Court St. NE,
Salem, OR 97301

RE: Testimony in Support for 2332

Chair Sollman and members of the Senate Committee on Energy and Environment,

The agencies represented at the bottom of this letter are writing to express support for House Bill 2332, which seeks to prohibit the Department of Environmental Quality (DEQ) from requiring a Title V operating permit for certain air curtain incinerators. This bill will unlock access to equipment that can help address the urgent need to manage tree infestations, such as those caused by the Emerald Ash Borer (EAB), in a timely and efficient manner.

While we support the need to regulate air quality and reduce emissions, especially in the metro region, Title V permits are typically reserved for large facilities with significant emissions, making the process burdensome and time-consuming for smaller operations like air curtain incinerators that burn only wood waste, clean lumber, or yard waste. Obtaining a Title V operating permit can be a complex and rigorous process that includes continuous monitoring and reporting because it is designed to ensure that large facilities comply with the Clean Air Act.

Beaverton, Hillsboro, Washington County, Clean Water Services, and Metro are currently investigating the feasibility of establishing an incinerator to manage trees infested with EABs or other pests. The EAB is a highly destructive pest that poses a severe threat to ash trees. Once infested, an ash tree can die within a few years, leading to the potential loss of entire tree canopies and species.

Given the deadly nature of EABs and the rapid spread of infestations, it is imperative to have efficient and effective means of disposing of infested trees. Air curtain incinerators provide a viable solution, but the requirement for a Title V operating permit creates unnecessary delays and obstacles. By exempting these incinerators from the Title V permit requirement, House Bill 2332 will enable quicker response times and better management of tree infestations, ultimately protecting our urban forests and ecosystems.

We ask that the committee support House Bill 2332 and help safeguard our tree canopy from the devastating impacts of pests like the Emerald Ash Borer.

Thank you for your consideration.

