From: Maggie Vandehey
To: MASON Palmer; OLIPHANT Margaret
Cc: VANDEHEY Maggie
Subject: SCHGEDULE and LRAPA update
Date: Tuesday, February 19, 2013 5:18:47 AM

Hi, I woke up with a fever.

Margaret, OK – here is what I know:

- DEQ can only Notice and File chapter 340 of the OARs with SOS – not LRAPA TITLES.
- LRAPA's notice seems to have confused what they noticed in 2008, 2010 and 2011 with what we are noticing for our division 200 (and other divisions) rules now.
- The redline versions of the four LRAPA rules had some text that indicated some were drafts. I captures an image of what confused me and asked Robbye to send the redline as adopted.
- EPA requires that we submit our notice 45 days before the first hearing.
    - EPA notice – Mar 1
    - Oregon Bulletin - Apr 1
    - Earliest hearing - Apr 15 (You could change this date to later in the month)
- EPA ***STRONGLY*** suggest not combining SIP submittals post-EQC action but I didn't see anything about notices. I think keeping them separate would be prudent.
- The approach I took is to limit the analysis in the Notice (Stmt of need, fiscal, land use, fed relationship, etc.) to our rules. Attachment C includes a 2- page review of LRAPA's process and analysis followed by the redline rules as adopted.
- I used the Notice-About the Proposal Notice and Attachment C to start developing LRAPA 2008 Open Burning and help us focus. Paul is looking at them. If I don't have an email from him already, I should have something by midweek. They are in the folder with the same name on Rule_Development. After we have an approved approach and template modifications, we can replicate them for the other three rules.
- I'm fairly certain that EQC will need to amend the rules in the order the LRAPA's Board of Directors adopted them.
- The most immediate need is to have the four reviewers markup all chapter 340 rules that EQC needs to amend to incorporate their respective LRAPA rules. After comparing the four redline version, someone and Paul, will need to decide on approach to any rules that overlap between the 2008, 2010 and 2011 LRAPA rules. (What I'm wondering is, does the 2010 redline accept the 2008 change; thereby, acting as if the EQC amended the 2008 redline?)
- I'll commit to moving the work I've done into the templates but the reviewers will need to be ready to fill in the missing information.

Have a fun-filled day.

Maggie

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