From: VICK Nicole R.
To: VANDEHEY Maggie
Subject: RE: RM-AQ LRAPA rules
Date: Thursday, November 15, 2012 10:38:12 AM

I'm on a break in between meetings – and I don't think later will be any better with my other meetings!

LRAPA's board adopts the rules before we propose them to the EQC. Please see below in yellow for the PM2.5/GHG one.

Thanks and sorry for the delay!

From: VANDEHEY Maggie
Sent: Thursday, November 15, 2012 10:26 AM
To: VICK Nicole R.
Subject: FW: RM-AQ LRAPA rules

Should I just go with what I have?

From: VANDEHEY Maggie
Sent: Wednesday, November 14, 2012 12:27 PM
To: VICK Nicole R.
Subject: RE: RM-AQ LRAPA rules

Howdy,

Would you develop the statements below exactly how you want them in the staff report? Please address your statement: However, LRAPA does have a NSR/PSD PM2.5/GHG rulemaking that should be here rather than this industrial permitting rulemaking.

Joint DEQ and Lane Regional Air Pollution Agency – new for 2013
The Lane Regional Air Protection Agency is a local municipality that regulates air quality in Lane County. The Air Quality division at DEQ is responsible for coordinating a joint rulemaking effort with LRAPA from development through Environment Quality Commission adoption and submission to the Environmental Protection Agency. Coordination includes reviewing LRAPA's rules for stringency, revising applicable OARs, ensuring federal and state public process requirements are followed and providing LRAPA the authority to hold a hearing on behalf of the EQC. The EQC in turn directs DEQ to submit adopted rules to the EPA as a revision to the Oregon Clean Air Act State Implementation Plan.

$PM_{2.5}$ and GHG – new for 2013
LRAPA's board adopted NSR/PSD PM2.5 & GHG program rules in 2011.

Industrial Permitting Programs 2008 – new to DEQ for 2013
LRAPA's board adopted industrial permitting program rules in 2008 to streamline the program.

Open Burning 2008 – new to DEQ for 2013
LRAPA's board adopted changes to their Open Burning program in 2008.

Industrial Permitting Programs 2010 – new to DEQ for 2013
LRAPA's board adopted industrial permitting program rules in 2010 that clarified the 2008 rules.

Thank you!

From: VICK Nicole R.
Sent: Wednesday, November 14, 2012 11:38 AM
To: VANDEHEY Maggie
Subject: RE: RM-AQ LRAPA rules

I think I don't understand? I have the changes on the Rule Resource drive. Is that what I should not do?

From: VANDEHEY Maggie
Sent: Wednesday, November 14, 2012 11:38 AM
To: VICK Nicole R.
Subject: RE: RM-AQ LRAPA rules

Nudge… How is this going?

From: VICK Nicole R.
Sent: Wednesday, November 14, 2012 7:14 AM
To: VANDEHEY Maggie
Subject: RE: RM-AQ LRAPA rules

Please see my answers below. Let me know if you have any other questions.

Should we be using SP or Rule Resources?

From: VANDEHEY Maggie
Sent: Tuesday, November 13, 2012 3:41 PM
To: VICK Nicole R.
Subject: RE: RM-AQ LRAPA rules

Howdy,

OK, I'm setting the stage for a potential consensus agenda item when we take these rules to the EQC. I plan to put these at the end of AQ's list. That is why I put AQ at the end of all DEQ rules. We need more information on why we title them 2008 and 2010. Please respond by email since some of you are using SP and others are using Rule_Resources.

Joint DEQ and Lane Regional Air Pollution Agency
The Lane Regional Air Protection Agency is a local municipality that regulates air quality in Lane County. The Air Quality division at DEQ is responsible for coordinating a joint

rulemaking effort with LRAPA from development through Environment Quality Commission adoption and submission to the Environmental Protection Agency. Coordination includes reviewing LRAPA's rules for stringency, revising applicable OARs, ensuring federal and state public process requirements are followed and providing LRAPA the authority to hold a hearing on behalf of the EQC. The EQC in turn directs DEQ to submit adopted rules to the EPA as a revision to the Oregon Clean Air Act State Implementation Plan.

$PM_{2.5}$ and GHG – new for 2013

LRAPA is proposing changes to their New Source Review/Prevention of Significant Deterioration and $PM_{2.5}$ and greenhouse gas programs.

Industrial Permitting Programs 2008 – new for 2013

LRAPA is proposing changes that streamline their industrial permitting programs. Why does it have 2008? This is a rulemaking that was adopted by LRAPA's board back in 2008 and LRAPA just didn't send the rulemaking package to DEQ to be presented to the EQC. Nor was it submitted to EPA as a revision to OR's SIP.

Open Burning 2008 – new for 2013

LRAPA is proposing changes to their Open Burning program. Why does it have 2008? This is a rulemaking that was adopted by LRAPA's board back in 2008 and LRAPA just didn't send the rulemaking package to DEQ to be presented to the EQC. Nor was it submitted to EPA as a revision to OR's SIP.

Industrial Permitting Programs 2008 – new for 2013

LRAPA is proposing changes that streamline their industrial permitting programs. Why does it have 2008? This is a duplicate from above. However, LRAPA does have a NSR/PSD PM2.5/GHG rulemaking that should be here rather than this industrial permitting rulemaking.

Industrial Permitting Programs 2010

LRAPA is proposing changes that follow up from the 2008 streamlining efforts. This leaves a lot of questions. It doesn't look like they have started 2008 streamling. Why is this a follow up? This is a rulemaking that was adopted by LRAPA's board back in 2010 and LRAPA just didn't send the rulemaking package to DEQ to be presented to the EQC. Nor was it submitted to EPA as a revision to OR's SIP. The reason for this rulemaking is a cleanup to their 2008 industrial rulemaking.

Thank you.

Maggie

From: VICK Nicole R.
Sent: Tuesday, November 13, 2012 3:02 PM
To: VANDEHEY Maggie
Subject: RE: RM-AQ LRAPA rules

Did you receive my email from this morning? Please see this link:

V:\Annual Rulemaking Plans\2013 DEQ Rulemaking Plan\Draft Plan\Rule%20Proposal%20DescriptionsAQ.docx

What do you think?

From: VANDEHEY Maggie
Sent: Tuesday, November 13, 2012 2:53 PM
To: VICK Nicole R.
Subject: RM-AQ LRAPA rules

Hi Nicole,

I need some better descriptions of the following rules. It needs to inform the EQC.

> **Infrastructure State Implementation Plan for NO_2, SO_2 and Lead** – new for 2013
> The proposed rules would update Oregon rules to incorporate changes to federal air quality health standards.

Have a lead-in paragraph for LRAPA.

> The Lane Regional Air Pollution Agency …. When the LRAPA board adopts rules under its titles, the EQC must adopt..
>
> > **LRAPA.PM2.5GHG** – new for 2013
> > This is a joint rulemaking between DEQ and LRAPA
> >
> > **Industrial Streamling – 2008 LRAPA adoption**
> > Reviewing LRAPA
> >
> > **Open Burning – 2008 LRAPA adoption**
> > Approve for stringency 2008 LRAPA
> >
> > **Industrial Streamling – 2010 LRAPA adoption**
> > Reviewing LRAPA

Regards,

Maggie Vandehey | Sr. Operations and Policy Analyst
Department of Environmental Quality | 34000
811 SW Sixth Ave., Portland,, OR 97204-1390 | vandehey.maggie@deq.state.or.us
(503.229-6878 | In OR: 800.452-4011 | 🖶 503.229.6730