



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
AIR, WASTE AND TOXICS

Oregon DEQ, Air Quality Division  
Attn: Jerry Ebersole  
811 SW 6th Ave  
Portland, OR 97204

Mr. Ebersole,

EPA Region 10 has reviewed the rulemaking draft documents that you provided to us on August 3, 2012. Based on current EPA policy and requirements, we would plan to propose approval of the revisions to Division 200, 210, 216, 228, 232 and 244 into the State Implementation Plan if the comments below are addressed and if submitted without other significant changes. EPA will make a final decision based on its' review of the complete SIP that is submitted following your public process and after consideration of any comments we receive as part of EPA's public process.

**Division 200**

**340-200-0020 - Definitions**

- p 19, (107)(c) Improper use of EPA in definition of principle executive officer. "EPA" should be removed and "the agency" should be reinserted. The example merges with the definition and inappropriately defines any principle executive officers as having responsibility over EPA.
- p 24, Note. The referenced publications should be made available from DEQ, not EPA. These are DEQ's rules and thus they are the responsible party for being able to provide any documents referenced. Additional instances of this error can be found at: p 35 340-216-0060, p 38 34-216-0064, p 39 340-216-0066. Please change the responsibility to DEQ for this and any additional references not cited.

**Division 228, 238 -** Note that the rule revisions proposed here are Federal Rules that do not need to be submitted for inclusion into the SIP. NSPS and NESHAPS do not need to be included in the SIP because they are already federally enforceable and for the most part are not related to maintaining the NAAQS.

Thank you for the opportunity and please take them into consideration for this rulemaking process. If you have any questions, please feel free to contact me via phone or email (206.553.6125, [Spenillo.justin@epa.gov](mailto:Spenillo.justin@epa.gov)).

Regards,

A handwritten signature in black ink, appearing to read "Justin A. Spenillo".

Justin A. Spenillo, Air Planner  
State and Tribal Air Program Unit