

Considerations

Update Oregon rules to address federal air quality regulations

Table of Content Overview

Executive summary

This is an overview of the Considerations section of this planning document as of April 2, 2012.

The proposed rules would adopt new and amended federal air quality regulations and related permit rules. This includes adopting new national standards for sources such as gold mine ore processing and production, boilers, and solid waste incinerators, as well as changes to the federal gasoline dispensing facility rules. The rulemaking proposal would also clarify when and if ACDP permits are required for sources subject to NSPS and NESHAP.

Schedule The rule design team plans to START RULEMAKING in the first quarter of 2012. The

planned EQC ACTION DATE is in the fourth quarter of 2012 and the estimated

EFFECTIVE date is the first quarter of 2013.

Compliance The proposed rules do not involve include new, expanded or reduced compliance

requirements. See section 8 below.

Penalties The proposed rules do not involve penalties. See section 8 below.

Requirements The proposed rules include a new, expanded or reduced regulatory program. See

section 8 below.

Permits. The proposed rules INCLUDE new or expanded 'Air quality' permit, license,

Certifications certification or registration requirements. See section 9 below.

Fees The proposed rules do not affect fees. See section 10 below.

Regulated party The proposed rules do not involve previously unregulated parties. See section 11.

Rule support Risks associated with support for the proposed rules

See section 12 below.

Risk rating low → high is medium within DEQ, medium for the private stakeholders and medium for public stakeholders.

Considerations

The team has and will continue to identify issues that relate to the rule proposal in the following areas:

1. Program

2. Technology

3. Timing

4. Policy

5. Environmental

6. Fiscal

7. Legal

8. Political

9. Implementation

Risk rating low → high

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Brainstorming

Complete the idea that this rule proposal would...

Action	Object	Driver
align	existing regulatory program	federal regulations
carry out	a commitment in PPA	EPA direction
improve	existing regulatory program	program business decision
expand	existing regulatory program	federal regulations
implement	existing regulatory program	federal regulations

Topic discussion

This rulemaking will address several objectives as listed above.

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1. Proposed rules basics

The proposed rules would adopt new and amended federal air quality regulations and related permit rules. This includes adopting new national standards for sources such as gold mine ore processing and production, boilers, and solid waste incinerators, as well as changes to the federal gasoline dispensing facility rules. The rulemaking proposal would also clarify when and if ACDP permits are required for sources subject to NSPS and NESHAP.



Topic discussion

December 2012 is the target date, but there is no set deadline for this rulemaking.

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2. What problem is DEQ trying to solve?

This rulemaking would address the following problems that relate to changes in federal air quality regulations:

- Management of DEQ workload;
- Regulatory burden on businesses;
- Changes to existing federal regulations;
- Adoption of new federal regulations; and
- Unclear rules.

3. How would the proposed rule solve the problem?

The proposed rule changes will update DEQ's rules to reflect new federal standards and also allow DEQ to: better manage workload; space out permitting; focus on federal standards with the greatest environmental benefit; decline to implement federal standards that are not substantive or that are better implemented by EPA on the federal level; and ensure that the adoption of the area source NESHAP for boilers will not result in any new permittees. The following summarizes the proposed changes.

Provide for Better Management of DEQ Workload

- Change applicable requirement definition to exclude, for Air Contaminant Discharge Permits
 only, the federal accidental release program, National Emission Standards for Hazardous Air
 Pollutants, and New Source Performance Standards not adopted by the EQC
- Require EQC adoption of NSPSs before affected facilities are required to obtain an ACDP permit
- Exempt boilers with less than 10 MMBTU per hour heat input and subject to an area source NESHAP from permitting

Reduce the Regulatory Burden on Business

Exempt from permitting:

- Facilities affected by a NESHAP or NSPS, but subject to only procedural requirements
- Chemical manufacturing facilities only subject to work practice standards
- Mobile equipment surface coating operations using less than 20 gallons of coating per year

Align Oregon Rules with Changes to Existing Federal Regulations

- Incorporate changes EPA made to the federal gasoline dispensing facility NESHAP
- Update the adoption by reference of previously adopted NESHAPs and NSPSs
- Adopt rules to implement new federal emission guidelines for commercial and industrial solid waste incinerators.

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Align Oregon Rules New Federal Regulations

- Adopt by reference:
 - New federal area source NESHAPs for gold mine ore processing and production, and boilers
 - o New federal major source NESHAP for boilers and process heaters
 - o New federal major source NESHAP for electric utility boilers
 - o New federal NSPS for sewage sludge incineration units
- Require auto body shops that receive a NESHAP exemption, but subsequently violate the
 terms of the exemption, to comply with the NESHAP and have a permit for three years before
 being re-exempted

Clarify and Cleanup Rules

- Clarify the permitting requirements for metal fabrication and finishing operations
- Remove redundant general permit fee class assignments for halogenated solvent cleaners
- Remove gasoline dispensing facility submerged requirement in OAR 340 Chapter 232
- Reassign crematories from fee class two to fee class one
- Remove the accidental release prevention rule.

These rule changes will further DEQ's strategic direction to protect Oregonian's from toxic pollutants by reducing toxic air pollution and risk to public health.

4. How will DEQ know the problem has been solved?

This rulemaking results in large part from updated federal regulations. This rulemaking will update DEQ rules to ensure compliance with our obligation, under the Performance Partnership Agreement and delegation approval, that Oregon regulations are up to date with respect to federal air quality NESHAP and NSPS regulations. The need to maintain Oregon rules is ongoing because requirements change regularly.

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5. What alternatives did DEQ consider?

Management of DEO Workload

DEQ considered retaining the definition of applicable requirement to include federal standards not adopted by the EQC. DEQ rejected this alternative because retaining the definition makes it difficult for DEQ to manage workload, does not allow DEQ to focus its resources on standards with the greatest environmental benefit, and requires DEQ implementation of standards that are not substantive or that are better implemented by EPA.

DEQ considered retaining the requirement that facilities affected by an NSPS obtain a standard ACDP permit, regardless of whether the EQC has adopted the NSPS. DEQ rejected this alternative because it is triggered before DEQ is able to consider and implement less expensive and burdensome implementation options.

DEQ considered requiring permits for all boilers subject to an area source NESHAP. DEQ rejected this alternative because these boilers are subject only to biennial tune-ups and DEQ already has the authority to register these small boilers.

Reduce the Regulatory Burden on Business

DEQ considered retaining the permitting requirement for facilities subject only to procedural requirements, chemical manufacturing facilities subject only to work practice standards, and mobile equipment surface coating operations using less than 20 gallons of coating per year. DEQ rejected this alternative because the permitting requirement places an excessive burden on these facilities for little to no environmental benefit.

Align Oregon Rules with Changes to Existing Federal Regulations and New Federal Regulations
DEQ considered not taking delegation for some federal standards. However, with the exception of
the federal standards regulating stationary internal combustion engines, DEQ rejected this alternative
because it would reduce compliance and assistance to Oregon sources. DEQ also considered making
state specific changes to some federal standards, but rejected this alternative because the federal rules
address Oregon's immediate concerns and consistency with the federal rules reduces cost and
complexity for affected sources.

DEQ considered not expanding Oregon's gasoline dispensing facility rules to also apply to facilities that dispense gasoline into "non-road vehicles" and "non-road engines". DEQ rejected this alternative because it does not align Oregon rules with EPA rules and would result in DEQ not receiving delegation of the federal rules.

DEQ considered allowing auto body shops that violate the terms of their NESHAP exemption to immediately reapply for a NESHAP exemption. DEQ rejected this alternative because it creates an unlevel playing field for those shops that meet the terms of their NESHAP exemption and shops that choose to comply with the NESHAP and obtain a permit.

Topic discussion

No additional discussion

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6. Out of the scope of this rulemaking.

Topic		Reasoning	
None			
Include description in:	Committee charter	Message Map	Proposal

7. If the EQC does not amend, adopt or repeal the proposed rules, DEQ risks:

Loss of delegation	Y	Delay in public health protection	Y
Failure to comply with CWA		Rules does not align with law	Y
Failure to comply with CAA	Y	Increased difficulty doing business	
Failure to keep commitment	Y	Loss of program funding	
Failure to respond to legislature		Noncompliance	Y
Science does not apply to Oregon		Unclear rules	Y
Loss of federal funding		Failure to address cost	
Loss of reputation		Imposes undue administrative burden	Y

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8. Compliance, regulatory programs and penalties

The proposed rules:

- o Include new, expanded or reduced compliance requirements.
- o Do not involve penalties.
- Include a new, expanded or reduced regulatory program.

		New	Expanded	Reduced
The proposed rules involve	Involved		Requiremen	ts
Compliance	Y	Y		
Penalties				
Regulatory program	Y		Y	

Topic discussion

No additional discussion		

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9. Permits, certifications, licenses, registrations

The proposed rules INCLUDE new or expanded 'Air quality' permit, license, certification or registration requirements.

Air quality		New Expanded Reduced Requirements		
Air quality	Involved			
Asbestos License				
Air Contaminant Discharge Permit	Y		Y	
Air Quality Registrations				
Open Burning Letter Permit				
Tanker Certification				
Ttle V permit				
Vehicle Emissions Certification				
NESHAP	Y		Y	
NSPS	Y		Y	
Add new or missing title here				

	cussion

10. Fees

The proposed rules do not affect fees.

Draft or review Proposal Fee

The proposed rules...

Do not affect fees	TRUE
Would establish new fees	
Would increase existing fees	
Would decrease existing fees	

The proposed fees...

Does not apply	TRUE
Require DAS approval	
Are exempt from DAS approval ORS 291.55(2)(d)	
Are exempt from DAS approval ORS 291.55(2)(m)	

Invoicing system

No invoicing system involved	HazWaste Invoicing	
Develop new	SWIFT	
Access database	TRAACS	TRUE
Access template	UST Invoice.new	
CHRIS	WQSIS	
Add missing option here	Add missing option here	

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There is an existing database and invoicing processes.

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11. Regulated party

Involved unregulated TRUE Business TRUE Manufacturing TRUE TRUE City/county/state TRUE TRUE Individuals Enter custom regulated party here Enter custom regulated party here

Previously

Topic discussion

12. Support for proposal

Group	Degree of support	Riskometer
EQC	somewhat supportive	1 2 3 6
EMT	unknown or neutral	1 2 3 4
other DEQ programs	unknown or neutral	1 2 3 4
program management	definitely supportive	6
regional staff	unknown or neutral	1 2 3 4
regulated community	unknown or neutral	1 2 3 4
business and industry	unknown or neutral	1 2 3 4
environmental groups	unknown or neutral	1 2 3 4
public	unknown or neutral	1 2 3 4
state legislators	unknown or neutral	1 2 3 4
federal environmental regulators	somewhat supportive	1 2 3 6
other state and federal agencies	unknown or neutral	1 2 3 4
tribal nations	does not apply	6
local governments	unknown or neutral	1 2 3 4
	Average	1 2 3 4 6

lopic discussion		
No additional discussion		
The diagram discussion		
Process improvement		

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Public involvement

"The Legislative Assembly finds and declares that it is the policy of this state that whenever possible the public be involved in the development of public policy by agencies and in the drafting of rules. The Legislative Assembly encourages agencies to seek public input to the maximum extent possible before giving notice of intent to adopt a rule. The agency may appoint an advisory committee that will represent the interests of persons likely to be affected by the rule, or use any other means of obtaining public views that will assist the agency in drafting the rule."

1. Advisory committee involvement

Guide

No plans to convene a committee	TRUE	Program	Environmental
Use a standing committee	-	Technology	Fiscal
Reconvene a committee		Timing	Legal
Convene a new committee	-	Policy	Political

Estimated number of meetings 0 Estimated days between meetings 0

Topic discussion

No additional discussion

2. Information meetings and hearings

ORS 183.333

Does not apply		Public notice without hearing	
Portland area information meeting	TRUE	Public notice with hearing	TRUE
Regional information meeting		Re-notice	
Estimate number of meetings	1	Estimate number of hearings	1

Topic discussion

Process improvement

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Considerations

1. Program considerations

Complexity rating	potential for minor complexity		1 2 3	6	
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Subject program

The adoption of the area source NESHAP for boilers and the expansion of the gasoline dispensing facility rules to facilities that dispense gasoline into non-road vehicles and non-road engines could result in a significant number of new permittees and invoices. To minimize the number of new permittees and invoices, this rulemaking will propose that the current permit threshold for boilers be extended to boilers affected by the NESHAP. In addition, the affected gasoline dispensing facilities aren't likely to have throughputs that would trigger permitting.

Other DEQ programs

Large numbers of businesses that dispense gasoline into non-road vehicles and non-road engines are potentially affected by the amended gasoline dispensing facility NESHAP. Many of these businesses have not previously been subject to air quality regulations. Initially, there may be compliance issues with these businesses, placing a burden on DEQ's Office of Compliance and Enforcement. Compliance rates should improve and therefore the burden on OCE should reduce over time.

Incorporating federal changes to the gasoline dispensing facility NESHAP will result in expansion to facilities that dispense gasoline into non-road vehicles and non-road engines. This will require the UST Program to incorporate the NESHAP requirements into additional inspections. DEQ is implementing the gasoline dispensing facility NESHAP in a joint effort of the Air Quality Division and the Underground Storage Tank Program. The UST program has incorporated the NESHAP requirements into their current inspection program. This leveraging of UST Program resources has allowed the Air Quality Division to reduce implementation costs and establish two lower cost General ACDP fee classes for gasoline dispensing facilities. The generated revenue pays for the NESHAP portion of the UST Program inspection. However, affected businesses aren't likely to have throughputs that would trigger control requirements or permitting. Therefore, the increase in workload on the UST Program is not expected to be significant. Revenue generated by permitting additional businesses will be used to pay for this increased workload.

Include description in:	Committee charter	Message Map	Υ	Proposal				
Topic discussion								
No additional discussion								
2. Technology consideration	2. Technology considerations							
	Complexity rating potentia	al for minor complexity		1 2 3 6				
Describe this consideration								
Existing UST and AQ databases will support implementation of this rulemaking.								
Include description in:	Committee charter	Message Map		Proposal				
Topic discussion								
No additional discussion								

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3. Timing considerations

Criticality rating	moderate criticality	1 2 3 4
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Describe this consideration

DEQ's 2010-2012 Performance Partnership Agreement with EPA stipulates that DEQ adopt NESHAPs and NSPSs and request delegation at least every two years.

States are required to submit a plan that meets the requirements of the amended emission guidelines for commercial and industrial solid waste incinerators by one year after promulgation of the emission guidelines. EPA expects to publish the amended emission guidelines in May of this year. Therefore, state plans will be due in May of 2013. If a state does not submit an approvable plan, EPA is required to develop a Federal plan for Commercial and Industrial Solid Waste Incinerators located in that state within 2 years after promulgation of the emission guidelines.

- Existing gold mine ore processing and production facilities are required to comply with the new NESHAP by February 17, 2014.
- Existing gasoline dispensing facilities that dispense gasoline into the fuel tank of "non-road vehicles" or "non-road engines" are required to comply with the amended gasoline dispensing facility NESHAP by January 24, 2014.
- Existing commercial, institutional, and industrial boilers are required to be tune-up by March 21, 2013.
- Owners of larger commercial, institutional, and industrial boilers are required to have an energy assessment performed by March 21, 2014.
- Existing coal- and oil-fired electric utility boilers are required to comply with the new utility NESHAP by April 16, 2015.

Rule changes are necessary now in order to delay implementation of the NESHAP and NSPS standards for stationary engines. Air Quality managers have decided to delay implementation of these standards because of potential workload increases. Air Quality managers want a comprehensive implementation plan and to know how many facilities would be affected before proceeding. Oregon's current rules require DEQ to implement federal standards for currently permitted facilities when they are adopted by EPA, not when they are adopted by the EQC. Oregon's rules also require facilities affected by new NSPSs to obtain a permit when an NSPS is adopted by EPA, not when it is adopted by the EQC.

On January 5, 2010, EPA promulgated the Prepared Feeds NESHAP. The NESHAP contained a requirement that facilities, with an average daily feed production level exceeding 50 tons per day, capture and route emissions to a cyclone designed to reduce particulate emissions by 95 percent. The compliance date for this requirement was January 5, 2012. On December 23, 2011, EPA promulgated amendments to the NESHAP that removed the 95 % control requirement for cyclones at existing facilities and retained the compliance date of January 5, 2012. This rulemaking would adopt the revised NESHAP. In the meantime, affected facilities are out of compliance with the version of the NESHAP previously adopted by the EQC. After the rules are adopted, DEQ will revise the prepared feed general ACDP and reassign affected facilities to the revised permit.

Include description in:	Committee charter	Message Map	Y	Proposal
Topic discussion				
No additional discussion				

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4. Policy considerations Complexity rating does not apply Describe this consideration Include description in: Committee charter Message Map Proposal Topic discussion 5. Environmental considerations unknown Complexity rating The proposed rule has no direct correlation to the environment. Describe this consideration EPA has identified gasoline dispensing facilities, gold mine ore processing and production operations, and boilers as emitters of one or more of the 33 hazardous air pollutants that pose the greatest risk to public health in urban areas. Many of these hazardous air pollutants are also of particular concern in Oregon. For instance, gasoline vapors contain benzene, a known cancer-causing chemical. Because benzene concentrations in many Oregon communities are significantly above levels protective of human health, reducing benzene is a priority for DEQ. Boilers and gold mine ore processing and production operations emit mercury which can impair neurological development and cause neurological damage, and is a toxic of concern in Oregon.

Message Map

Y Proposal

Committee charter

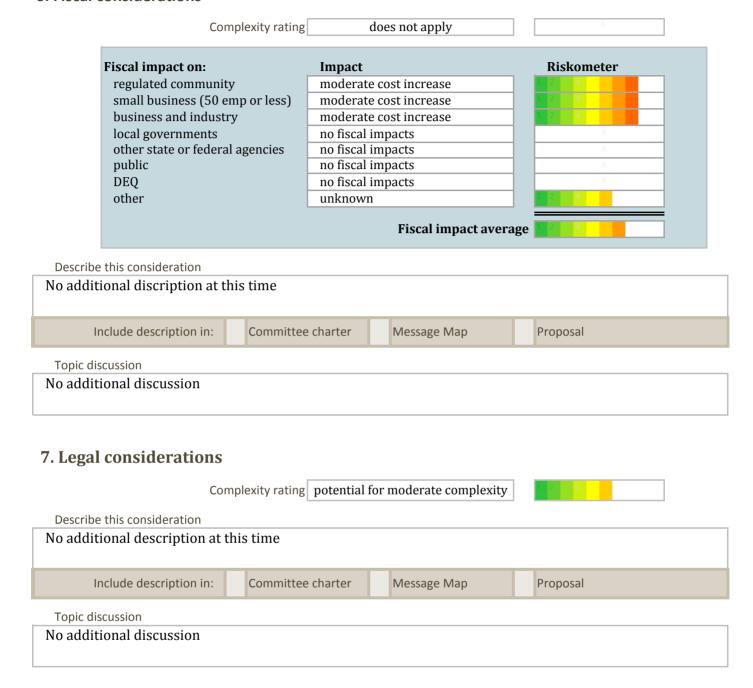
Include description in:

Topic discussion

No additional discussion

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6. Fiscal considerations



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8. Political considerations

Controversy rating potential for moderate controversy							
Describe this consideration							
Large numbers of businesses that dispense gasoline into non-road vehicles and non-road engines are potentially affected by the gasoline dispensing facility NESHAP. Many of these businesses have not previously been subject to air quality regulations, are opposed to permitting and fees, and may contact their legislators. However, these businesses aren't likely to have throughputs that would not trigger the more significant control requirements or permitting. In a 2009 mailing, DEQ informed businesses that dispense gasoline into non-road vehicles and non-road engines that they were exempt from the gasoline dispensing NESHAP, knowing that in the future it would likely have to inform these same businesses that they are subject to the NESHAP.							
Include description in:	Committee charter	Message Map	Proposal				
Topic discussion							
No additional discussion							
9. Implementation considerations Complexity rating potential for minor complexity Describe this consideration							
No additional description at t	No additional description at this time						
Include description in: Committee charter Message Map Proposal							
Topic discussion							
No additional discussion							
Process improvement							

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Monday, April 02, 2012

Resources

Update Oregon rules to address federal air quality regulations

Table of Content Overview

Project accounting and rulemaking record

The agency rules group has reserved the following for this proposal

Has reserved the following for this proposal: Time accounting code for work related to rulemaking #####: RM-NESHAP/NSPS Project number for expenditures related to this rulemaking P##### RM-NESHAP/NSPS RM-NESHAP/NSPS RM Identifier for email Subject line RM-NESHAP/NSPS@deq.state.or.us Rule design team email group Advisory Committee email group None Public comment email box Comment-NESHAP/NSPS@deq.start.or.us Electronic record RM-NESHAP/NSPSSharePoint RM-NESHAP/NSPSArchive Email folder RM-NESHAP/NSPS2012 Email archives RM-NESHAP/NSPS.pst Physical record Pre filing Post filing Central rulemaking cabinet for 5-years then SOS Archives

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Core team

Lead DA	Andy Ginsburg	=>20 <30 hours		
	The lead division administrator: • ensures the program manager and the team has adequate and appropriate resources • raises potential issues to the executive management team • advises the team on Considerations, Resources and Schedules as needed • reviews and approves the draft and final release of the Proposal at: - Presentation to EMT - Public notice			
Lead manager	Tom Roick	=>40 <80 hours		
	ensures the team has adeqraises potential issues to thereviews and advises the te	ing member on the rule design team who: quate and appropriate resources he lead division administrator eam on Considerations, Resources and Schedules draft and final release of the Proposal at: roval requests		
Project expert	Nicole Vick	=>30 <40 hours		
	The project lead is the expert on the rulemaking process and writing for the proposed rule. The project lead is responsible for: • Developing, maintaining and keeping the: • Blueprint and SharePoint site • Schedule • Engaging identified resources in collaboration activities • Writing all rulemaking materials using: • plain English • DEQ Style Guide • Ensuring the proposal has all required reviews and approvals before: • Releasing the blueprint beyond the rule design team • Publishing the proposal external to DEQ			
Subject expert	Jerry Ebersole	=>200 hours		
Process assistant	Carol Thornberg	=>2 <10 hours		
Handles meeting logistics including iLinc and conference call-in numbers. Mailings, G				
Facilitator		0 hours		
Rule contact	Jerry Ebersole	=>10 <20 hours		
	Address Jerry Ebersole 811 SW 6th Ave Portland, OR 97204-139	Phone (503) 229-6974		
	NESHAP Implementation Plan Team exists and will be used to support communication and implementation.			

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Section process improver	nent		
Advisors			
DOJ	Paul Logan	=>10 <20 hours	
	Makes sure all legal issues are adequately resolved, and the proposed rules are legally sufficient (within authority, consistent with statute, enforceable).		
ARC	Maggie Vandehey	=>10 <20 hours	
	Checks that the package	meets the procedural requirements and is satisfactory for notice and filing.	
SIP Coordinator	Nicole Vick	0 hours	
Section process improver	nent		
Interested sta	aff		
Enter custom name		0 hours	
Enter custom name		0 hours	
Enter custom name		0 hours	
Section process improver	nent		

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=>10 <20 hours **Eastern Mark Fisher** Reviews the permitting rules and rules that implement the federal emissions guidelines for rulemaking commercial and industrial solid waste incinerators. implementation =>10 <20 hours **Northwest** Johnny Baumgartner Reviews the gasoline dispensing rule amendments. rulemaking implementation **Steve Croucher** =>10 <20 hours Western Reviews the gasoline dispensing rule amendments. rulemaking implementation =>10 <20 hours **Land Quality Andree Pollock** Reviews the gasoline dispensing rule amendments. rulemaking implementation =>10 <20 hours **Air Quality** Rebecca Hillwig rulemaking Reviews rules for impacts on small businesses. implementation **Water Quality** Enter email 0 hours rulemaking implementation Section process improvement

(See sections below for the lab and MSD)

Regions and other divisions

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Financial ser	vices	The proposed rules involve financial services resources.
Budget	Robin Williams	=>10 <20 hours
	Review and approve stateme	nt of need and fiscal impact statement
Accounting	Richard Lawrence	>0 <2 hours
	_	fees and invoicing, would still like him to be aware of the rule changes. tem is involved with this rulemaking. Please consult with resource early in the rulemaking
Contracts	<u>Debra Owen</u>	0 hours
Section process improvem	ent	
Communicat	ions and Outreach	The proposed rules involve OCO resources.
		6 6 6 6 6 6 6
Edits	William Knight	=>2 <10 hours
Edits	William Knight Edit Proposal tab: • Notice sections and announce • All other sections before EQ	=>2 <10 hours cement before SOS release
Edits Messaging	Edit Proposal tab: • Notice sections and announce	=>2 <10 hours cement before SOS release
	Edit Proposal tab: • Notice sections and announc • All other sections before EQC William Knight	=>2 <10 hours cement before SOS release C release =>2 <10 hours on Considerations tab. Reviews Announcement tab and display ad
	Edit Proposal tab: • Notice sections and announc • All other sections before EQC William Knight Reviews messaging indicated	=>2 <10 hours cement before SOS release C release =>2 <10 hours on Considerations tab. Reviews Announcement tab and display ad
Messaging	Edit Proposal tab: • Notice sections and announc • All other sections before EQU William Knight Reviews messaging indicated section of MeetingMecanics tai William Knight	=>2 <10 hours cement before SOS release C release =>2 <10 hours on Considerations tab. Reviews Announcement tab and display ad b.
Messaging Media	Edit Proposal tab: • Notice sections and announc • All other sections before EQU William Knight Reviews messaging indicated section of MeetingMecanics tai William Knight	=>2 <10 hours cement before SOS release C release =>2 <10 hours on Considerations tab. Reviews Announcement tab and display ad b.

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Organization	services	The proposed rules do not involve organizational services.
Health and safety		0 hours
rulemaking implementatior		
Human resources		0 hours
rulemaking implementatior	1	
Policies and procedu	ires	0 hours
rulemaking implementatior	1	
Training	<u>Jill Corona</u>	0 hours
rulemaking implementatior		
Facilities		0 hours
rulemaking implementation		
Section process improvement	ent	
Technical ser	vices	The proposed rules do not involve technical services.
Divisional		0 hours
rulemaking implementatior		
IT	Rebecca Kirk	0 hours
rulemaking implementation	1	
	The team indicated an invoicing sysprocess.	stem is involved with this rulemaking. Please consult with resource early in the rulemaking
BSD	Sohng Shin	0 hours
rulemaking implementation		
	The team indicated an invoicing sysprocess.	stem is involved with this rulemaking. Please consult with resource early in the rulemaking
Section process improvement	ent	

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Comphance ai	ild Emorcement	The proposed rules would invo	The OCE resources.
OCE	Jenny Root	=>10 <20 hours	1 2
rulemaking implementation	Reviews proposed rules to e	ensure enforcement issue:	s are addressed.
Section process improvemen	nt		
Laboratory		The proposed rules do no	ot involve the laboratory.
Monitoring		0 hours	6
rulemaking implementation			
Analytical testing		0 hours	6
rulemaking implementation			
Quality assurance		0 hours	6
rulemaking implementation			
Intergovernme	ental	The proposed rules do not invo	olve intergovernmental entities.
Tribal nations		0 hours	6
rulemaking implementation			
EPA		0 hours	6
rulemaking implementation			
LRAPA		0 hours	6
rulemaking implementation			
Municipalities rulemaking		0 hours	
implementation			
Counties		0 hours	6
rulemaking implementation			
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Special districts		0 hours	6	
rulemaking				
implementation				
Other state agencies		0 hours	6	
rulemaking				
implementation				
Section process improvemen	nt			

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