

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 the date on the header to this section.

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 is medium within DEQ, medium for the private

stakeholders and medium for public stakeholders.

See section 12 below.

Considerations

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

Program
 Technology

1. Program

3. Timing

4. Policy

5. Environmental

6. Fiscal

7. Legal

8. Political

9. Implementation

Risk rating low → high

Risk rating low → high

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.

Scope

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.

2. What problem is DEQ trying to solve?

The clean air act requires EPA to establish NESHAPs for both major and area sources of hazardous air pollutants. EPA finished establishing major source standards in 2004, but is required to perform a residual risk analysis and periodic technology reviews. These reviews are ongoing and in some cases result in EPA making the standards more stringent. In addition, EPA began establishing area source standards in 2006 and concluded in 2011. DEQ is adopting the area source standards in five phases. The first three phases concluded in December 2008, December 2009, and February 2011. This rulemaking is phase four of five. DEQ adoption of new and amended NSPSs and NESHAPs is an ongoing process.

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 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.

Reduce Hazardous Air Pollutant Emissions

- 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.

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 Federal Regulations/Reduce Hazardous Air Pollutant Emissions
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.

		uss	

No additional discussion

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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	u	IJ	ic	u	15	L.	15	SI	U	1

No additional discussion

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		Requirements			
Compliance	Y	Y				
Penalties						
Regulatory program	Y		Y			

Topic discussion

No additional discussion

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
Air quality	Involved	F	ts	
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				

0	рι	С	d	IS	Cl	JS	SI	0	n

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	

Topic discussion

There is an existing database and invoicing processes.

11. Regulated party

Involved unregulated Business TRUE 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	somewhat supportive	1 2 3 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
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

Topic discussion		
No additional discussion		
Process improvement		
- resease improvement		

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

<u>Bold</u> topics are part of the advisory committee charter.

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

Considerations

1.	Program	consid	erations
_ •	I IOSI WII		CIGUIO

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 c	harter	Message Map	Υ	Proposal
Topic discussion					
No additional discussion					
	Ons Complexity rating	potential fo	or minor complexity		6
2. Technology consideration Describe this consideration		potential fo	or minor complexity		6
	Complexity rating	•		akir	ng.

Topic discussion

3. Timing considerations

moderate criticality	1 2 3 4
	moderate criticality

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.

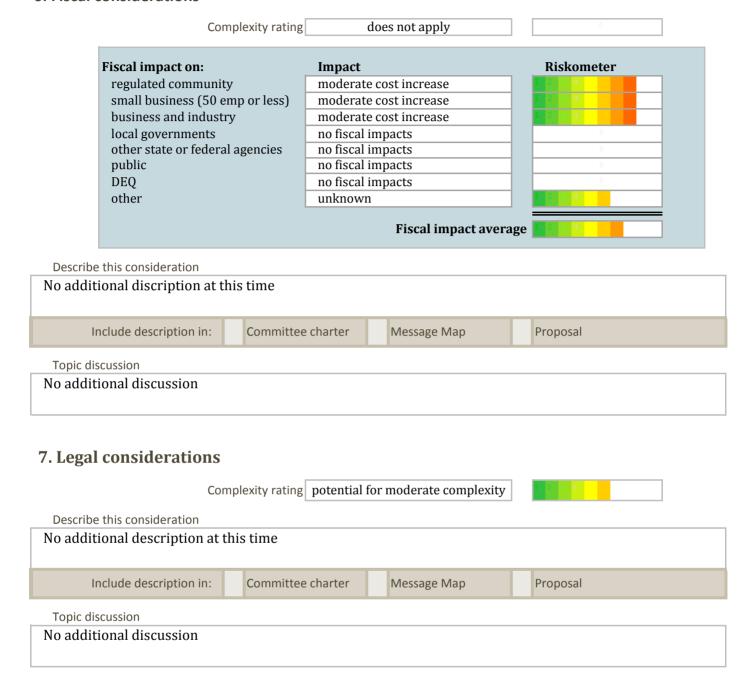
On January 5, 2010, EPA promulgated the Prepared Feeds NESHAP. The NESHAP contained a requirement that facilities, with an average daily feed production level exceeding 50 tons per day, capture and route emissions to a cyclone designed to reduce particulate emissions by 95 percent. The compliance date 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	Υ	Proposal
Topic discussion				
No additional discussion				

4. Policy considerations

Co	mplexity rating	does not apply	6			
Describe this consideration						
Include description in:	Committee charter	Message Map	Proposal			
Topic discussion						
5. Environmental consider	ations					
Co	mplexity rating	unknown	5			
The proposed rule	has no direct correlation	to the environment.				
Describe this consideration						
		•	and production operations, and			
health in urban areas.	more of the 33 nazardo	ous air pollutants that p	oose the greatest risk to public			
incardii iii di bali ai cas.						
_	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 sign	_		-			
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.						
Include description in:	Committee charter	Message Map	Y Proposal			
Topic discussion						
No additional discussion						

6. Fiscal considerations



8. Political considerations

Con	troversy rating potential f	or moderate controversy	1 2 3 4		
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		
		ıl for minor complexity	1 2 6		
Describe this consideration					
No additional description at	this time				
Include description in:	Committee charter	Message Map	Proposal		
Topic discussion					
No additional discussion					
Process improvement					

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 Project number for expenditures related to this rulemaking RM Identifier for email Subject line Rule design team email group Advisory Committee email group

Public comment email box Electronic record

> Email folder Email archives

Physical record Pre filing #####: RM-NESHAP/NSPS

P##### RM-NESHAP/NSPS

RM-NESHAP/NSPS

RM-NESHAP/NSPS@deq.state.or.us

None

Comment-NESHAP/NSPS@deq.start.or.us

RM-NESHAP/NSPSArchive RM-NESHAP/NSPS2012 RM-NESHAP/NSPS.pst

RM-NESHAP/NSPSSharePoint

Post filing Central rulemaking cabinet for 5-years then SOS Archives

Core team

Andy Ginsburg =>20 <30 hours Lead DA 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 The lead manager is a contributing member on the rule design team who: • ensures the team has adequate and appropriate resources • raises potential issues to the lead division administrator • reviews and advises the team on Considerations, Resources and Schedules • reviews and approves the draft and final release of the Proposal at: - fee notification or approval requests - Public notice - EQC Nicole Vick =>30 <40 hours **Project expert** 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 =>200 hours Subject expert Jerry Ebersole **Carol Thornberg** =>2 <10 hours **Process assistant** Handles meeting logistics including iLinc and conference call-in numbers. Mailings, GovDelivery **Facilitator** 0 hours =>10 <20 hours Rule contact Jerry Ebersole (503) 229-6974 Address | Jerry Ebersole Phone 811 SW 6th Ave Portland, OR 97204-1390 NESHAP Implementation Plan Team exists and will be used to support communication and

implementation.

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

Regions and other divisions (See sections below for the lab and MSD) =>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

Financial ser	rvices The proposed rules involve financi	ial services resources.	
Budget	Robin Williams =>10 <20 hours	6	
	Review and approve statement of need and fiscal impact sta	tement	
Accounting	Richard Lawrence >0 <2 hours	6	
	Though this does not involve fees and invoicing, would still I: The team indicated an invoicing system is involved with this ruleamking. Please process.		
Contracts	Debra Owen 0 hours	6	
Section process improvem	ment		
Communications and Outreach The proposed rules involve OCO resources.			
Communicat	tions and Outreach The proposed rules involve OCO re	esources.	
Communicat	tions and Outreach The proposed rules involve OCO re William Knight =>2 <10 hours	esources.	
		esources.	
	William Knight =>2 <10 hours Edit Proposal tab: • Notice sections and announcement before SOS release	esources.	
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Edits Messaging	William Knight =>2 <10 hours Edit Proposal tab: • Notice sections and announcement before SOS release • All other sections before EQC release William Knight =>2 <10 hours Reviews messaging indicated on Considerations tab. Reviews section of MeetingMecanics tab. William Knight =>2 <10 hours	6	
Edits Messaging Media	William Knight =>2 <10 hours Edit Proposal tab: • Notice sections and announcement before SOS release • All other sections before EQC release William Knight =>2 <10 hours Reviews messaging indicated on Considerations tab. Reviews section of MeetingMecanics tab. William Knight =>2 <10 hours	6	

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

Compliance and Enforcement	The proposed rules would involve OCE resources.
OCE <u>Jenny Root</u>	=>10 <20 hours
rulemaking Reviews proposed rule	es to ensure enforcement issues are addressed.
implementation	
Section process improvement	
Laboratory	The proposed rules do not involve the laboratory.
Monitoring	0 hours
rulemaking	
implementation	
Analytical testing	0 hours
rulemaking	
implementation	
Quality assurance	0 hours
rulemaking	
implementation	
Intergovernmental	The proposed rules do not involve intergovernmental entities.
Tribal nations	0 hours
rulemaking	
implementation	
EPA	0 hours
rulemaking	
implementation	
LRAPA	0 hours
rulemaking	
implementation	
Municipalities	0 hours
rulemaking	
implementation	
Counties	0 hours
rulemaking	
implementation	

Special districts	0 hours
rulemaking	
implementation	
Other state agencies	0 hours
rulemaking	
implementation	
Section process improvement	