From:	Max Hueftle
To:	Comment-SIP.SO2.NO2.Lead
Cc:	HOUGH Merlyn; Robbye Lanier
Subject:	SIP SO2 NO2 and Pb RM Comment from LRAPA
Date:	Wednesday, August 14, 2013 9:21:14 AM

To Whom it May Concern:

LRAPA believes it would be beneficial for EPA, DEQ and LRAPA if DEQ were to include the following authority by reference for the provisions of this rulemaking:

Subject to the requirements in this division and ORS 468A.100 through 468A.180, the Lane Regional Air Protection Agency is designated by the Environmental Quality Commission as the Agency to implement this division within its area of jurisdiction. The requirements and procedures contained in this division must be used by the Regional Agency to implement this division unless the Regional Agency adopts superseding rules that are at least as restrictive as this division.

The two areas of suggested revision are:

1. LRAPA suggests the above or similar provision be added as a new section to division 202 (e.g., OAR 340-202-0020).
2. For purposes of the division 200 changes, the above provision could replace the existing language in OAR 340-200-0010(3), or added specifically to the OAR 340-200-0020 Table 1; LRAPA prefers the former.

These suggested revisions would allow LRAPA to adopt these changes verbatim at the LRAPA board level and potentially eliminate the need for the EQC to adopt a similar LRAPA rulemaking for EPA approval. Thank you for your consideration of this matter.

Sincerely,

Max Hueftle

Max Hueftle, P.E.
Permit Section Manager
Lane Regional Air Protection Agency
541-736-1056, x. 231
e-mail: max@lrapa.org
www.lrapa.org