From: CURTIS Andrea
To: GARRAHAN Paul
Subject: RE: EQC approval of LRAPA rules - 2008 Industrial Streamlining
Date: Wednesday, June 26, 2013 1:22:01 PM
Attachments: 2008_LRAPA.Permit.Streamlining.Rulemaking.For.Review.pdf

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Paul,

I combined LRAPA documents for the 2008 Permit Streamlining rulemaking into a single PDF, attached. Let me know if you need more information to determine whether DEQ needs to re-notice the rulemaking.

Summary:

- Rulemaking and Hearing Notice:
  - 2008-07-23 Notice published in Register Guard. *I'm getting confirmation from LRAPA on whether notice was published in other newspapers.*
  - *I'm getting confirmation from LRAPA on notice issued to interested parties, including who, the date of notification, and the specific document people were provided*
- 2008-08-01 SOS Bulletin includes 340-200-0040
- 2008-08-27 Notice issued that LRAPA extended the comment deadline from 2008-09-02 to 2008-09-30. *I'm getting confirmation from LRAPA on who notice was issued to.*
- 2008-08-26 and 2008-09-09 Public hearings
- 2008-10-14 Adoption by LRAPA board

Andrea Curtis
Oregon Department of Environmental Quality
Air Quality Division
503-229-5946
curtis.andrea@deq.state.or.us

From: GINSBURG Andy
Sent: Thursday, June 13, 2013 12:26 PM
To: OLIPHANT Margaret; CURTIS Andrea
Subject: FW: EQC approval of LRAPA rules

Can you get this info to Paul?

Thanks.

Andy Ginsburg
Air Quality Administrator
Oregon Department of Environmental Quality
(503) 229-5397 - Office
(503) 572-7195 - Mobile

From: Garrahan Paul [mailto:Paul.Garrahan@doj.state.or.us]
Sent: Thursday, June 13, 2013 9:59 AM

To: GINSBURG Andy
Subject: EQC approval of LRAPA rules

Andy: To ensure that I provide thorough advice, could you ask your staff to send me all of the relevant LRAPA rulemaking documents used to approve the four rules that the EQC must now approve and submit to EPA for incorporation into the SIP? It would be helpful to have the rulemaking and hearing notices, including the FIS and other related documents.

It would also be helpful, for my comparison, to get the same set of documents for last year's approval of the Oakridge PM 2.5 plan approval, including both LRAPA's rulemaking documents and those DEQ used to approve that plan.

I want to include an assessment of whether differences in the processes, if any, might present any legal risks. And also try to figure out how to align the process for the four rulemakings that the EQC needs to approve with the process that worked fairly well for the Oakridge approval.

Thanks.

Paul Garrahan
Assistant Attorney-in-Charge, Natural Resources Section
Oregon Department of Justice
971-673-1943 (Portland Office; T, Th & F)
503-947-4593 (Salem Office; M & W)

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