From: GARTENBAUM Andrea
To: "Goldlust, Amy"
Subject: RE: Incorporation of LRAPA rules into the State Implementation Plan
Date: Wednesday, January 08, 2014 1:33:14 PM

Amy,

I can confirm that DEQ's current rulemaking activity to incorporate Lane Regional Air Protection Agency rules into the Oregon State Implementation Plan will not create any changes for businesses operating in Oregon or pharmaceutical manufacturers. DEQ has three LRAPA rulemakings: one is for LRAPA's open burning program and two are for LRAPA's permitting programs. If adopted, DEQ's rulemaking would add LRAPA's existing requirements to the state plan for protecting air quality. The proposals do not create different requirements for facilities. The proposals would add LRAPA's **existing** regulations into the State Implementation Plan. Let me know if this doesn't answer your question.

Thanks,

Andrea Gartenbaum
(formerly Andrea Curtis)
Air Quality Division - Rules Coordinator
Oregon Department of Environmental Quality
503-229-5946
gartenbaum.andrea@deq.state.or.us

From: Goldlust, Amy [mailto:amg@stateside.com]
Sent: Tuesday, January 07, 2014 3:01 PM
To: GARTENBAUM Andrea
Subject: Incorporation of LRAPA rules into the State Implementation Plan

Dear Ms. Gartenbaum,

My name is Amy Goldlust and I am regulatory counsel at Stateside Associates. As counsel, I monitor regulatory developments and rulemakings that are important to my clients, who wish to remain compliant and engage when appropriate.

A client of mine recently came across the DEQs proposed rules to incorporate Lane Regional Air Protection Agency (LRAPA) rules into the Oregon State Implementation Plan. Can you confirm that this rule, if implemented, will not have any effect on businesses operating in Oregon or pharmaceutical manufacturers, and therefore only effect residential open burning? Any information would be greatly appreciated. I look forward to hearing from you.

Thank you kindly,

Amy M. Goldlust
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