From: Max Hueftle
To: CURTIS Andrea; Robbye Lanier
Cc: OLIPHANT Margaret
Subject: RE: Templates for Rulemaking - DEQ Examples?
Date: Thursday, July 25, 2013 11:04:40 AM

Andrea,

I'm trying not to but I'm feeling a bit overwhelmed by the DEQ request for LRAPA to fit our historical rulemaking documents into this new format. This is going to be a rather significant amount of work required on our already full schedule. Also, for purposes of the schedule below, I wanted to let you know I will be on vacation from 8/23 to 9/9.

Do you have a recent comprehensive AQ rulemaking using this format that could be used as an example? Does Jill have one of these drafted for the upcoming "kitchen sink" package; or better yet was this format used in the PM2.5/GHG rule adoption DEQ did in 2011? That might be helpful in deciding how much detail is required to 'pass the muster'.

Thanks,
Max

From: Max Hueftle
Sent: Monday, July 22, 2013 4:55 PM
To: 'CURTIS Andrea'; Robbye Lanier
Cc: OLIPHANT Margaret
Subject: RE: Templates for Rulemaking

Andrea,

Thanks for the detailed schedule with dates to get this done. I will have time on my schedule to begin working on this starting Thursday (7/25) and the days that follow up until 7/31. If I have drafts and/or any questions before 7/31, I will let you know.

Max

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From: CURTIS Andrea [mailto:CURTIS.Andrea@deq.state.or.us]
Sent: Friday, July 12, 2013 3:38 PM
To: Max Hueftle; Robbye Lanier
Cc: OLIPHANT Margaret
Subject: Templates for Rulemaking

Max and Robbye,

I know we all look forward to wrapping up the four LRAPA rulemakings ☺ Let's talk next week about the templates and schedule. Attached are the two templates that we now use for rulemaking public notice: Invitation to Comment and Notice. The content is the same as what we used for previous rulemakings, but we revised the layout and consolidated forms.

We'd propose three packages: open burning, PM2.5/GHG; and permit streamlining. Below is the schedule that will allow us to propose each rule package for adoption at the December 2013 EQC meeting. We must open the public comment period 9/13/2013 to go to EQC in December.

Schedule:
Now through 7/31: LRAPA drafts rule package using attached templates. During that time, keep constant dialogue with DEQ (Andrea) to discuss the templates, answer questions and help ensure the fiscal analysis will be approved by DEQ's budget manager.
7/31 LRAPA provides DEQ and EPA the draft of each rule package for review
8/6 DEQ and EPA provide LRAPA with feedback
8/12 LRAPA provides DEQ and EPA updated rule package that addresses feedback
8/14 If new or revised fees are involved, this is the deadline to submit fee request to DAS – let's talk about any rules with new fees
8/15 DEQ submits package to Division Administrator (Andy G) for review and approval
8/23 Division Administrator review is due
8/23 – 9/6 DEQ and LRAPA address feedback from Division Administrator and obtain final approval to publish package
8/30 DEQ submits final package to EPA
9/13 DEQ submits approved package to Secretary of State; issues notice to interested parties and stakeholders. Comment period begins.
10/15 Hearing
10/18 Comment deadline

I'll follow up with the schedule following the comment deadline.

Thanks,

Andrea Curtis
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