From:	GARTENBAUM Andrea
To:	"Rose, Keith"
Subject:	RE: LRAPA Open Burning Rules
Date:	Friday, March 21, 2014 8:23:42 AM
Attachments:	2008 OB Stringency DEQ.pdf

Keith,

DEQ performed stringency analysis to confirm the rules are no less strict than any comparable rules or standards of DEQ. This is different than what I think you're asking for: Analysis on why changes to LRAPA's open burning rules are more stringent than previous versions of LRAPA's open burning rules. The summary of why LRAPA increased stringency is explained on page 6 of the staff report here: http://www.oregon.gov/deq/EQC/Documents/2014/March/O_LRAPAReports.pdf

Andrea Gartenbaum
Operations Division Rules Coordinator
Oregon Department of Environmental Quality
503-229-5946
gartenbaum.andrea@deq.state.or.us

-----Original Message-----
From: Rose, Keith [mailto:Rose.Keith@epa.gov]
Sent: Thursday, March 20, 2014 9:25 AM
To: GARTENBAUM Andrea
Subject: LRAPA Open Burning Rules

Andrea,
I'm working on the Federal Register notice to approve LRAPA revised open burning rules into the OR SIP. I've reviewed the changes to the rules, but it's not clear to me why some of the changes are more stringent than the previous version of the rule. I understand that ODEQ staff prepares an evaluation of all new proposed rules for the EQC before they approve them. Has any such analysis of the revised LRAPA open burning rules been developed? If so, please send me a copy of this analysis, it will help me develop the FR notice for this action. Contact me if you have any questions.
Thanks,
Keith