From: CALDERA Stephanie
To: GARTENBAUM Andrea
Subject: RE: EQC: Director"s report question about LRAPA item
Date: Thursday, December 12, 2013 11:41:08 AM

Perfect – thanks!

From: GARTENBAUM Andrea
Sent: Thursday, December 12, 2013 11:41 AM
To: CALDERA Stephanie
Subject: RE: EQC: Director's report question about LRAPA item

Stephanie,

The SOS Bulletin didn't contain the clause that the amendments to OAR 340-200-0040 would be submitted to EPA as a change to the State Implementation Plan. Also, the comment period didn't begin at least thirty days before the hearing. I think it began 29 days before the hearing. 30 days is a requirement for updating the SIP.

These are not requirements for normal DEQ rulemaking and they are not required for LRAPA to adopt rules in Lane County, but they are required for us to update 340-200-0040 to add the LRAPA rules to the SIP.

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Oregon Department of Environmental Quality
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From: CALDERA Stephanie
Sent: Thursday, December 12, 2013 10:17 AM
To: GARTENBAUM Andrea
Subject: EQC: Director's report question about LRAPA item

Hi Andrea,

Dick wanted to know a little more about the LRAPA item – specifically, what are the public comment requirements that weren't met? Scope of the comment period? Length? Need for a hearing? Whatever detail you know might be helpful.

Thanks!

Taken from:
Typically, DEQ submits LRAPA rules to the Environmental Quality Commission for incorporation into the State Implementation Plan upon adoption by the LRAPA Board. However, in this case, DEQ determined that the public notice process held jointly by DEQ and LRAPA several years ago did not meet requirements for State Implementation Plan

rules, which are above and beyond requirements for normal rulemaking.