From: CURTIS Andrea
To: GARRAHAN Paul
Cc: OLIPHANT Margaret
Subject: RE: EQC approval of LRAPA rules - 2008 Industrial Streamlining
Date: Monday, June 17, 2013 3:42:00 PM
Attachments: 2008IndustrialStreamliningLRAPA.zipx

Paul,

I'm compiling LRAPA's rulemaking documents for each of the four LRAPA rules DEQ will bring to EQC. We want to assess whether LRAPA's public notice was satisfactory and whether there's any need for DEQ to duplicate the public notice before proposing the rules to EQC for adoption.

This email addresses the **2008 Industrial Streamlining Rule**.

Attachments include:

- Fiscal Impact Statement with signature
- DEQ's Notice submitted to SOS
- Rule Summary and Stringency Analysis
- DEQ's stringency letter with a copy of the August 1, 2008 SOS Bulletin
- An affidavit of a newspaper ad published July 23, 2008
- Notice to interested parties
- LRAPA Board Minutes for September 9, 2008 (with public hearing)
- Hearing Officer Report
- LRAPA Board Minutes for October 14, 2008 (with rule adoption) – See page 10-15 for the Board's discussion about the public hearing and notice.

Let me know if you'd like me to find additional documentation for this rulemaking. I'll provide documentation for the other rulemakings and the Oakridge PM 2.5 plan approval in separate emails.

Thanks!

Andrea Curtis
Oregon Department of Environmental Quality
Air Quality Division
503-229-5946

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)

*****CONFIDENTIALITY NOTICE*****

This e-mail may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, please advise me immediately by reply e-mail, keep the contents confidential, and immediately delete the message and any attachments from your system.

****