Merlyn Hough, Director

Lane Regional Air Protection Agency

1010 Main Street

Springfield, OR 97477

Re: Proposed Amendments to LRAPA Title 47, Open Burning Rules

DEQ is proposing a rulemaking to incorporate Lane Regional Air Protection Agency rules into Oregon’s State Implementation Plan in Oregon Administrative Rule 340-200-0040. The LRAPA Board of Directors adopted rules for open burning, industrial permitting, and New Source Review and Prevention of Significant Deterioration rules for PM2.5 and greenhouse gases. Before LRAPA’s Board adopted the rules, DEQ reviewed the rules as needed and found the regulations to be as stringent as comparable rules of DEQ.

The LRAPA rules being proposed for incorporation into the SIP include:

* Title 47 open burning rules, received from LRAPA for review by DEQ July 16, 2007
* Industrial permitting rules, received from LRAPA for review by DEQ April 4, 2008
* PM2.5/greenhouse gas rules received from LRAPA for review by DEQ November 9, 2010
* Corrections to industrial permitting rules adopted in 2010 - LRAPA did not have DEQ review the corrections before adoption by the LRAPA Board because the rules corrected typographical errors and expanded LRAPA’s ability to permit small sources that are not permitted by DEQ.

DEQ hereby authorizes LRAPA to act as hearings Officer on behalf of the Environmental Quality Commission for public comment on DEQ’s rule amendments, including the proposal to amend OAR 340-200-0040 to incorporate relevant portions of these rules amendments as modification to the Oregon State Implementation Plan.

If you have any questions, please contact Andrea Curtis at 503-229-5946.

Sincerely,

Andrew Ginsburg

Air Quality Division Administrator

Oregon Department of Environmental Quality

CC: Andrea Curtis, Air Quality Division Rules Coordinator