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 LRAPA rules into Oregon’s State Implementation Plan in Oregon Administrative Rule 340-200-0040. These rules were previously amended and adopted by the LRAPA Board of Directors on the dates listed below and have been in effect in Lane County since their adoption.

This rulemaking proposes state adoption of four different rulemakings adopted by the LRAPA Board of Directors:

* **Open Burning:** LRAPA Title 47 adopted March 14, 2008
* **Industrial Streamlining Rules:** LRAPA Titles 12, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 40, 41, 42, 44, 46, 48, 49, and 50 adopted October 14, 2008
* **Industrial Streamlining Rules Updates and Corrections**: LRAPA Titles 12, 13, 30, 31, 34, 37, 38, 40, and 44 adopted January 12, 2010.
* **New Source Review, Particulate Matter 2.5 and Greenhouse Gas Permitting Requirements:**: LRAPA Titles 13, 32, 34, 36, 37, 38, 40, 46, and 50 adopted April 25, 2011

Before LRAPA’s Board adopted the rules, DEQ reviewed appropriate rules and found the regulations to be as stringent as comparable rules of DEQ. LRAPA did not have DEQ review the **industrial streamlining updates and 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 is holding a 30-day public comment period. DEQ hereby authorizes LRAPA to act as hearings Officer on behalf of the Environmental Quality Commission for public comment on the 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. The amendments will be presented to the Environmental Quality Commission for approval. If the EQC adopts the rule, it will be submitted by DEQ to the U.S. Environmental Protection Agency as a revision to the State Implementation Plan under OAR 340-200-0040 as a requirement of the Clean Air Act.

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