



Ms. Jill Inahara  
Oregon Department of Environmental Quality  
811 SW 6th Ave  
Portland, OR 97204

**Re: Comments on Rulemaking Proposal**

August 28, 2014

Dear Ms. Inahara:

NW Natural appreciates the opportunity to comment on DEQ's proposed rule language. We support Associated Oregon Industries' (AOI) comments and would like to highlight a few additional issues that are of concern to us. We hope you will take our comments into consideration when finalizing these rules.

Our primary concern is that this process did not follow typical DEQ rulemakings. While it was slated as a housekeeping process and minor changes for areas of the state with particulate issues caused by wood stoves, there are in fact significant and material revisions to notice and permitting requirements. Had this been clear at the outset, stakeholders would have been involved and the process would have been more transparent.

Though DEQ has communicated that the changes it has made are simply tidying up existing rules, this rulemaking actually appears to create an entirely new "State New Source Review" program that exists within the existing PSEL program. There are numerous changes in this proposed rule package with the potential to greatly impact NW Natural. Because of the incredible length and complexity of the new rules, and the long history of nuanced wording affecting applicability under the New Source Review program, it is difficult to decipher the true implications for our operations. However, our overall understanding is that permitting complexity, time and costs would increase.

We hope DEQ will delay adopting these rules until a more formal stakeholder process has the opportunity to determine which of the proposed changes are indeed housekeeping measures, and which changes warrant closer examination.

Thank you for your time. Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shanna Brownstein', with a long horizontal line extending to the right.

Shanna Brownstein