From: Garrahan Paul
To: INAHARA Jill; MONRO David; DAVIS George; FELDON Leah; GOLDSTEIN Meyer
Subject: RE: airquality2016temp rules
Date: Saturday, March 12, 2016 11:01:46

Here are some of my comments and thoughts.

- Add permit requirement—cross-referencing the general "source of concern" category in div. 216.
- Address "clunky" use of term "owner/operator." Define a single term. What term is defined in div. 200? "source"?
- Treatment of nickel is unclear. Says burn only in controlled furnace, then says you will set other limits if it proves a concern. Do we want to only allow use in controlled furnaces? Should there be an option to set a maximum usage rate in uncontrolled furnaces?
- I think some general "catch-all" delegation of authority like in the last rule is appropriate for other metals at this time, because this temporary rule is designed to address the immediate concerns identified at these facilities, right? If asked about that, you can say that's your purpose, and that issues regarding other metals will be addressed in the later, permanent program rulemaking. (I say "permanent program" because you also may need to adopt these temporary rules as permanent rules to keep them in place because you likely won't be ready to adopt the permanent program rules by Sept. 15. You could call them the interim permanent rules.)

Let me know if you would like to discuss my comments further.

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From: INAHARA Jill [mailto:jill.inahara@state.or.us]
Sent: Friday, March 11, 2016 5:30 PM
To: MONRO David; DAVIS George; FELDON Leah; GOLDSTEIN Meyer; GARRAHAN Paul
Subject: airquality2016temp rules

Hello all,
Very, very draft air toxics rule, not for sharing outside this select group.
Jill

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