From:	WILLIAMS Karen
To:	Infrastructure2018
Subject:	FW: Summary of meetings regarding infrastructure SIP timeline
Date:	Monday, June 18, 2018 08:33:27

Karen Font Williams | Air Quality Planner
DEQ Air Quality Division
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From: ORMAN Michael
Sent: Monday, June 18, 2018 7:32 AM
To: WILLIAMS Karen <WILLIAMS.Karen@deq.state.or.us>
Subject: Re: Summary of meetings regarding infrastructure SIP timeline

Hey Karen,

I recieved Director's approval to proceed on Friday last week. I'll forward to you. Let's discuss plans to proceed.

Thanks,

Michael R. Orman, PE*
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-------- Original message --------
From: WILLIAMS Karen <WILLIAMS.Karen@deq.state.or.us>
Date: 6/15/18 4:40 PM (GMT-08:00)
To: ORMAN Michael <ORMAN.Michael@deq.state.or.us>
Subject: Summary of meetings regarding infrastructure SIP timeline

Michael,
I am writing to summarize the meeting I had with Meyer and Emil on Monday and my conversations with EPA staff today, all regarding the short timeline to post the public review drafts of the infrastructure and interstate transport SIP reports.

Meyer mentioned that he would not be presenting rulemaking proposals to the Director this week because the Director had requested a different process. He recommended that if we intend to

proceed with the rulemaking, we (meaning the AQ DA) should request approval of the Director directly. He also expressed deep concerns with a rush to public comment in that it would short-change the internal review process and potentially lead to errors that would need to be corrected later. If meeting the October 1 CAA deadline was essential, he suggested we consider a temporary rulemaking, which would not require a public comment period. Then we would follow with a permanent rulemaking, public comment period and present to EQC in November.

Today, I spoke with Christi Duboiski and Claudia Vaupel of Region 10 EPA, the two staff people who would be reviewing the infrastructure and interstate transport reports, respectively. I had sent them drafts Wednesday morning and both had already taken a look at them by this afternoon. Their feedback was positive and they will be sending me informal comments Tuesday next week. I would characterize both Christi's and Claudia's responses to the idea of a temporary rulemaking as highly skeptical. Neither thought that EPA would be able to accept or even conditionally approve a SIP update that did had not passed through public comment. Each was going to talk with one or more colleagues and let me know next week if they learned anything that would change their response.

Perhaps we can check in Monday or Tuesday about asking Ali to request the Director's approval to proceed with public comment on the draft SIP reports.

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