

From: [Lisa Carlson](#)
To: [Paula Wilson](#)
Subject: FW: CRB Negotiated Rule Idea
Date: Wednesday, July 13, 2016 2:21:49 PM

From: McGown, Michael [mailto:McGown.Michael@epa.gov]
Sent: Wednesday, July 13, 2016 11:18 AM
To: Mary Anderson
Cc: Tiffany Floyd; Lisa Carlson
Subject: CRB Negotiated Rule Idea

Mary,

Here is a summary of the idea I shared with you late last week. I worry that a rule change that only loosens the Ozone trigger will be detrimental to the relationships that we have built over the last 8 years. I think this proposal would provide a path forward to opens up additional burn days for burners while addressing the concerns raised by SAFE and ICL. I also think it would be very easy to implement and operate. This would apply statewide and provides a significant additional opportunity to burn from the current rule. It also incorporates a lower PM trigger when Ozone flexibility is provided to address potential health concerns raised by SAFE and ICL. It is consistent with the recommendation of CRB advisory committee and incorporates the health data provided by the PhD Toxicologists who informed the committee.

- 1) IDEQ would make a yes/no burn decision based upon the existing rule of 75% of any NAAQS. Same as is currently done.
- 2) If the 75% of the NAAQS criteria was met for all pollutants except Ozone, IDEQ would then reconsider the burn decision with the criteria of meeting 90% for Ozone and 60% of the PM2.5 std.

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