

From: Logan Caldwell [mailto:lc@hbioc.net]
Sent: Friday, June 05, 2015 1:58 PM
To: Chowdhury, Hafizur@ARB
Subject: Exclusion from Resubmitting Lifecycle Analysis for Existing Tier 1 Pathways?

Hafizur:

On the phone yesterday, you mentioned that producers with existing Method 2A pathways would not need to resubmit a revised lifecycle analysis to get their pathways recertified. I am looking in the regulations for that exception and cannot locate it. Could you clarify or point me in the direction of that provision in the regulations?

I see the provision that the demonstration of physical pathway has been "grandfathered" for existing pathways in 95488(e), which was added as part of the changes accompanying the 15 day package, but I don't see a similar provision for the LCA.

Sorry to trouble you if it is there and I can't find it.

Regards,
Logan

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