



Oregon

John A. Kitzhaber, M.D., Governor

Department of Environmental Quality

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June 25, 1999

Rob Wilson (OEA-095)
EPA Region X
1200 Sixth Avenue
Seattle, WA 98101

RE: Request for approval for using Calpuff

Dear Mr. Wilson,

We currently have two applications that need to perform long-range transport modeling to address regional haze formation. These include Nucor Steel in North Bend, Oregon and Georgia Pacific Corporation in Toledo, Oregon. For both of these applications, the nearest PSD Class I area is over 50 kilometers away. OAR 340-28-1940 requires approval from both our Department and from EPA for using any model that is not currently in 40 CFR Part 51, Appendix "W."

I am requesting blanket approval to use Calpuff to address long-range regional haze impacts for all new sources for the following reasons:

- Section 7.2.6 of 40 CFR 51, Appendix "W" addresses Long Range Transport (LRT). Here it states that "If LRT is determined to be important, then estimates utilizing an appropriate refined model for receptors at distances greater than 50 km should be obtained." However, it currently does not provide a recommended refined model. Thus, there is no currently recommended EPA Guideline model for LRT.
- Calpuff is scheduled to be proposed for inclusion into 40 CFR 51, Appendix "W" with the Seventh National Modeling Conference this year as a refined model for LRT. This will propose Calpuff as the recommended EPA Guideline model for this type of application.
- The Interagency Workgroup on Air Quality Modeling (IWAQM) has recommended that Calpuff be used for addressing Air Quality Related Value (AQRV) impacts within PSD Class I areas. This recommendation is both on a theoretical basis as well as on performance demonstrations. These recommendations should be available in your office.
- The Federal Land Managers are also recommending that Calpuff be used for evaluating long-range AQRV impacts within their Class I areas.
- Calpuff is being used for long-range AQRV modeling in other parts of the country.

We understand that this still needs to go through the public hearing process should you approve the use of Calpuff for long-range AQRV impacts. This would be performed as a part of the permit process.

Thank you for your consideration. If you have any questions, please contact me at 503-229-6048.

Sincerely,

Patrick L. Hanrahan, Modeling Coordinator
Air Quality Division

cc: Gary Andes, Western Region, Salem
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