

**DEPT. OF ENVIRONMENTAL CONSERVATION**

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February 4, 1998

Ms. Janis Hastings, Director  
Office of Environmental Assessment  
U.S. EPA Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

Re: Review of the ISCPRIME model, GVEA Healy Power Plant Air Quality Control No. X049

Dear Ms. Hastings:

I am writing to request that the EPA federal administrator approve the use of ISCPRIME to assess the ambient air quality impacts at the Golden Valley Electric Association (GVEA) Healy power plant. We have received an Air Quality Control Construction Permit application to revise a Prevention of Significant Deterioration (PSD) decision. The applicant used ISCPRIME to demonstrate that the emissions from their facility will not cause or contribute to a violation of an ambient air standard or increment. In accordance with Alaska Administrative Code 18 AAC 50.215 (c), the federal administrator must grant approval for the use of a non-guideline model in an air quality control permit application.

The basis for this request is included in the report and information that GVEA has submitted to your office under separate cover. Although ADEC has not completed a final analysis of the amendment request, ADEC's involvement in the approval of the modeling protocol and technical briefings with the Regional Meteorologist, Rob Wilson, and model consultant(s), (EPRI, ENSR Corporation, and Science & Technology Management, Inc.), gives us confidence in this model. Further, our review indicates ISCPRIME has a sound theoretical basis. GVEA's performance evaluation should show it to be appropriate and applicable to Healy Unit #1.

GVEA's report has been developed to meet the criteria as set forth in EPA guidance documents: a) Workbook for Comparison of Air Quality Models; b) Interim Procedures for Evaluating Air Quality Models; and c) Protocol for Determining the Best Performing Model. The candidate data bases present case studies similar to GVEA Healy Unit #1 and meteorological conditions representative of the Healy plant area in Alaska. ISCPRIME, as qualified in the GVEA report, predicts more accurately than Guideline models. The attachments, sent to Rob

Ms. Janis Hastings

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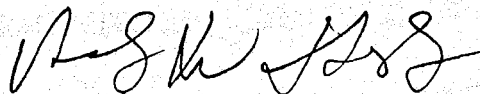
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Wilson of your staff by GVEA under separate cover, show receptor predictions, results of model runs, technical support documents, the ISCPRIME model, data input/output files, and reviewer comments.

The State will be working separately with GVEA, Electric Power Research Institute (EPRI), and others to request EPA's Office of Air Quality Planning and Standards (OAQPS) review the ISCPRIME model for consideration and acceptance as a Federal Guideline method. We request any support you can provide in this regard.

If you have questions about this request, please contact Mr. Jeff Anderson of my staff at (907) 465-5117.

Sincerely,



Robert W. Hughes, Manager  
Permits and Compliance

RWH/JA/pal (h:\home\janderso\primeltr.98)

cc: Bud Rolofson, National Parks Service (NPS), Denver  
Joan Darnell, NPS, Anchorage  
Michele Brown, Commissioner, ADEC, Juneau  
Rob Wilson, EPA, Region 10, Seattle  
John M. Stone, Chief, ADEC/AQM  
James Baumgartner, ADEC/AQM