

## U.S. ENVIRONMENTAL PROTECTION AGENCY

## REGION X

1200 SIXTH AVENUE

SEATTLE, WASHINGTON 98101

March 15, 1985

REPLY TO  
ATTN OF: M/S 532

Ms. Lynda L. Brothers  
Assistant Director  
Department of Ecology, Mail Stop PV-11  
State of Washington  
Olympia, Washington 98504

Dear Ms. Brothers:

On March 12, 1985, we received a copy of a proposed air quality modeling plan submitted by the H. E. Cramer Company (HEC) on behalf of Energy Products of Idaho (EPI). The modeling analysis will support EPI's application to your agency for a PSD permit to construct a coal-fired cogeneration facility in the tideflats area of Tacoma. Because HEC is proposing to use a model which is not recommended in EPA's "Guideline on Air Quality Models," your staff has requested EPA approval of the modeling plan.

EPA regulations [40 CFR 52.21 (1)] require that all concentration estimates for a PSD air quality analyses be based on recommendations specified in EPA's modeling guidance. Any deviations from the Guideline requires written approval of the Administrator of EPA.

The HEC proposal is to use the SHORTZ Model (EPA-903/9-82-004a and b) in the rural mode with stability class F reassigned to stability class E, and one full year of meteorological data. This use of SHORTZ is consistent with previous uses of the model for the Tacoma area, and approval for use in the EPI PSD analysis is hereby granted.

EPA regulations also require that this deviation from the "Guideline on Air Quality Models" be subject to notice and opportunity for public comment under paragraph (q) of 40 CFR 52.21. This can be accomplished during the Preliminary Determination phase of the PSD permit approval process.

If you have any questions about this approval of the SHORTZ Model, please contact Michael Johnston of my staff at 442-8507.

Sincerely,

Gary L. O'Neal  
Director, Air and Toxics Division

cc: J. Tikvart, EPA/OAQPS