

January 10, 2017

Dennis McLerran, Regional Administrator U.S. Environmental Protection Agency, Region 10 1200 Sixth Avenue, Suite 900 Seattle WA 98101

Re: Recommendations for 1-Hour Sulfur Dioxide Area Designations

Dear Mr. McLerran:

On August 10, 2015, the U.S. Environmental Protection Agency finalized requirements for state air agencies to assess the ambient air quality for the 1-hour sulfur dioxide (SO<sub>2</sub>) National Air Ambient Quality Standard (NAAQS) in areas of the state impacted by significant sources of SO<sub>2</sub>. The rule established that, at a minimum, air agencies must characterize air quality around sources that emit 2,000 tons per year (tpy) or more of SO<sub>2</sub>.

The Portland General Electric (PGE) Boardman coal-fired power plant, source # 25-0016 in Morrow County, was the only facility in Oregon that exceeded that threshold. DEQ elected to use air quality modeling to make the demonstration for determining the 1-hr SO<sub>2</sub> area designation, and DEQ worked with PGE to perform that analysis. This modeling was carried out in accordance with a protocol submitted to and approved by EPA Region 10. The results of that analysis, presented in a report submitted separately to Region 10, show modeled impacts of SO<sub>2</sub> emissions from the plant do not result in exceedances of the 1-hour standard.

Therefore, I am pleased to present to you my recommendations for air quality designations in the State of Oregon for the 1-hour (SO<sub>2</sub>) National Ambient Air Quality Standard. In accordance with U.S. EPA guidance, DEQ recommends Morrow County be designated "Unclassifiable/Attainment" and the remaining counties be designated "Unclassifiable".

If you have any questions, please contact David Collier, Manager, Air Quality Planning, Department of Environmental Quality, at (503) 229-5177.

Sincerely,

Richard Whitman Director

Cc: Oregon Congressional Delegation Merlyn Hough, Director, Lane Regional Air Protection Agency Tim Hamlin, Director, U.S. EPA Region 10 Office of Air and Waste Debra Suzuki, Manager, U.S. EPA Region 10 Air Planning Unit