

## Ames, Rodger

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**From:** Herron-Thorpe, Farren (ECY) <fher461@ECY.WA.GOV>  
**Sent:** Wednesday, September 05, 2018 8:54 AM  
**To:** Ames, Rodger  
**Cc:** Moore, Tom  
**Subject:** FW: Unpaved Road Dust in the WRAP Regional Haze EI / Modeling effort

Hi Rodger,

Could you add some notes regarding unpaved road dust for Oregon in the wiki table?

Oregon says that they would welcome new numbers for unpaved road dust but do not have the staff hours to calculate those numbers.

Perhaps Washington can calculate it for them (using the same method as WA). We do a WA/ID/OR EI for our regional AIRPACT modeling, so this could be something we do later this year to help both WRAP and AIRPACT.

Thanks,

Farren L. Herron-Thorpe  
Modeling & Emissions Inventory Scientist  
Air Quality Program, Washington State Dept. of Ecology  
P.O. Box 47600, Olympia, WA 98504-7600  
Telephone: (360) 407-7658  
Email: [farren.herron-thorpe@ecy.wa.gov](mailto:farren.herron-thorpe@ecy.wa.gov)

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**From:** SWAB Christopher [mailto:Christopher.SWAB@state.or.us]  
**Sent:** Tuesday, September 04, 2018 6:01 AM  
**To:** Herron-Thorpe, Farren (ECY) <fher461@ECY.WA.GOV>  
**Cc:** ALLEN Philip <Philip.ALLEN@state.or.us>  
**Subject:** RE: Unpaved Road Dust in the WRAP Regional Haze EI / Modeling effort

Farren-

Oregon won't be submitting any new data. If I'm not here, either Phil or my replacement would be the person to review any new numbers.

Thanks,  
Chris

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**From:** Herron-Thorpe, Farren (ECY) <[fher461@ECY.WA.GOV](mailto:fher461@ECY.WA.GOV)>  
**Sent:** Friday, August 31, 2018 10:59 AM  
**To:** SWAB Christopher <[Christopher.SWAB@state.or.us](mailto:Christopher.SWAB@state.or.us)>; ALLEN Philip <[Philip.ALLEN@state.or.us](mailto:Philip.ALLEN@state.or.us)>  
**Subject:** RE: Unpaved Road Dust in the WRAP Regional Haze EI / Modeling effort

For the WRAP modeling, we've been digging deeper than an all-sector range check. It sounds like Oregon will not be submitting new unpaved road dust numbers for the WRAP RH effort. If the WRAP RH EI & MP identifies an alternate method to use, would Oregon like to review the numbers before they are updated by the group? No guarantee it will happen, but it could be doable.

-Farren

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**From:** SWAB Christopher [<mailto:Christopher.SWAB@state.or.us>]

**Sent:** Friday, August 31, 2018 10:33 AM

**To:** Herron-Thorpe, Farren (ECY) <[pher461@ECY.WA.GOV](mailto:pher461@ECY.WA.GOV)>; ALLEN Philip <[Philip.ALLEN@state.or.us](mailto:Philip.ALLEN@state.or.us)>

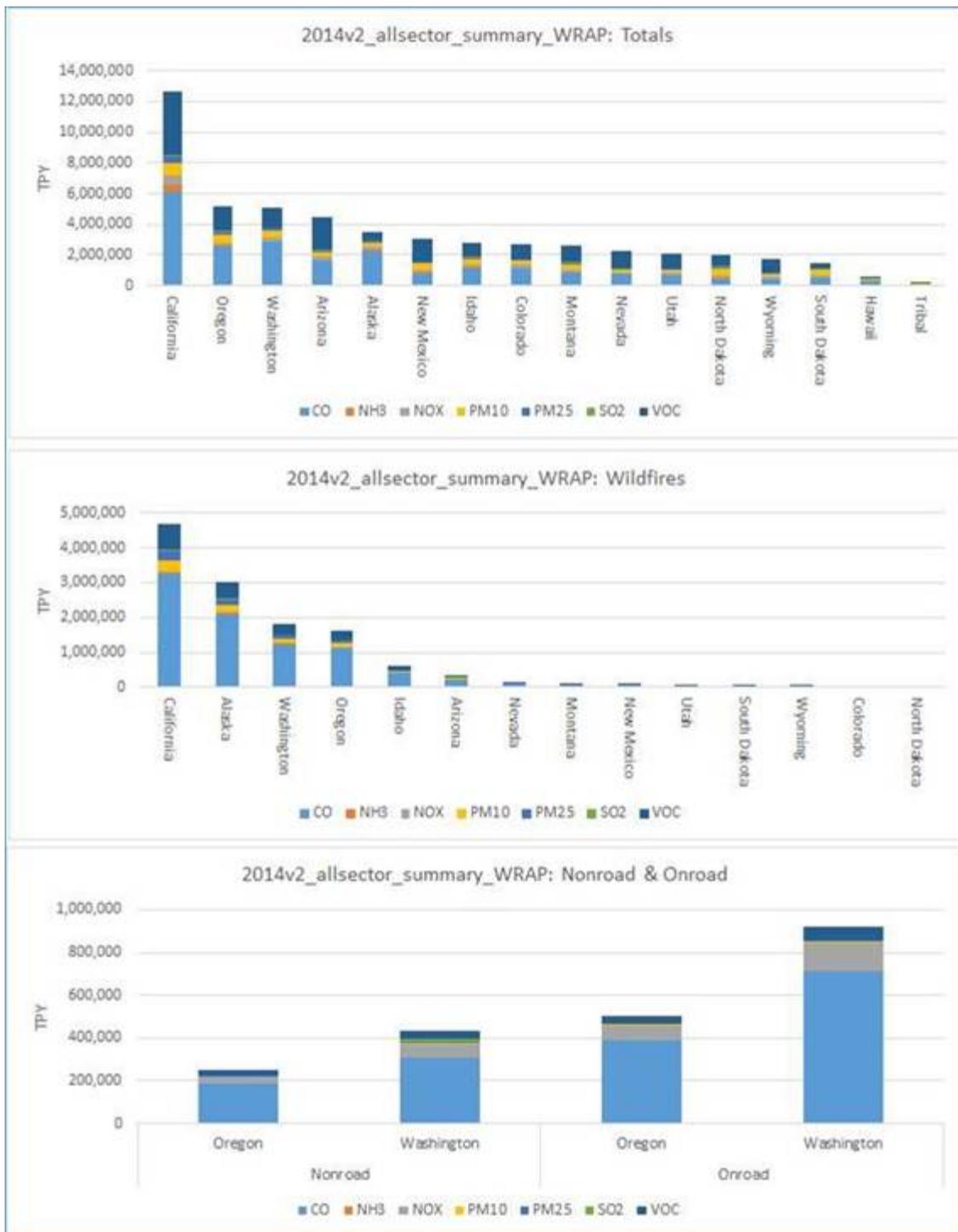
**Subject:** RE: Unpaved Road Dust in the WRAP Regional Haze EI / Modeling effort

Hi Farren,

My earlier range checks showed that Oregon's total annual criteria pollutant emissions are comparable to Washington's (the first chart below). As such, my guess is that you're concerned that Oregon's elevated road dust will cause erroneous dispersion modeling during the summer months for areas near roadways. That being said, the nominal sentence is the one I've highlighted in your email; The fugitive road dust EI data for Oregon are entirely EPA's data. I'm sure that Jeffrey and Phil would be happy for a re-do, however please be aware that there aren't any technical staff at DEQ that would be able to model fugitive road dust emissions, e.g. Ecology staff would have to do the re-do.

Chris

PS – you missed a great pizza and beer party after the move.



**From:** Herron-Thorpe, Farren (ECY) <[pher461@ecy.wa.gov](mailto:pher461@ecy.wa.gov)>

**Sent:** Friday, August 31, 2018 9:40 AM

**To:** ALLEN Philip <[ALLEN.Philip@deq.state.or.us](mailto:ALLEN.Philip@deq.state.or.us)>; SWAB Christopher <[Christopher.SWAB@state.or.us](mailto:Christopher.SWAB@state.or.us)>

**Subject:** Unpaved Road Dust in the WRAP Regional Haze EI / Modeling effort

Hi Chris/Phil

We are looking at unpaved road dust emissions in the 2014 NEI v2, which is the starting point for the WRAP Regional Haze modeling effort.

Western Oregon is very different than the rest of the region, and in fact Oregon has 3 times the unpaved road dust of any other WRAP state (other than New Mexico).

Please see the materials attached and let me know how you would like to proceed. We can either try to redo the numbers or accept it as-is.

For reference, both California and Washington did their own unpaved road dust submission, so the EPA tool was not used there, which is probably why there is such a stark contrast along the I-5 corridor.

Thanks,

Farren L. Herron-Thorpe  
Modeling & Emissions Inventory Scientist  
Air Quality Program, Washington State Dept. of Ecology  
P.O. Box 47600, Olympia, WA 98504-7600  
Telephone: (360) 407-7658  
Email: [farren.herron-thorpe@ecy.wa.gov](mailto:farren.herron-thorpe@ecy.wa.gov)