

HMM Ref. No. 2603/ADMIN/143

March 16, 1989

Mr. David Howland
Department of Environmental Quality Engineering
436 Dwight Street
Springfield, MA 01103

Mr. Steve Dennis
Department of Environmental Quality Engineering
1 Winter Street
Boston, MA 02108

Subject: MASSPOWER Air Quality Modeling Protocol
Urban Versus Rural Land Classification for MMWEC Station

Dear Messrs. Howland and Dennis:

The subject protocol, submitted on January 30, 1989, documents air quality assessment procedures to be used for the MASSPOWER cogeneration facility. MASSPOWER is a proposed major source and will require approval under PSD rules. As we discussed on March 3, 1989 in Boston, the MMWEC Station is a nearby major increment consuming source that must be modeled interactively with MASSPOWER. Complications associated with modeling MMWEC as an urban source have developed in preliminary model runs. MMWEC Station was modeled as an urban source because the MASSPOWER site on the Monsanto industrial complex was determined to be urban and hence dictated the use of the urban mode of ISCST for interactive modeling. Urban was chosen for interactive modeling because MASSPOWER is the focus of the permitting study, and all sources in an interactive assessment must be treated in the same mode because the ISCST computer code does not allow for a mixed (rural and urban) classification of sources.

The attached technical memorandum and attachments document the issue and its complications and presents our recommended solution, which is to treat the MMWEC Station as a rural source. This would allow an accurate assessment of incremental ambient concentrations due to MMWEC emissions and would be consistent with previous modeling, which is the basis of the current MMWEC operating permit. We do not see any modeling guidance from the USEPA, which suggests that mixing of urban and rural sources is inappropriate. This is particularly true for the situation at hand, where a rural source (MMWEC) modeled urban (because of code limitations) causes unacceptable results which are an impediment to permitting of another source.

On behalf of MASSPOWER and in accordance with the attached technical assessment, I am requesting your concurrence with our determination that MMWEC Station should be modeled as a rural source.

Your attention to this important matter is greatly appreciated.

Sincerely,



Robert V. Bibbo

RVB/lap
Enclosure

cc: John Matteson (DEQE)
Mike Guski (HMM Associates)
George Lipka (HMM Associates)