

DRAFT

Mr. Stephen Dennis  
Division of Air Quality Control  
Massachusetts Department of  
Environmental Quality Engineering  
One Winter Street  
Boston, MA 02108

Re: MassPower PSD Modeling Question

Dear Mr. Dennis:

I am responding to your letter of March 23, 1989 concerning selection of urban or rural dispersion coefficients for a background source (MMWEC) which is being included in the air quality demonstration for MassPower/Monsanto in Springfield. Given that the area surrounding MassPower/Monsanto has an urban land use classification, pursuant to the Guideline on Air Quality Models (EPA 1986 and 1987), at page 8-10, MassPower and significant background sources such as MMWEC must be modeled as urban. (I have attached EPA's Clearinghouse memorandum interpreting the Guideline requirement.)

As always, the DEQE may wish to require further analyses as indicated by your letter (i.e., additional analyses with rural dispersion coefficients). However, the Guideline requirement does not permit you to alter the results of the required analysis employing urban dispersion coefficients by substituting rural results at specific problem receptors on a case-by-case judgment basis. Where MMWEC is located as close as 4.5 km from MassPower/Monsanto, such a scheme would require you to combine dispersion coefficients at receptors within the same geographical area. The requirements of EPA's Guideline are intended to prevent such a combination.

DEQE is, therefore, consistent with the Guideline requirements in rejecting MassPower's proposal to model MassPower using urban dispersion coefficients and MMWEC using rural ones over the same modeling domain.

If you have further questions, please call me at 565-3225.

Sincerely,

Susan C. Kulstad  
Chief, Technical Assistance Section  
Air Management Division

Attachment