

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: March 28, 1989

SUBJECT: MassPower PSD - Urban v Rural for Background Source

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TO: Joseph A. Tikvart  
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Based on my telephone conversation today with Dean Wilson, I have drafted the attached letter responding to Massachusetts DEQE's referenced modeling question. Please review and comment on the draft response, and provide written interpretation of the Guideline requirement as it pertains to MassPower's situation.

As MassPower's consultant notes in their letter to DEQE, MMWEC (the background source) alone would be classified as rural. Initial model results indicate that MMWEC alone modeled with rural dispersion coefficients could accommodate area growth, but modeled with urban dispersion coefficients exceeds the 24-hr SO<sub>2</sub> Class II PSD increment. Building downwash is involved. Therefore, if I've correctly interpreted the Guideline requirement in my draft response, MassPower's analysis may well show a violation of the PSD increment due solely to MMWEC; but an independent analysis of MMWEC alone could correctly show protection of the PSD increment.