



Commonwealth of Massachusetts
Executive Office of Environmental Affairs

**Department of
Environmental Protection**

William F. Weld
Governor

Daniel S. Greenbaum
Commissioner

January 15, 1992

Brian Hennessey
Air, Pesticides, and Toxics Management Division
U.S. Environmental Protection Agency
Region I
JFK Federal Building
Boston, Massachusetts 02203

Dear Brian,

This is a request for guidance concerning a proposal, made as part of the Taunton Energy Center (TEC) PSD/Air Plans Application, to change the stack configuration at the existing Taunton Municipal Light Plant (TMLP) from two stacks to a single stack of greater height. The existing 56.4 meter and 27 meter (TMLP) stacks are to be replaced by a single 76 meter stack. This proposal was prompted by the plan to construct a boiler building for the proposed TEC nearby to the TMLP stacks. The formula GEP height for the boiler building is 397 feet (121 meters). The proponent (TEC) requests credit for the (TMLP) stack height increase arguing that the increase is necessary to avoid Schulman-Scire downwashing.

As you are aware, in the memorandum dated October 16, 1991 concerning a request for credit for a stack height increase at the Dade County, Florida, Resource Recovery Facility, EPA ruled that no credit above 65 meters be given unless shown to be justified by fluid modeling (or through demonstration of a local nuisance, which doesn't apply here.) Does the Dade County ruling hold for the Taunton project?

If you have any questions or need more information, please call me at 292-5766.

Very truly yours,

Richard Fields
Modeling Branch