The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Quality Engineering
Division of Air Quality Control
One Winter Street, Boston 02108

MAR 24 89

March 23, 1989

Susan Kulstad
U.S. EPA - Region I
J.F.K. Federal Building
Boston, Massachusetts 02203

Dear Susan:

DEQE is presently reviewing an application for a PSD permit in the Springfield area. The proposed source will be located in an urban dispersion environment (52% urban based upon Auer urban land use categories). However, a nearby existing PSD source which must be considered in the PSD increment analysis is apparently located in a rural dispersion environment. Increment consumption for the existing PSD source was originally determined with the CRSTER model using rural dispersion coefficients.

The project proponent would like to model the proposed source with urban dispersion coefficients and the existing source with rural dispersion coefficients (over the same modeling domain) since increment consumption for the existing source was originally determined with rural coefficients. The Department, on the other hand, is requesting that two sets of modeling runs be performed for these sources - one set of five year runs with urban coefficients and a second set of five year runs with rural coefficients. If there are any receptors above allowable PSD increments, the Department will consider recalculating the "rural" source contribution at such receptors with rural dispersion coefficients - <u>if</u> land use and meteorology clearly indicates the reasonableness of this approach.

Enclosed is technical support containing land use determinations submitted in the proposed modeling protocol. I would appreciate your opinion and any guidance which can be provided by the Modeling Clearinghouse regarding this issue.

Very truly yours,

Steven Dennis

Stephen Dennis

SD/ch

Enclosure

cc: D. Howland
J. Kirzec
D. Grassick
R. Fields
E. Valis
S. Simon