



Deval L. Patrick, Governor
Timothy P. Murray, Lt. Governor
Jeffrey B. Mullan, Secretary & CEO
Frank DePaola, Acting Administrator



September 30, 2011

Kenneth Kimmell, Commissioner
Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108

Subject: Renewal of Operating Certification Central Artery (I-93)/Tunnel (I-90)
Project Ventilation System

Dear Commissioner Kimmell:

The Massachusetts Department of Transportation (MassDOT) is pleased to submit to MassDEP for review and acceptance, the renewal application of the Operating Certification for the Central Artery (I-93) / Tunnel (I-90) (CA/T) Project Ventilation System.

The MassDOT submitted on July 1, 2011 the renewal application of the Operating Certification for the Central Artery/Tunnel (CA/T) Project Ventilation System pursuant to 310 CMR 7.38 (Certification of Tunnel Ventilation Systems in the Metropolitan Air Pollution Control District). The renewal application contained a technical support document (TSD) and several appendices and attachments. In accordance with 310 CMR 7.38 (5), within 30 days of receipt of the renewal application, Massachusetts Department of Environmental Protection (MassDEP) shall make a determination whether all information necessary for review has been submitted. On July 28, 2011 we received a notification that MassDEP has determined that the renewal application as currently drafted in the July 1, 2011 submittal was incomplete. MassDEP identified in such letter signed by Christine Kirby (Deputy Director, Division of Consumer and Transportation Programs) a list of corrections or clarifications in the TSD. MassDEP found the CDROM and printed copy of all seven appendices to provide adequate supporting information. The attached TSD has been revised to address all the corrections and clarifications identified in the MassDEP letter of July 28, 2011. The CDROM containing all seven appendices remains valid and it is not being re-submitted.

Summary of the process provided in the July 1, 2011 MassDOT submittal process.

In compliance with MassDEP Regulation 310 CMR 7.38, the CA/T Project filed an Operating Certification for the Project's Tunnel Ventilation System during 2006 in which it established emission limits for the exhaust of each Ventilation Building, Dewey Square tunnel (DST), and longitudinally ventilated exit ramps. MassDEP gave final acceptance to the 2006 CA/T Operating Certification in December 22, 2006.

The 2006 Operating Certification demonstrated that the operation of the CA/T Tunnel Ventilation System will not cause a violation of applicable National and State Ambient Air Quality Standards (NAAQS), and MassDEP one-hour NO₂ Policy Guideline and criteria specified in 310 CMR 7.38.

The 2006 Operating Certification established tunnel emission limits for carbon monoxide (CO), nitrogen oxides (NO_x) and particulate matter equal to or smaller than 10 microns in diameter (PM₁₀) that allowed the tunnel ventilation system to demonstrate compliance with ambient air quality standards for CO, NO₂, and PM₁₀ and state policy guidelines for NO₂. It also established that the CA/T Project was within the regional emissions budget for volatile organic compounds (VOC) based on the 2005 CA/T build predictions, which included highway and transit components. The 2006 Operating Certification also included: a Compliance Monitoring Program for CO and PM₁₀; Record Keeping and Reporting requirements and procedures; and Corrective Actions that would be required if any of the established emission limits were exceeded.

MassDEP Regulation 310 CMR 7.38 requires MassDOT to renew the Operating Certification every five years. The attached Technical Support Document (TSD) is part of the July 2011 renewal application, which will cover the period from December 22, 2011 to December 22, 2016.

Following the format of the 2006 Operating Certification, the attached TSD has four parts and includes one attachment and seven appendices. Part I of the TSD describes in detail, the CA/T ventilation system and pollutant emission limits that were established for vehicle exhaust from ventilation buildings and longitudinally ventilated exit ramps. Part II of the TSD describes the CA/T's compliance monitoring program, including the Continuing Emissions Monitoring (CEM) system that was installed to demonstrate compliance with established emission limits. Attachment 1 to the TSD provides information regarding the day-to-day operation of the CEM equipment. Part III of the TSD describes the record keeping and data reporting aspects of the CA/T's Operating Certification. This includes CEM, traffic and maintenance reports. Part IV of the TSD describes corrective actions (i.e. contingency plan) that will be taken by MassDOT in the event that any of the established emission limits are exceeded due to normal day-to-day traffic conditions, and a summary of the data collected between 2006 and 2011.

For the 2011 Renewal Application MassDEP requires new emission limits for PM_{2.5} to comply with the PM_{2.5} NAAQS. These new emission limits for PM_{2.5} will replace the emission limits currently in effect for PM₁₀. In 2010 MassDEP also made a determination that the 2011 application must also include a demonstration of compliance with the new one-hour NO₂ NAAQS established in 2010.

On March 18, 2011, MassDOT proposed to MassDEP that the July 2011 application for renewal of the operating certification include new emission limits for PM_{2.5} and address compliance with the established emission budget for VOC. In addition, MassDOT

proposed to defer setting revised emission limits for NOx and CO for all Project ventilation buildings and longitudinally ventilated ramps until July 2012. The one-year postponement will allow MassDOT to develop new CO and NOx emission limits based on the monitoring data being collected at the DST and Albany Street monitors. On May 12, 2011, MassDEP accepted MassDOT proposed approach indicating that the July 2012 submittal will be presented as a "supplemental application" to the 2011 operating certification renewal application. As such, the current emission limits (2006-2011) for CO and NOx will remain in effect until MassDEP accepts the July 2012 Supplemental Application.

In support of this revised submittal, enclosed please find six copies of a Technical Support Document (TSD) entitled, "Central Artery (I-93)/Tunnel (I-90) Project, Operating Certification of the Project Ventilation System," dated August 31, 2011.

With this filing, MassDOT looks forward to MassDEP review of the CA/T's Operating Certification, including the holding of a public hearing to receive public input on the Operating Certification, and, offer MassDEP due consideration of the TSD and any public comments, to MassDEP acceptance of the CA/T's Operating Certification.

My point of contact with this Operating Certification is Mr. Rick McCullough, District 6 Director of Environmental Engineering, who may be reached at (781)431-5020.

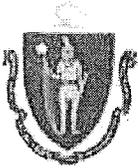
Sincerely,

Massachusetts Department of Transportation
Highway Division



Walter Heller, PE
Acting District Highway Director
MassDOT District 6

cc: Steve Lipman, PE – MassDEP
Jerome Grafe – MassDEP
Rick McCullough - MassDOT



Deval L. Patrick, Governor
Timothy P. Murray, Lt. Governor
Jeffrey B. Mullan, Secretary & CEO
Frank DePaola, Acting Administrator



ERRATA SHEET

With Reference to the October 4th submittal, the cover letter dated September 30, 2011 to:

Kenneth Kimmell, Commissioner
Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108

Subject: Renewal of Operating Certification Central Artery (I-93)/Tunnel (I-90)
Project Ventilation System

Signed by:
Walter Heller, PE
Acting District Highway Director
MassDOT District 6

The second paragraph from the third page which reads:

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It should be corrected to read:

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Sincerely,

Steven Tarantino
Sr. Environmental Engineer
Massachusetts Department of Transportation
Highway Division

cc: Steve Lipman, PE – MassDEP
Jerome Grafe – MassDEP
Rick McCullough - MassDOT