



The State of New Hampshire
Department of Environmental Services



Thomas S. Burack, Commissioner

January 5, 2016

Mr. H. Curtis Spalding
Regional Administrator
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

RE: 40 CFR Part 51 Subpart BB Data Requirements for Characterizing Air Quality for the Primary SO₂ NAAQS

Dear Administrator Spalding:

Pursuant to the above referenced rule that became effective on September 21, 2015, New Hampshire does not currently have any stationary sources that emit 2,000 tons per year or more of SO₂ emissions¹. However, the New Hampshire Department of Environmental Services (NHDES) is submitting the following list of stationary sources that have been identified as requiring further air quality characterization: Public Service of New Hampshire d/b/a Eversource Energy, Schiller Station (Schiller) and Newington Station (Newington). These two energy generating units are located in Portsmouth and Newington, New Hampshire respectively.

NHDES is currently evaluating² the impacts of SO₂ emissions from Schiller and Newington with respect to the 1-hour SO₂ National Ambient Air Quality Standards (NAAQS) for the purposes of responding to Sierra Club's Title V Petition (VI-2014-04) granted in part by the United States Environmental Protection Agency (EPA) on July 28, 2015, with respect to the issuance of a Title V Operating Permit (TV-0053) to Schiller on April 14, 2014. The NHDES responded to EPA's July 28, 2015 order with a plan to further evaluate the above mentioned sources with respect to the 1-hour SO₂ NAAQS including a detailed schedule for the case-by-case air dispersion modeling analysis in a letter dated October 23, 2015. The results of the analysis will be shared with EPA and any resulting emission limitations that are deemed necessary to ensure attainment of the 1-hour SO₂ NAAQS will be incorporated into federally enforceable permits by the January 13, 2017 deadline specified in 40 CFR Part 51 Subpart BB.

If you have any questions, please contact me at (603) 271-1088 or Michele Roberge of my staff at (603) 271-6793.

Sincerely,

Craig A. Wright
Director
Air Resources Division

¹ Based on NHDES 2013 and 2014 SO₂ stationary source emissions inventory.

² NHDES will complete its case-by-case review of these two facilities through the use of an EPA approved air dispersion modeling analysis in accordance with an EPA approved air dispersion modeling protocol.