

STATE OF NEW HAMPSHIRE  
DEPARTMENT OF ENVIRONMENTAL SERVICES  
AIR RESOURCES DIVISION  
CONCORD, NEW HAMPSHIRE

**NOTICE OF INTENT TO REOPEN FOR CAUSE THE TITLE V OPERATING PERMIT  
PUBLIC HEARING AND COMMENT PERIOD**

Pursuant to the New Hampshire Code of Administrative Rules, Env-A 622.02, notice is hereby given that the Director of the New Hampshire Department of Environmental Services, Air Resources Division (Director) intends to **reopen for cause the Title V Operating Permit for:**

**Public Service of New Hampshire d/b/a Eversource Energy  
Schiller Station**

Located at:

**400 Gosling Road  
Portsmouth, New Hampshire**

The New Hampshire Department of Environmental Services, Air Resources Division (DES) has reopened for cause the Title V Operating Permit for Eversource Energy's Schiller Station facility located in Portsmouth, New Hampshire. The facility includes three utility boilers: one wood and fossil fuel-fired boiler (designated as emission unit SR5) and two fossil fuel-fired boilers (designated as emission units SR4 and SR6). The facility also includes a combustion turbine, an emergency generator, primary and secondary coal crushers, coal and wood handling systems, and various insignificant and exempt activities.

On April 14, 2014, DES issued a Proposed Title V Operating Permit (Proposed Permit) to Schiller Station and submitted the Proposed Permit to United States Environmental Protection Agency (EPA) for its 45-day review period. DES did not receive a written objection to the Proposed Permit from the EPA within the 45-day review period and therefore issued the final Title V Operating Permit TV-0053 (existing Title V Permit) to Schiller Station on June 6, 2014.

On July 28, 2015, the EPA issued an Order in response to Title V Petition VI-2014-04 filed by the Sierra Club regarding the issuance of the Proposed Permit for Schiller Station. [The Order](#) granted the petition on one issue, referenced as Claim A.2, which was in regard to the Sierra Club's assertion that the sulfur dioxide (SO<sub>2</sub>) limits in the Proposed Permit were insufficient to prevent Schiller Station from interfering with maintenance of the 2010 1-hour SO<sub>2</sub> National Ambient Air Quality Standard (NAAQS) in Maine. EPA specifically directed DES to explain the applicability of Env-A 616 *Interstate Air Quality Impacts* to Schiller Station.

In response to the EPA Order, DES conducted a case-by-case review specified under Env-A 616 and determined that additional SO<sub>2</sub> emission limits are necessary to demonstrate compliance with the 1-hour SO<sub>2</sub> NAAQS. DES conducted an ambient air dispersion modeling analysis in accordance with EPA guidance to derive the SO<sub>2</sub> emission limits for SR4 and SR6. In the analysis, DES specifically used the adjusted surface friction velocity (ADJ\_U\*) modeling technique, which is an alternative modeling option. DES received EPA's approval for the use of the ADJ\_U\* modeling technique for this analysis on May 2, 2016.

In this action, DES is proposing the following changes to the existing Title V Operating Permit:

1. A new modeling-based SO<sub>2</sub> emission limitation of 0.77 pounds per million British Thermal Units (lb/MMBtu), averaged on a boiler operating day basis, for each of the utility boilers, SR4 & SR6. The new emission limit replaces the SO<sub>2</sub> emission limit of 2.4 lb/MMBtu (based on a calendar day average) in Table 5 *Federally Enforceable Operational and Emission Limitations* - Item 6 of the existing Title V Operating Permit. This emission limit will decrease the combined allowable emissions from SR4 and SR6 by 8,196 tons per year;
2. Table 7 *Monitoring/Testing Requirements* was updated by adding Item 2.e (Method of compliance) for the new SO<sub>2</sub> emission limit for SR4 and SR6;
3. Correction to the stack height of SR5 boiler in Table 2 *Stack Criteria*;
4. Removal of *Affirmative Defense for Violation of Emission Standards During Malfunction* provision (Table 5, Item 24 in the existing Title V Permit) to reflect November 20, 2015 revisions to 40 Code of Federal Regulations (CFR) 63 Subpart DDDDD *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* as it applied to SR5 boiler;
5. SR4 and SR6 boilers became subject to 40 CFR 63 Subpart UUUUU *National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units* (also known as Mercury and Air Toxics Standards or MATS) on April 16, 2016. The draft Title V Operating Permit includes all applicable MATS requirements as well as requirements from Temporary Permit TP-0157, which was issued on April 15, 2015. DES streamlined multiple applicable requirements that apply to the same emission unit(s). The most stringent limit is included in the permit;
6. Table 7 *Monitoring/Testing Requirements* was updated by adding Items 66, 67 and 68, monitoring requirements for the dry sorbent and activated carbon injection systems for SR4 and SR6;
7. On July 18, 2015, DES adopted changes to Env-A 900 *Owner or Operator Recordkeeping and Reporting Obligations*. Specifically, Env-A 907.02 no longer requires Title V sources to report and pay emission-based fees for insignificant activities. Table 9 *Recordkeeping Requirements* - Item 4 and Table 10 *Reporting Requirements* - Items 3 and 4 were updated to reflect changes to Env-A 900;
8. Table 9 *Recordkeeping Requirements* - Items 4 and 10 were updated to require the facility to maintain records of coal chloride content; and
9. Correction of typographical errors in the regulatory citations for Table 10, Item 30 *Relative Accuracy Test Audit Reports*.

DES is seeking public comments only on the sections of the Title V Operating Permit that have been proposed for revision as part of this action. The draft Title V Operating Permit, the EPA Order, DES's response to the Order, and other background information are on file with the Director, New Hampshire Department of Environmental Services, Air Resources Division, 29 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095, (603) 271-1370. Information may be reviewed at the office during working hours from 8 a.m. to 4 p.m., Monday through Friday. Additional information may also be obtained by contacting Padmaja Baru at the above address and phone number. Written comments filed with the Director no later than **Wednesday, December 14, 2016**, shall be considered by the Director in making a final decision.

A public hearing has been scheduled for **Wednesday, December 14, 2016, at the Portsmouth Public Library, Levenson Community Room, 175 Parrott Avenue, Portsmouth, New Hampshire 03801, at 6:00 p.m.**

Craig A. Wright  
Director  
Air Resources Division