



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

December 9, 2010

Mr. David B. Conroy
Chief, Air Programs Branch
US EPA New England
5 Post Office Square, Suite 100
Boston MA 02109-3912

**Re: Response to EPA's Comments on New Hampshire's Regional Haze SIP and
Proposed Administrative Rule Chapter Env-A 2300 Mitigation of Regional Haze**

Dave
Dear Mr. Conroy:

Thank you for your letter of November 22, 2010, providing comments on New Hampshire's SIP revision and proposed administrative rule for regional haze. The Department of Environmental Services (DES) understands that EPA has not had sufficient time to review the revised SIP revision in its entirety and will provide additional comments to us by December 20, 2010. We anticipate that many of your initial comments and questions will be addressed in the complete reading of the revised SIP, especially the BART analyses presented in Attachment X.

Your letter included comments in five specific areas. Our response to your initial comments is provided below in the same order in which they appeared.

1. EPA will find the five-factor analysis for BART in Attachment X. This document has been amended in response to earlier comments received from EPA and the FLM's to include further clarification and documentation in support of the BART evaluation process.
2. DES will attach the applicable permits and will quote or reference the specific language of those permits that is included in the SIP to meet BART requirements.
3. DES will replace the calendar monthly averaging period, wherever it occurs, with the 30-day rolling averaging period, and will insert the requested definition and calculation method into the SIP. In the proposed rule Chapter Env-A 2300 Mitigation of Regional Haze, the NOx performance standard for PSNH Merrimack Station Unit MK2 has been reduced from 0.37 lb/MMBtu to 0.30 lb/MMBtu. This change will be reflected in the final revision of the BART analysis submitted as part of the final SIP.
4. For PSNH Merrimack Station Unit MK2, the selection of 0.08 lb/MMBtu as the BART performance level for PM is documented in Attachment X.

5. For PSNH Newington Station Unit NT1, the selection of 0.50 lb/MMBtu as the BART performance level for SO₂ is documented in Attachment X.

As I recently discussed with you, DES intends to adhere to the original schedule to adopt Chapter Env-A 2300 with appropriate revisions in December of this year. We view this action as necessary to meet the January 15, 2011, deadline for submittal of the Regional Haze SIP. If you have any questions on this matter please contact me at (603) 271-1088.

Sincerely,



Robert R. Scott
Director
Air Resources Division

rrs/chm

cc: Anne Arnold
Anne McWilliams