State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES
6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
(603) 271-1370 FAX (603) 271-1381

October 9, 2000

Marc Driscoll
Plant Manager
Tractebel Power, Inc.
Bethlehem Power Station
1241 Whitefield Road
Bethlehem, New Hampshire 03574

CERTIFIED MAIL (7099 3400 0002 9769 7532)
RETURN RECEIPT REQUESTED

LETTER OF DEFICIENCY
ARD No. 2000-014

Dear Mr. Driscoll:

The New Hampshire Department of Environmental Services, Air Resources Division (DES) issued Title V Operating Permit TV-OP-019 (permit) to Tractebel Power for the Pinetree Power–Bethlehem facility (Pinetree) on September 15, 1999. The permit requires that specific reporting be submitted to DES in order to determine compliance with the requirements of the Title V permit.

The following deficiencies have been noted in Pinetree's efforts to meet the reporting requirements of the permit:

1. Pinetree is required by Condition X.E.8 of the permit to submit to DES an annual compliance certification that is due each April 15 for the previous calendar year. This compliance certification should contain the information specified in Condition XXIII of the permit and demonstrate the compliance status of the facility for the previous calendar year. DES has received no compliance certification for calendar year 1999 from Pinetree, which was required to be submitted by April 15, 2000. Therefore Pinetree is not in compliance with Condition X.E.8 of the permit;

2. Pinetree is required by Condition X.E.6 of the permit to submit to DES every 6 months a summary report of monitoring and testing requirements and permit deviations. The data to be reported includes monitoring and preventative maintenance results for the boiler, emergency diesel generator, pollution control devices and related stacks, and any instances of deviations from permit requirements. The semi-annual reports required to have been submitted by January 31, 2000, for the period of July through December of 1999, and July 31, 2000 for the period of January through June of 2000, have not been received. Therefore Pinetree is not in compliance with Condition X.E. 6 of the permit;

DES believes that the above-noted deficiencies can be resolved by Pinetree taking the following actions:

1) Within 30 days of receipt of this Letter of Deficiency, submit to DES the annual compliance certification that was required by Condition X.E.8 of the permit to have been submitted to DES by April 15, 2000. The compliance certification should contain the information specified in Condition XXIII of the permit and demonstrate the compliance status of the facility for calendar year 1999.

2) Within 30 days of receipt of this Letter of Deficiency, submit to DES the semiannual summary reports of monitoring and testing requirements and permit deviations that were required by Condition X.E.6 of the permit to have been submitted by January 31, 2000, for the period of July through December of 1999, and July 31, 2000 for the period of January through June of 2000.

Please address all information to Raymond Walters, at the following address:

NHDES Air Resources Division
Compliance Bureau
6 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

Please be advised that DES will continue to monitor Pinetree's compliance status and that this letter does not provide relief against any other existing or future violations. It is important that Pinetree be aware of all the requirements stipulated in their permit. Please feel free to contact DES should you have any questions regarding what is required to maintain compliance with any state air rules including permit requirements. Should you desire a current copy of the Air Resource Division rules, the rules can be obtained from the DES website at *http://www.des.state.nh.us/ard/ardrules.htm*, or by contacting the Public Information and Permitting Section at (603) 271-2975.

In the event that any future violations of these rules occur, or if no response is received, DES may take further action against Pinetree including issuing an administrative order, seeking administrative fines, and/or referring this matter to the NH Department of Justice for civil and/or criminal penalties. If you have any questions regarding this matter, or require further information please contact Raymond Walters at (603) 271-6288 or Mary Ruel at (603) 271-6795.

Sincerely,

COPY

Robert R. Scott
Administrator
Compliance Bureau
Air Resources Division

RRS/raw

cc: K. A. Colburn, Director, NHDES-ARD
G. Rule, NHDES-O/C
T. McCusker, EPA Region I
Town of Bethlehem, Board of Selectmen

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