Public Service of New Hampshire

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The Northeast Utilities System

April 22, 2010

Mr. Craig A. Wright, Assistant Director
Air Resources Division
NH Dept. of Environmental Services
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

Re: Regional Haze Draft Rule

Dear Mr. Wright:

Public Service Company of New Hampshire (PSNH) appreciates the opportunity to provide comments on the draft rule on Regional Haze, Env-A 2300. Given the impact to Merrimack Unit #2 (MK2) and Newington Unit #1 (NT1), its two largest fossil-fired electric generating units, the implementation of Regional Haze and Best Available Control Technology requirements is a very important matter for PSNH.

As requested in your letter to William H. Smagula, dated March 25, 2010, PSNH is providing the following comments on the draft rule.

Applicability: Env-A 2301.02
The applicability of Chapter Env-A 2301 should only include those units identified as BART eligible units in 40 CFR 51 Subpart P (See definitions of BART-eligible source and Existing Station facility in 40 CFR 51.301.) PSNH requests that Env-A 2301.02 be revised to specifically identify MK2 and NT1 as applicable units. Consistent with the applicability of 40 CFR 51 Subpart P, PSNH also requests that Env-A 2302.01(a) be removed.

Emission Standards Applicable to Cyclone-Firing, Wet-Bottom Boilers: Env-A 2302.01(b)
PSNH requests that Env-A 2302.01(b) be revised and clarified to refer specifically to MK2 rather than boiler type. PSNH also requests that the rule contain the emissions rates that will apply. Lastly, PSNH requests that the averaging time associated with the NOx emission rate is quarterly, rather than monthly, in order to allow the necessary flexibility to accommodate unit start-ups and shut-downs.

PSNH suggests the following language:

(b) For Merrimack Unit #2, the following emission rates shall apply beginning on July 1, 2013:

(1) SO2 emissions shall be controlled to 10 percent of the uncontrolled SO2 emission rate (90 percent SO2 removal). Compliance with this percent reduction shall be determined on a calendar month average by comparing the SO2 emission rates as measured by CEMS on the inlet and outlet of the FGD system;
(2) NOx emissions shall not exceed 0.37 lb/mmBTU. Compliance with this emission rate shall be demonstrated on a quarterly average as determined by CEMS on the outlet of the FGD system; and

(3) TSP emissions shall not exceed 0.08 lb/mmBtu. Compliance with this emission rate shall be demonstrated by conducting periodic stack tests, as specified in Env-A 2304.01(b), to measure emissions on the outlet of the FGD system.

Emission Standards Applicable to Tangential-Firing, Dry-Bottom Boilers: Env-A 2302.02
Similar to the above comment relative to emission rates for MK2, PSNH requests that Env-A 2302.02 be clarified and revised to refer specifically to NT1 and contain the NOx and TSP emission rates that will apply. With regard to the SO2 emission rate, although PSNH appreciates a lb/mmBtu emission rate rather than a percent sulfur requirement, PSNH believes that 0.50 lb/mmBtu is unnecessarily aggressive and will not result in visibility improvements that warrant the additional costs to PSNH customers.

Continuous Emissions Monitoring Systems: Env-A 2303 and Performance Testing: Env-A 2304
PSNH understands that emissions monitoring, either continuously with CEMs or periodic with stack testing, is required in order to demonstrate compliance with the emission rates contained in the rule. PSNH currently monitors SO2 and NOx emissions at Merrimack and Newington Stations continuously using CEMS which eliminates the need to conduct periodic performance testing for emissions. The performance testing requirements contained in Env-A 2304.01(a) and Env-A 2304.02(a) are redundant. With regard to the periodic stack test requirement for TSP at Merrimack Station, contained in Env-A 2304.01(b), PSNH requests that the deadlines be revised to require completion of testing by December 1st in order accommodate planned maintenance outage schedules.

In order to simplify the rule and clarify the emissions monitoring requirements, PSNH suggests Part 2303 and Part 2304 are combined into a single part and the periodic stack testing requirements are revised as follows:

(a) Periodic stack tests shall be conducted, in accordance with Env-A 802, to demonstrate compliance with the TSP emission rates contained in Env-A 2302 as follows:

(1) For MK2, when operating alone or with MK1 with combined emissions being discharged from a single stack:
   a. beginning in 2013, annually, with the initial stack test to be completed no later than December 1, 2013; and
   b. beginning in 2015, every other year, with the fourth stack test to be completed no later than December 1, 2015.

(2) For NT1,
   a. at least every 5 years and/or upon request by DES and/or EPA.

PSNH would be happy to meet with you and your staff to discuss the comments and concerns expressed above. If you have questions or require additional information, please contact me at 634-2440 or Laurel Brown, Senior Environmental Analyst, at 634-2331.

Sincerely,

Elizabeth H. Tillotson
Technical Business Manager – Generation

cc: Karla McManus, DES