



March 18, 2015

VIA ELECTRONIC MAIL

Craig A. Wright
Director, Air Resources Division
N.H. Dept. of Environmental Services
29 Hazen Drive, P.O. Box 95
Concord, NH 03302-0095
desair@des.nh.gov

Re: Application No. 14-0081, Draft TP-XXXX, Schiller Station Draft Temporary Permit for the Installation of Air Pollution Control Equipment on SR4 and SR6

Dear Director Wright:

Conservation Law Foundation (“CLF”) respectfully submits these comments on the above-referenced draft Temporary Permit (“Draft Permit”) relative to Schiller Station’s compliance with the federal Mercury and Air Toxics Standard (“MATS”), 40 C.F.R. 63 Subpart UUUUU; 77 Fed. Reg. 9,304. Compliance with the MATS rule is a crucial step toward reducing the public health threat posed by power plant emissions of acid gases, mercury, and other toxic metals.

First, the Draft Permit’s analysis of particulate matter (“PM”) emissions is incomplete. While the pollution control measures mandated under the MATS rule are intended to reduce emissions of pollutants that are precursors for fine particulate matter (“PM2.5”), those measures themselves have the potential to increase total PM emissions from the plant. The current record does not appear to provide a basis for the Department of Environmental Services (the “Department”) determination embodied in the Draft Permit that the operation of SR4’s and SR6’s MATS compliance pollution control equipment will not result in an increase in PM emissions. The application and Draft Permit lack adequate discussion of, or limits on, the sorbents or other materials that will be used to control toxic air emissions. Absent this information, and because it is not possible to accurately predict the performance of the equipment controlling PM emissions as a result of the toxic air emissions control equipment, the current record does not support a determination that no increase in the emissions rate or annual mass emissions will result.



Additionally, CLF urges the Department to reconsider its previous decisions not to require continuous monitoring of particulate matter emissions. Stack tests are not a sufficiently reliable or consistent monitoring tool for emissions that will vary widely depending on the type of coal being fired in the unit or the type of sorbent material used to control toxic air emissions.

CLF urges DES to revise the Draft Permit to address the above deficiencies.

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CLF appreciates the opportunity to comment on the Draft Permit. Please do not hesitate to contact me if you have any questions.

Sincerely,

Caitlin Peale Sloan
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Conservation Law Foundation
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