



MOUNT SUNAPEE

March 9, 2020

VIA POSTAL MAIL AND EMAIL

Craig Wright, Director
New Hampshire Department of Environmental Services
Air Resources Division
29 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

Re: Comments on Internal Combustion Engines – Emergency Generators or Fire Pump Engines
Comments (*Comments Due: March 9, 2020*)

Dear Mr. Wright:

The Sunapee Difference LLC doing business as Mount Sunapee Resort, (Mt. Sunapee) is submitting the following comments on the draft General State Permit (GSP) for *Internal Combustion Engines – Emergency Generator or Fire Pump Engines*. Specifically, Mt. Sunapee suggests changes to the definition for “emergency engines” to better align with emergency engines at ski resort operations.

The definition from Section I.C of the draft GSP states:

For the purpose of this GSP, emergency engine means a stationary internal combustion engine which operates:

1. As a mechanical or electrical power source during an emergency which is defined in Env-A 1302.17 as an unforeseeable condition that is beyond the control of the owner or operator that:
 - a. Results in an interruption of electrical power from the electricity supplier to the premises;
 - b. Requires an interruption of electrical power from the electricity supplier to the premises in order to enable the owner or operator to repair damage from fire, flood, or any other catastrophic event, natural or man-made;
 - c. Requires operation of an emergency engine to minimize damage from fire, flood, or any other catastrophic event, natural or man-made.

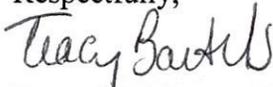
Mt. Sunapee requests the State of New Hampshire broaden the emergency engine definition to include additional emergency operating scenarios applicable to ski resort operations. Permitting Mt. Sunapee to operate its emergency engines under these scenarios will provide safer and more efficient options to evacuate guests and prevent prolonged operating disruptions. Scenarios for consideration include utilizing diesel or gasoline emergency engines to provide mechanical or electrical power in the event that:

- There is a power outage at the facility due to the electricity supplier not supplying power to the premises, damage to facility power lines, or power equipment that needs immediate repair or replacement; or
- A ski lift electric drive motor fails and/or equipment attached to or associated with the motor output shafts for drive connection (pulleys, gears, circuit boards, etc.) fail, malfunction or need immediate repair or replacement.

Mt. Sunapee also requests a definition for “catastrophic events” to better understand the applicability to ski resort operations.

If you have any questions or need more information, please feel free to contact our Environmental Compliance Manager, Mark Seltzer at 802-228-1988.

Respectfully,



Tracy Bartels, General Manager
The Sunapee Difference LLC dba Mt. Sunapee