



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

MAR 18 2015

Gary Milbury, Manager
Air Permits Program
NHDES Air Resources Division
29 Hazen Drive; PO Box 95
Concord, NH 03302-0095

Dear Mr. Milbury,

EPA has completed the review of New Hampshire Department of Environmental Services draft temporary permit for Public Service of New Hampshire's Schiller Station and has the following comment.

The proposed project consists of the installation of a dry sorbent injection (DSI) system for the purpose of complying with 40 CFR Part 63, Subpart UUUUU, National Emission Standards for Hazardous Air Pollutants; Coal and Oil Fired Electric Utility Steam Generating Units. The "Permit Application Review Summary," states the installation of the DSI system will not trigger Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NSR) requirements. However, the permit record does not fully provide the basis and calculations for determining this project is not subject to PSD/NSR. Such analysis should meet the criteria set forth in 40 CFR 52.21.

We provide these comments to help ensure the project meets federal CAA requirements, the permit will provide necessary information so the basis for the permit decision is transparent and readily accessible to the public, and the permit record provides adequate support for the decision. If you have any questions regarding this comment please contact either me (617) 918-1653 or Donald Dahl of my staff at (617) 918-1657.

Sincerely,

A handwritten signature in blue ink that reads "Ida E. McDonnell".

Ida E. McDonnell, Manager
Air Permits, Toxics, and Indoor Programs Unit