



The State of New Hampshire
Department of Environmental Services



Robert R. Scott, Commissioner

June 17, 2020

Tracy Bartels, General Manager
Mount Sunapee Resort
1398 Route 103
Newbury, NH 03255

Re: Response to Comment on the Reestablishment of a General State Permit for Internal Combustion Engines – Emergency Generators or Fire Pump Engines

Dear Ms. Bartels:

Thank you for your comment on the recently proposed General State Permit for Internal Combustion Engines – Emergency Generators or Fire Pump Engines (GSP). This letter is in response to that comment. The comment is listed below, with the New Hampshire Department of Environmental Services' (NHDES) response in italics:

Comment: 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.

Response: The use of an engine 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 premise, damage to the facility power lines, or power equipment that needs immediate replacement falls under the definition of emergency under Env-A 1302.17(a), “an unforeseeable condition that is beyond the control of the owner or operator of an emergency generator that results in an interruption of electrical power from the electricity supplier to the premises,” and thus is considered emergency use.

An engine operating in place of a ski lift where the electric drive motor fails and/or the equipment attached to or associated with the motor output shafts for drive connections fail, malfunction or need immediate repair or replacement, if due to an unforeseen condition and beyond the control of the owner or operator would also be considered an appropriate use, per Env-A 1302.17(c). This would include taking safety measures such as the evacuation of guests from the ski lift. However, continued operation of the engine beyond minimizing the damage and

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safety measures, such as continuing to use the engine to operate the ski lift to maintain normal operation, is not considered emergency use.

The regulations used by the Air Resources Division do not contain a formal definition for catastrophic events. Instead, interpretation of the phrase is expected to follow common English definitions of “catastrophic” and “events.”

Again, thank you for your comments. NHDES is always looking for ways to improve our permitting and compliance determination process. If you have any questions, please contact Todd Moore at 603-271-2822, or via email at Todd.Moore@des.nh.gov.

Sincerely,



Craig A. Wright
Director
Air Resources Division