



State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095  
(603) 271-1370 FAX (603) 271-1381

October 9, 2000



Russell F. Dowd  
Plant Manager  
Tractebel Power, Inc.  
Tamworth Power Station  
Route 41, P.O. Box 233  
West Ossipee, New Hampshire 03890

**CERTIFIED MAIL (7099 3400 0002 9769 7563)  
RETURN RECEIPT REQUESTED**

**LETTER OF DEFICIENCY  
ARD No. 2000-013**

Dear Mr. Dowd:

On March 16, 2000, the New Hampshire Department of Environmental Services, Air Resources Division (DES) performed a compliance inspection and subsequent file review of the Pinetree Power-Tamworth facility (Pinetree), operated by Tractebel Power and located in Tamworth, NH. The purpose of the inspection and file review was to evaluate compliance with Title V Operating Permit TV-OP-018 (the permit) and NH Admin. Rules Env-A 100-3600, NH Rules Governing The Control of Air Pollution.

As a result of the inspection and file review, the following deficiencies were noted:

1. Pinetree operates a diesel engine, installed in 1987 and rated at 250 horsepower and approximately 1,700,000 BTU's per hour heat input, which is used to power a portable air compressor. As of September 28, 1996, paragraph (d) of Env-A 607.01 Specific Applicability for Temporary Permits and State Permits to Operate requires that engines at a source that combusts liquid fuel for which the combined total design heat input for all such engines is greater than or equal to 1,500,000 BTU's per hour shall obtain a temporary permit prior to the construction or installation of the device. Prior to September 28, 1996, the minimum threshold for an internal combustion engine above which a permit was required was 200 horsepower. Specifically, Pinetree does not have a permit for this diesel engine and has operated in violation of Env-A 607.01(d) since the 1987 installation date of the diesel engine since both the horsepower rating and the maximum heat input of the compressor diesel exceed both the prior and current minimum thresholds of Env-A 607.01(d) beyond which a permit to operate is required;
2. Pinetree is required by Condition X.F.5 of the permit to submit to DES an annual compliance certification that is due each April 15 for the time period of the previous operating year. This compliance certification should contain the information specified in Conditions X.E.2 and XXIII of the permit and demonstrate the compliance status of the facility for the previous year. DES has received no compliance certification statement for the year 1999 from Pinetree, which was required to be submitted by April 15, 2000. Therefore Pinetree is not in compliance with Condition X.F.5 of the permit;
3. Pinetree is required by Condition X.F.6 of the permit to submit to DES every 6 months a summary report of monitoring and testing requirements and permit deviations. The data to be reported includes monitoring and preventative maintenance results for the boiler, diesel engines, pollution control devices and related stacks, and any instances of deviations from permit requirements. Although the semi-annual report required to be submitted by July 31, 2000 was received by DES on that date, the prior report which was required to have been submitted by Pinetree to DES by January 31, 2000 for the period of July through December of 1999 has not been received. Therefore Pinetree is not in compliance with Condition X.F.6 of the permit;

4. Pinetree is required by Condition X.F.1 of the permit to submit to DES an annual NOx emissions report, due each April 15, to report on NOx emissions for the previous operating year. This report should contain NOx emissions data for each fuel-burning device. DES did receive on June 19, 2000 from Pinetree the 1999 inventory of emissions that was due April 15, 2000 that included the annual NOx emissions for the wood-fired boiler and the emergency diesel generator. However, no emissions data has been submitted to DES for the compressor diesel and therefore Pinetree is not in compliance with Condition X.F.1 of the permit;
5. Pinetree is required by Condition X.E.3 of the permit to maintain records of fuel utilization and hours of operation for each fuel-burning device. Pinetree does maintain fuel usage records of wood combusted in the boiler, but does not maintain records of the fuel oil combusted in the emergency diesel generator and compressor diesel individually on a monthly basis, or the hours of operation of each device. Furthermore, Pinetree is required to maintain records of the fuel sulfur content of the oil combusted, either as provided on the delivery ticket from the fuel oil supplier, or if this is not available, by testing using ASTM methodology to show compliance with the fuel sulfur limitation provisions in Env-A 1604.01(a) for liquid fuels. Pinetree does not maintain the above records and is therefore not in compliance with Condition X.E.3 of the permit; and
6. Condition VIII.C.7 of the permit limits the number of hours that the EU-1 wood-fired boiler can be in startup or shutdown modes. Condition X.C.7 requires that Pinetree maintain records of the number of hours that the boiler is in either startup or shutdown mode, the total number of hours the boiler is in operation, and the total number of hours that the boiler is down for maintenance or repairs. Pinetree does not maintain records of the number of hours in startup or shutdown modes, or the number of hours the boiler is down for maintenance or repairs and is not in compliance with Condition X.C.7 of the permit.

DES believes that the above-noted deficiencies can be resolved by Pinetree taking the following actions:

- 1) Within 30 days of receipt of this Letter of Deficiency (LOD), submit an application to DES to amend the Title V Operating Permit TV-OP-018 to include the compressor diesel engine as an emission source;
- 2) Within 30 days of receipt of this LOD, submit to DES the annual compliance certification that was required by Condition X.F.5 of the permit to have been submitted to DES by April 15, 2000. The compliance certification should contain the information specified in Conditions X.E.2 and XXIII of the permit and demonstrate the compliance status of the facility for the calendar year 1999;
- 3) Within 30 days of receipt of this LOD, submit to DES the semiannual summary report of monitoring and testing requirements and permit deviations that was required by Condition X.6 of the permit to have been submitted to DES by January 31, 2000. The data to be reported includes monitoring and preventative maintenance results for the boiler, diesel engines, pollution control devices and related stacks, and any instances of deviations from permit requirements for the period of July through December of 1999;

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- 4) Within 30 days of receipt of this LOD, submit to DES the annual NOx emissions data for the compressor diesel that was required by Condition X.F.1 of the permit to have been submitted to DES by April 15, 2000 for the operating period of calendar year 1999;
- 5) Upon receipt of this LOD, begin keeping the fuel utilization records as required by Condition X.E.3 of the permit. Maintain the fuel usage and hourly operation records on a monthly basis and for each individual device. Maintain records of the fuel sulfur content of the oil combusted, either as provided on the delivery ticket from the fuel oil supplier, or if this is not available, by testing using ASTM methodology to show compliance with the fuel sulfur limitation provisions in Env-A 1604.01(a) for liquid fuels; and
- 6) Upon receipt of this LOD, begin keeping records of the number of hours that the boiler is in either startup or shutdown mode, the total number of hours the boiler is in operation, and the total number of hours that the boiler is down for maintenance or repairs in accordance with Condition X.C.7 of the permit.

Please address all information to Raymond Walters, at the following address:

NHDES Air Resources Division  
Compliance Bureau  
6 Hazen Drive  
P.O. Box 95  
Concord, NH 03302-0095

In the event that any future violations of these rules occur, or if no response is received, DES may take further action against Pinetree including issuing an administrative order, seeking administrative fines, and/or referring this matter to the NH Department of Justice for civil and/or criminal penalties. If you have any questions regarding this matter, or require further information please contact Raymond Walters at (603) 271-6288 or Mary Ruel at (603) 271-6795.

Sincerely,



Robert R. Scott  
Administrator  
Compliance Bureau  
Air Resources Division

RRS/raw

cc: K. A. Colburn, Director, NHDES-ARD  
G. Rule, NHDES-O/C  
T. McCusker, EPA Region I  
Town of Ossipee, Board of Selectmen