



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

April 16, 2007

Mr. Michael O'Leary, Plant Manager
Bridgewater Power Company
P.O. Box 678
Ashland, NH 03217-0678

**Re: Permit Application Request for Additional Information
Wood-fired Boiler Pollution Control Project
Bridgewater Power Company, Bridgewater, NH
Facility ID # 3300900021; Application # FY07-0068**

Dear Mr. O'Leary:

The New Hampshire Department of Environmental Services, Air Resources Division (DES) is reviewing the application filed April 10, 2007 for Bridgewater Power Company (Bridgewater) in Bridgewater, New Hampshire. DES has determined that additional information is required in order for DES to take final action on the application. The matters that DES requests Bridgewater to address are listed below. In accordance with the New Hampshire Code of Administrative Rules Env-A 607.06(b), *Application Deficiencies*, a written response to this request is required within 30 days of this notification.

The following is the list of matters DES requests that Bridgewater address:

1. In accordance with Env-A 607.01, *Specific Applicability for Temporary Permits*, in that Bridgewater is proposing the modification of a stationary source listed in Env-A 607.01(c), i.e., a device using wood with a design rating greater than or equal to 2,000,000 British thermal units per hour of gross heat input, the applicant must submit a Temporary Permit application prior to the construction or installation of air pollution control equipment for the wood-fired Boiler. The application shall contain all applicable items required under Env-A 607.03, *Application Procedures for Temporary Permits*, along with the following information:
 - a. A cover letter requesting a Temporary Permit for construction, installation, and operation of the air pollution control equipment proposed for installation (please provide general information here on the equipment proposed for installation);
 - b. A detailed description of each piece of air pollution control equipment proposed for installation, including a description of any combustion-related modifications, add-on control equipment, and any ancillary equipment (such as ammonia storage and injection systems) associated with the modification;
 - c. A process flow diagram showing the Boiler with all of the air pollution control equipment and the flow path of gaseous emissions through the various pieces of air pollution control equipment and exiting the Boiler stack, including locations of continuous emissions monitoring systems elements for NO_x, CO, O₂, and opacity;

DES Web site: www.des.nh.gov

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- d. Any new NOx emissions limitations and averaging periods that the facility may require for the purposes of qualifying for renewable energy certificates (REC);
- e. A proposed ammonia slip emission limit and demonstration of compliance with the 24-hour and annual ambient air limits (AALs) for ammonia as contained in Env-A 1400, *Regulated Toxic Air Pollutants*;
- f. If the Boiler exhaust gas temperature leaving the stack is expected to be lower than the current temperature range of 370 to 390°F, or if compliance with the ammonia AALs cannot be determined without an ambient air dispersion modeling analysis, the facility must conduct an ambient air dispersion modeling analysis or request that it be conducted by DES. If the facility is requesting DES to conduct an ambient air dispersion modeling analysis, please provide all of the information required by Env-A 606.05, *Specific Emissions Included in an Air Pollution Dispersion Modeling Impact Analysis*;
- g. Completed ARD-1 form for the facility with all emissions information included, a completed ARD-2 form for the Boiler with all emissions information (including pre-control and post-control emissions), as well as a completed ARD-3 form for the Boiler Cooling Tower with emissions information completed, including sample calculations of total dissolved solids and one of the boiler water treatment chemicals for proof of compliance with the state air toxics program contained in Env-A 1400. If no modifications are being proposed for the existing Emergency Generator, then a Form ARD-2 does not need to be re-submitted.
- h. All of the information specified in Env-A 1709, *Information Required For Title V Sources*, (this is complete, but please copy and submit it with the new application); and

If you have any questions concerning this matter, please contact Doug Laughton of the Air Resources Division, Bureau of Permitting and Environmental Health, by calling (603) 271-6893 or by email at dlaughton@des.state.nh.us.

Sincerely,



Michèle R. Andy
Air Permit Programs Manager
Bureau of Permitting and Environmental Health