NEW HAMPSHIRE DEPARTMENT OF Environmental Services

OFF-SITE FULL COMPLIANCE EVALUATION

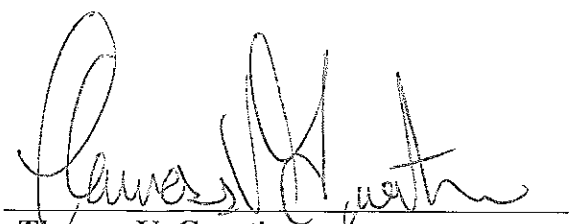
NextEra Energy Seabrook, LLC
626 Lafayette Road
Seabrook, New Hampshire, 03874
Rockingham County
(603) 773-7000

AFS # 3301500047

Final Report: May 19, 2011

Inspected and Report Prepared by:

New Hampshire Department of Environmental Services
Air Resources Division
29 Hazen Dr., P.O. Box 95
Concord, New Hampshire 03302-0095



Thomas V. Guertin
Sr. Compliance Assessment Specialist

I. Inspection

On May 19, 2011, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted an Off-site Full Compliance Evaluation ("Off-site FCE") of NextEra Energy Seabrook, LLC ("NextEra"), located in Seabrook, NH. NextEra was targeted for inspection based on DES inspection criteria, which requires that a major source with a Title V Permit be inspected once every two years.

Date/Time of Inspection:	May 20 2011
Type of Inspection:	Off-site Full Compliance Evaluation
Inspected by:	Thomas Guertin, DES Sr. Compliance Assessment Specialist
Weather:	NA
Source Contact(s):	Michael O'Leary, Licensing Manager Allen L. Legendre, Jr., Environmental Compliance Supervisor Sabre A. Gagnon, Environmental Compliance
Last compliance inspection conducted at facility: Inspection Result:	May 7, 2009, On-site Full Compliance Evaluation: NextEra failed to demonstrate compliance with Env-A 1400
Permit Number(s):	TV-OP-017 Issued: June 5, 2006; with Administrative Amendment issued on March 13, 2009 Expires: June 30, 2011

II. Facility Description

NextEra is a 1,245 megawatt net output, nuclear-powered, electric generating facility. The process uses a Westinghouse pressurized water reactor to produce heat through a controlled nuclear fission reaction. This heat is removed from the reactor through a pressurized coolant system, converted to steam, and used to drive a General Electric turbine-generator to produce electrical power. Under normal operating conditions, this primary function itself produces no significant quantity of regulated air pollutants; however, NextEra requires a number of supporting process systems that are primary sources of regulated air pollutants.

NextEra operates two auxiliary boilers for the production of process steam for various support functions, such as station heating, process steam for evaporator operations, and maintaining turbine steam seals. Sustained operation of these boilers is usually limited to facility outages when main steam system supplies are not available. Each boiler uses primarily diesel fuel, with small amounts of kerosene added in the winter to improve viscosity.

NextEra maintains four large diesel-powered emergency generators for duel redundancy (2 primary and 2 secondary) to supply power during interruptions to the grid. NextEra maintains these generators in a standby condition. NextEra also operates a number of small emergency

generators to supply power for subordinate systems.

NextEra has a Sullair diesel engine-driven air compressor that provides compressed air when the primary, electric powered air compressor is unavailable.

NextEra also has two diesel-powered fire pumps, which are not listed in the current Title V Permit. At the time the Permit was written, DES had a policy of exempting fire pump engines from permitting. That policy has now changed and the fire pump engines will need to be added to the Title V Permit at the time of renewal.

NextEra uses propane and waste oil in several space heating units for various heating applications. These units do not have sufficient heat output to exceed the permitting threshold.

This Off-site FCE consists of a review of the records submitted by the source. Consequently, no observations regarding the operations of the various devices listed in the Permit were made.

III. Emission Unit Identification and Operating Conditions

Table 1: Emission Unit Identification, Operating Restrictions and Fuel Usage Data

Emission Unit	Description	Permitted Operational Restrictions	Reported Operational & Fuel Usage Data
EU1	Auxiliary Boiler 1A Babcock & Wilcox Model #: FM10 Serial #: NB24175 Heat Rating: 105 MMBtu/hr Fuel: Diesel/Kerosene Max. Fuel Flow Rate: 750 gal/hr Install Date: 1977	Sulfur content: Diesel fuel limited to 0.4% by weight. Kerosene is limited to 0.04% by wt. Opacity: 20%	2010: 23,272 gals 2009: 159,948 gals
EU2	Auxiliary Boiler 1B Babcock & Wilcox Model #: FM10 Serial #: NB24176 Heat Rating: 105 MMBtu/hr Fuel: Diesel/Kerosene Max. Fuel Flow Rate: 750 gal/hr Install Date: 1977	Sulfur content: Diesel fuel limited to 0.4% by weight. Kerosene is limited to 0.04% by wt. Opacity: 20%	2010: 33,098 gals 2009: 73,495 gals
EU3	Emer. Generator 1A Colt Industries/	Hours of operation; 500 hr/yr	2010: 23,447 gals 2009: 17,803 gals

Table 1: Emission Unit Identification, Operating Restrictions and Fuel Usage Data			
Emission Unit	**Description**	**Permitted Operational Restrictions**	**Reported Operational & Fuel Usage Data**
	Fairbanks Morse Model #: NA Serial #: PO-206086C Rating: 8,414 hp 75.5 MMBtu/hr Fuel: Diesel Max. Fuel Flow Rate: 551 gal/hr Install Date: 1977	Sulfur content of diesel fuel limited to 0.4% by weight. Opacity: 20%	
EU4	Emer. Generator 1B Colt Industries/ Fairbanks Morse Model #: NA Serial #: PO-206086D Rating: 8,414 hp 75.5 MMBtu/hr Fuel: Diesel Max. Fuel Flow Rate: 551 gal/hr Install Date: 1977	Hours of operation; 500 hr/yr Sulfur content of diesel fuel limited to 0.4% by weight. Opacity: 20%	2010: 19,944 gals 2009: 20,745 gals
EU5	Emer. Generator 2A Cummins Model #: 2700DQLA Serial #: B04K395120 Rating: 3,741 hp 23.6 MMBtu/hr Fuel: Diesel Max. Fuel Flow Rate: 172 gal/hr Install Date: 2004	Hours of operation; 300 hr/yr Sulfur content of diesel fuel limited to 0.4% by weight. Opacity: 20%	2010: 1,837gals 2009: 2,087 gals
EU6	Emer. Generator 2B Cummins Model #: 2700DQLA Serial #: B04K395130 Rating: 3,741 hp 23.6 MMBtu/hr Fuel: Diesel Max. Fuel Flow Rate: 172 gal/hr Install Date: 2004	Hours of operation: 300 hr/yr Sulfur content of diesel fuel limited to 0.4% by weight. Opacity: 20%	2010: 2,047 gals 2009: 2,347 gals
EU7	Emer. Generator	Hours of operation: 500 hr/yr	Hour Meter Reading: NA

Table 1: Emission Unit Identification, Operating Restrictions and Fuel Usage Data			
Emission Unit	**Description**	**Permitted Operational Restrictions**	**Reported Operational & Fuel Usage Data**
	Operations Support Building ("OSB") Caterpillar Model #: 3406 Serial #: 90U3499 Rating: 345 hp 3.1 MMBtu/hr Fuel: Diesel Max. Fuel Flow Rate: 22.3 gal/hr Install Date: 1986	Sulfur content of diesel fuel limited to 0.4% by weight. Opacity: 20%	(off-site) 2010: 150 gals 2009: 45 gals
EU8	Emer. Generator General Office Building ("GOB") Komatsu/Onan Model #: 06152TA-B Serial #: 10993 Rating: 285 hp 1.95 MMBtu/hr Fuel: Diesel Max. Fuel Flow Rate: 14.2 gal/hr Install Date: 1986	Hours of operation: 500 hr/yr Sulfur content of diesel fuel limited to 0.4% by weight. Opacity: 20%	Hour Meter Reading: NA (off-site) 2010: 161 gals 2009: 116 gals
EU9	Air Compressor Sullair Model #: 50HFALDTQ Serial #: 004-144524 Rating: 275 hp 1.70 MMBtu/hr Fuel: Diesel Max. Fuel Flow Rate: 12.4 gal/hr Install Date: 2005	Hours of operation: 500 hr/yr Sulfur content of diesel fuel limited to 0.4% by weight. Opacity: 20%	2010: 357 gals 2009: 332 gals

NextEra has two fire pumps that are large enough to be listed as significant activities in the current Title V permit. At the time of the application, DES considered the fire pump engines to be exempt activities in accordance with Env-A 609.03. Since that time, DES has reversed its policy and is now requiring fire pump engines that exceed the permitting threshold in Env-A 607.01(d) to be permitted. In its current renewal application, the facility filed ARD-2 Forms for each fire pump. The data on the fire pump engines is in Table 2 below.

Table 2: Non-Permitted Fire Pump Engine Data		
	Diesel Fire Pump 1A	**Diesel Fire Pump 1B**
Manufacturer	Cummins Engine Co.	Cummins Engine Co.
Model #	N-855F	N-885F
Serial #	761-17749-2-1	761-17749-2-2
Power Rating	193 hp	193 hp
Fuel	Diesel fuel	Diesel fuel
Maximum Design Fuel Flow Rate	8 gallons/hr	8 gallons/hr
Status	Not in operation during the inspection.	Not in operation during the inspection.
Hour Meter Reading	Unknown	Unknown
Installation Date	1982	1982

Emissions:

Facility-wide emissions for calendar years 2009-2010 are included in Table 3. Facility emissions are calculated using the facility's fuel usage data, the EPA's AP-42 Emission Factors, and NOx stack test (10/11/07) data on the two auxiliary boilers. The facility emissions reported by NextEra were confirmed during this Off-site FCE.

Table 3: Facility-Wide Emissions					
	Nitrogen Oxides (tpy)	**Sulfur Dioxide (tpy)**	**Carbon Monoxide (tpy)**	**Particulate Matter -PM_{10} (tpy)**	**VOCs (tpy)**
Permitted Emission Limits	**276.85**	**378.30**	**72.17**	**9.21**	**5.43**
2010	11.25	1.78	2.94	0.26	0.27
2009	12.36	7.35	3.15	1.19	0.28

IV. Control Equipment

No air pollution control equipment is used at this source to control emissions from the devices covered by this permit.

V. Stack Criteria

The following devices at the Facility shall have exhaust stacks that discharge, without obstruction, and meet the criteria in Table 4:

Table 4 – Stack Criteria				
Stack Number	**Emission Unit or Pollution Control Equipment ID**	**Minimum Height (feet above ground surface)**	**Maximum Exit Diameter (feet)**	**Stack Orientation**
1	EU1 & EU2	142.0	8.0	Vertical
2	EU3	63.0	5.0	Vertical
3	EU4	63.0	5.0	Vertical
4	EU5	87.3	1.6	Vertical
5	EU6	87.3	1.6	Vertical
6	EU7	8.2	0.6	Vertical
7	EU8	9.0	0.4	Vertical
8	EU9	8.2	0.6	Vertical

VI. Compliance with Permitting Requirements

CHAPTER Env-A 300 – Ambient Air Quality Standards

In December, 2010, DES reviewed an ambient air quality impact analysis conducted by Areva NP, Inc., for NextEra. The results of the modeling predicted that NextEra's emissions of hydrazine and ammonia would be well below the AALs and would not cause or contribute to any violation of the NAAQS beyond the 3,000-foot exclusion zone around the facility.

CHAPTER Env-A 500 - Standards Applicable to Certain New or Modified Facilities and Sources of Hazardous Air Pollutants

NextEra is not subject to any of the New Source Performance Standards ("NSPS") specified in Env-A 503.01 or 40 CFR 60. The generator engines at NextEra were manufactured prior to the April 1, 2006 applicability date listed in 40 CFR 60, Subpart IIII.

NextEra is subject to Env-A 504.01 and the National Emission Standards for Hazardous Air Pollutants ("NESHAP"), 40 CFR 61, Subpart M, *National Emission Standard for Asbestos*, as incorporated by the requirements in Env-A 1800. See Section XIII of this report on Env-A 1800 – Asbestos Management and Control.

NextEra is not subject to any of the National Emission Standards for Hazardous Air Pollutants for Source Categories (Maximum Achievable Control Technology, or MACT Standards) specified in Env-A 505.01 or 40 CFR 63. NextEra is not subject to 40 CFR 63, Subpart ZZZZ, *NESHAP for Stationary Reciprocating Internal Combustion Engines,* because NextEra is not a major source of HAPs.

CHAPTER Env-A 600 - Statewide Permit System

On June 5, 2006, DES issued Title V Operating Permit TV-OP-017 ("the Permit") to NextEra. DES issued an Administrative Amendment to the Permit on March 13, 2009 and August 7, 2009. The Permit expires on June 30, 2011.

NextEra is a major source of NOx and SO_2 emissions and, therefore, requires a Title V Operating Permit.

Part Env-A 609 – Title V Operating Permits

Env-A 609.04 – Insignificant Activities

NextEra identified in its Title V Permit renewal application the insignificant activities listed in Table 5.

Table 5: Insignificant Activities

Device/Process	Description
Two – Clean Burn waste oil furnace space heaters Model #: CB-90BH	280,000 Btu/ hr each Equivalent to 2 gal/hr
One – Clean Burn waste oil furnace space heater Model #: CB-2800	280,000 Btu/hr Equivalent to 1.3 gal/hr
Space Heating Units/Propane	< 10 MMBtu/hr
7,000 gal. gasoline tank	Emissions - 724 lbs/year

NextEra stores gasoline on-site to fuel its various service and maintenance vehicles.

Env-A 609.08 – Application Shield

To renew the current permit and obtain application shield per Env-A 609.08, NextEra is required to submit a complete permit application to DES at least six months prior to the expiration date of the Permit. The source submitted a timely renewal application on December 22, 2010 and is under the protection of application shield.

Part Env-A 618 – Additional Requirements in Non-Attainment Areas and the New Hampshire Portion of the Northeast Ozone Transport Region

NextEra is an existing major source located in Rockingham County of New Hampshire and is in the Northeast Ozone Transport Region. Rockingham County is classified in this part as an ozone non-attainment area. NextEra is not a new major stationary source nor has it informed DES of any major modifications during the inspection review period; therefore, it is not subject to this part.

Part Env-A 619 – Prevention of Significant Deterioration ("PSD") of Air Quality Permit Requirements

NextEra is located in Rockingham County of New Hampshire, which is attainment for all criteria pollutants other than ozone. The facility is an existing major PSD source because it has the potential to emit greater than 250 tons per year of NOx and SO_2. NextEra is not a new PSD stationary source and has not informed DES of any major modifications during the inspection review period. This part is not applicable to the facility.

VII. Compliance with Permit Fee System

CHAPTER Env-A 700 - Permit Fee System

Env-A 705.04 – Payment of Emission-Based Fee

Emission-based fees are due by April 15 of the year following the emissions year. NextEra submitted timely payment of its emission-based fees for the review period, calendar years 2009 and 2010.

VIII. Source Testing and Monitoring

CHAPTER Env-A 800 - Testing and Monitoring Procedures

The Permit and Env-A 800 require NextEra to conduct compliance stack tests every three years on Auxiliary Boilers 1A and 1B, which are subject to Env-A 1211. On October 20 & 21, 2010, NOx RACT testing was conducted on Auxiliary Boilers 1A and 1B. Testing is due again in 2013. See Section X of this report for test results.

The Permit and Env-A 800 require NextEra to perform the following, every three years, on the Emergency Generators 1A, 1B, 2A, and 2B, the OSB emergency generator, the GOB emergency generator, and the Sullair Air Compressor engine:

- Set and maintain the ignition timing of the engine 4 degrees retarded relative to standard timing, provided that the ignition timing shall not be retarded beyond the point that the CO increases beyond 100 ppmdv, the turbocharger speed increases beyond the manufacturer's recommended maximum operating speed, the exhaust port temperature increases beyond the manufacturer's recommended maximum operating temperature, or the opacity of emissions is equal to or greater than 20%.
- Each engine shall have an elapsed time meter and the facility shall record the hours of operation on a monthly basis.
- The facility shall also perform gaseous concentration measurements for CO and O_2 and measure opacity from each engine,

The required tests on the equipment were most recently conducted between October 22, 2008 and March 11, 2009. See the NOx RACT section of this report. NextEra demonstrated that it meets the requirements of the Permit.

IX. Compliance with Recordkeeping and Reporting

CHAPTER Env-A 900 - Owner or Operator Recordkeeping and Reporting Obligations

Part Env-A 902 Availability of Records

Compliance with this part can only be determined during an On-site FCE; therefore, a compliance determination could not be made.

Env-A 903.03 – General Recordkeeping Requirements for Combustion Devices

NextEra is required to maintain the following records for each combustion device, on a monthly basis:

- Amount of fuel consumed;
- Type of fuel consumed;
- Sulfur content as percent sulfur by weight of fuel; and
- The concentration of the contaminants in the specification used oil.

Records retained at the facility are reviewed only during On-site FCEs. Since NextEra has reported this information in its Annual Emissions Statement, it stands to reason that the records are retained as required.

The used oil that the facility burns in its waste oil heaters is self-generated. NextEra tests its oil once per year. Test results are listed in Table 6 below.

Table 6: Specification Used Oil Analysis Results

			2009			2010		
Contaminant	**Units**	**Requirement**	VM1	VM2	PW1	HW1*	VM1	VM2
Sulfur	Wt. %	<2	0.36	0.21	0.13	0.21	0.59	0.59
Arsenic	ppm	<5	<2	<2	<2	<2	<2	<2
Cadmium	ppm	<2	<2	<2	<2	<2	<2	<2
Chromium	ppm	<10	<2	<2	<2	<2	<2	5
Flash Point	°F	>100	167	>200	>200	170	>200	>200
Lead	ppm	<60	<2	<2	21	<2	<2	29
Halogens (as HCL)	ppm	<1000	50	50	50	50	50	50
PCBs	ppm	<2	<2	<2	<2	<2	<2	<2

* PW1 was renamed HW1 in 2010

The analysis performed by NextEra confirms conformance to the requirements with the exception of Sulfur Weight % which was not reported in 2010. NextEra said that due to a third party laboratory omission, samples for 2010 were not analyzed for sulfur content. This omission has been addressed for future sample analysis. The laboratory retained the sample and will be able to complete the missing analysis.

Part Env-A 905 – NO_x Emission Statements Recordkeeping Requirements

Since NextEra emits greater than 10 tons per year of NOx, it is subject to this part and is required to maintain the following records:

- Identification of each combustion device
- Operating schedule during the high ozone season for each combustion device, including:
  - The typical hours of operation per day;
  - The typical days of operation per calendar month;
  - Number of weeks of operation; and
  - Heat input rate in million Btu per hour.
- The following NOx emission data:
  - Actual calendar year NOx emissions, in tons, from each NOx-emitting device; and
  - Typical high ozone season day NOx emissions, in pounds per day, from each NOx-emitting device.

Similarly, this inspection entails an off-site review of the records submitted by NextEra. Any records retained at the NextEra facility could not be verified.

Part Env-A 907 – General Reporting Requirements

NextEra is required to submit several reports to DES to meet the requirements of its Permit and those of Administrative Rules Env-A 100 *et. seq.* For a complete assessment of the NextEra facility's reporting status, see *Appendix 1 - Full Compliance Evaluation Records Review.*

The Annual Compliance Certification for 2010 was due at DES on or before April 15, 2011. The report was received on April 19, 2011 (see also section XIV of this report).

NextEra was late submitting its Annual Compliance Certification for 2010.

Part Env-A 909 – NOx Emission Statements Reporting Requirements

NextEra has actual emissions greater than 10 tons per year and, therefore, is required to submit annual NOx Emission Statements. NextEra is submitting NOx Emissions Statements as part of its Annual Emissions Reports as required, however, DES has determined that these reports are incomplete.

NextEra failed to include the following information in its NOx Emissions Statements:

1. ***Actual hours of operation per calendar month;***
2. ***Actual days of operation per calendar month; and***
3. ***Actual number of weeks operated per calendar year.***

Part Env-A 911 – Recordkeeping and Reporting Requirements for Permit Deviations

NextEra is aware of the recordkeeping and reporting requirements for Permit Deviations. DES has recently requested that NextEra submit a permit deviation for failing to submit its 2010 Annual Compliance Certification required by its Title V permit by the April 15th 2011 due date.

X. Compliance with RACT

CHAPTER Env-A 1200 – Prevention, Abatement, and Control of Stationary Source Air Pollution

Part Env-A 1204 - Stationary Sources of VOCs

NextEra has no devices or processes that are subject to Reasonably Available Control Technology ("RACT") requirements for VOCs. NextEra does not have the potential to emit VOCs equaling or exceeding 50 tons during any consecutive 12-month period; therefore, it is not subject to this part.

Part Env-A 1211 - Nitrogen Oxides

The auxiliary boilers at NextEra are subject to control requirements in Env-A 1211.12. NextEra is required to comply with a NOx emissions rate limit of 0.20 lb/MMBtu, based on a 24-hour calendar day average. On October 20 and 21, 2010, NextEra conducted a stack test on the auxiliary boilers. See Table 7 for stack test results. Based on the results of the testing, DES determined that NextEra meets the requirements of this part.

Table 7: Stack Test for NOx

Device Tested	Permit Limit in Lb/MMBtu	Result in Lb/MMBtu
EU1, Auxiliary Boiler 1A	0.20	0.137
EU2, Auxiliary Boiler 1B	0.20	0.135

The emergency generators at NextEra have combined theoretical potential emissions that exceed the NOx emission standard of 25 tons in any consecutive 12-month period and, therefore, are subject to the NOx RACT provisions of Env-A 1211.11. Env-A 1211.11 requires NextEra to set and maintain the ignition timing of each engine 4 degrees retarded relative to standard timing, provided that the ignition timing shall not be retarded beyond the point that CO emissions exceed 100 ppmdv. The ignition timing on NextEra's emergency generators is not capable of manual adjustment. When the permit was issued, electronic timing

was not commonly used for these types of engines. DES has since updated the NOx RACT rule (now in Env-A 1300) and has included provisions for internal combustion engines that do not have manual adjustment capabilities. Based on these circumstances, DES has determined that NextEra will not be required to manually adjust the timing of the aforementioned devices.

XI. Compliance with Toxics Regulations

CHAPTER Env-A 1400 – Regulated Toxic Air Pollutants ("RTAPs")

NextEra emits sulfur hexafluoride, ethylene glycol, ethanolamine, hydrazine, ammonia, sulfuric acid and sodium hydroxide, which appear on the list of RTAPs in Table 1450-1 of Env-A 1400. All of these compounds fall below the annual de minimis levels except for hydrazine and ammonia. As stated previously, modeling was conducted for hydrazine and ammonia in December, 2010. The results of the modeling predicted that NextEra's emissions of hydrazine and ammonia would be below the AALs and would not cause or contribute to any violation of Env-A 1400 beyond the exclusion zone, which has historically been used as the compliance boundary.

Env-A 1400 was most recently updated on February 18, 2011. The source is reminded that it is required to perform a compliance demonstration by May 18, 2011 (90 days from date of issue) to maintain compliance with this rule.

NextEra uses three used-oil furnaces. The used oil burned is self-generated. NextEra tests its used oil annually and has shown it to be compliant (See Table 6). NextEra's used-oil furnaces meet the established criteria and, therefore, the source meets the requirements of Env-A 1405.

The fuel-burning devices that burn virgin fuels are exempt from Env-A 1400.

XII. Compliance with Process/Particulate/Opacity Regulations

CHAPTER Env-A 1600 - Fuel Specifications

Env-A 1603.01 – Applicable Liquid Fuels

NextEra uses diesel fuel in the emergency generators.

NextEra uses diesel fuel/kerosene in the auxiliary boilers. Kerosene is used as an additive during the months of November through February (2.3 parts oil to 1 part kerosene).

NextEra is using self-generated used oil in three used-oil furnaces.

Env-A 1604.01 – Maximum Sulfur Content Allowable in Liquid Fuels

Env-A 1604.01 and the Permit limit the sulfur content of #2 fuel oil to 0.4% sulfur by weight,

and the sulfur content of kerosene to 0.04% sulfur by weight. NextEra uses ultra low sulfur diesel fuel for the devices that use #2 fuel oil, #2 fuel oil/kerosene, or diesel fuel. Ultra low sulfur diesel fuel by definition has a maximum sulfur content of 0.0015% by weight. NextEra certifies in its annual emission statements that the sulfur content of the fuel oils being used meet these requirements.

CHAPTER Env-A 2000 - Fuel Burning Devices

Env-A 2002.02 – Visible Emission Standard for Fuel Burning Devices Installed After May 13, 1970

Env-A 2002.02 and the Permit limit the emissions from the boilers at this facility to 20% opacity. As this was an Off-site FCE, visual emissions could not be observed.

Env-A 2002.07 – Particulate Emission Standards for Fuel Burning Devices Installed After May 13, 1970 but Before January 1, 1985; and

Env-A 2002.08 – Particulate Emission Standards for Fuel Burning Devices Installed On or After January 1, 1985

Compliance with the established emission standards for the fuel burning devices can only be determined through stack testing, which has not been required of this source, to date.

XIII. Compliance with other Miscellaneous Provisions

CHAPTER Env-A 1800 – Asbestos Management and Control

This Chapter is applicable when facilities perform renovations involving asbestos or demolition. Between 2010 and 2011, NextEra did not notify DES that it conducted any projects involving the removal of asbestos.

CHAPTER ENV-A 3200 – NOx Budget Trading Program

NextEra receives allowances for being a non-emitter under the NOx Budget Trading Program. The facility has a bank of allowances, which have not been traded or sold. The DES Emissions Trading Program Manager reviews this information as it is received and accounts for it accordingly. No compliance issues have been identified regarding this Chapter.

CHAPTER Env-A 3800 – Voluntary Greenhouse Gas Emissions Reduction Registry

NextEra voluntarily chose to report its greenhouse gas emissions to the State of New Hampshire for the years 1991 to 2002. Since then, NextEra has participated in EPA's Federal voluntary greenhouse gas program.

XIV. Compliance With Applicable Federal Rules

40 CFR 68 Chemical Accident Prevention Provisions

To comply with this regulation, NextEra has a Spill Prevention, Control and Counter-measure ("SPCC") Plan which was last revised in August 2008.

40 CFR 70.6 (a)(3) Permit Content, Monitoring, Record Keeping, and Reporting Requirements

NextEra failed to submit its Annual Compliance Certification to DES prior to the due date of April 15, 2011. See section IX, Env-A 907-General Reporting Requirements, for more detail. A complete review of the facility's reporting status is listed in Appendix 1 of this report.

40 CFR 82, Subpart F, Protection of Stratospheric Ozone, Recycling and Emission Reduction

This regulation requires that no person servicing, maintaining, repairing, or disposing of appliances may knowingly vent or otherwise release into the environment any refrigerant or refrigerant substitute from such appliances. NextEra has trained technicians on-site to handle the maintenance and disposal of appliances that contain refrigerants.

XV. Enforcement History and Status

On January 14, 2011, DES issued a Notice of Past Violation ("NPV") to NextEra for late submission of its Env-A 1400 Toxics Demonstration.

XVI. Conclusions & Recommendations

The following deficiencies were identified during the inspection:

NextEra was late submitting its Annual Compliance Certification for 2010. The report was due at DES on or before April 15, 2011. It was not received until April 17, 2010.

NextEra failed to include the following information in its annual NOx Emissions Statements for 2009 and 2010:

- ***Actual hours of operation per calendar month;***
- ***Actual days of operation per calendar month; and***
- ***Actual number of weeks operated per calendar year.***

The following is recommended to return the facility to compliance:

- Submit to DES the sulfur content of the specification used oil for 2010 (analysis from

retained sample). Include in future semi-annual reports the results of the analysis for sulfur content of the specification used oil.

- Submit future Annual Compliance Certifications so that they are received by DES prior to the April 15th deadline.
- Include in its annual NOx emission statements the missing information as specified above.

Appendix 1: Full Compliance Evaluation Records Review

Facility: **NextEra Energy NextEra, LLC**
Date of FCE: **April 30, 2011**
Reviewer: **Thomas Guertin**

Annual Emission Reports (incl. NOx, VOC etc.):

Reporting Period	When Rec'd	Report OK	In Database
2010	4/13/11	No	Yes
2009	4/15/10	No	Yes

Annual Emissions-Based Fee Payments:

Reporting Period	When Rec'd	In Database
2010	4/13/11	Yes, in DES Emission Section's Spreadsheet.
2009	4/15/10	Yes, in DES Emission Section's Spreadsheet.

TV Annual Compliance Certifications:

Reporting Period	When Rec'd	Report OK	In Database
2010	4/19/11	**Yes-Late**	Yes
2009	4/15/08 7/07/08 (Revised)	Yes	Yes

TV Semi-Annual Permit Deviation and Monitoring Reports:

Reporting Period	When Rec'd	Report OK	In Database
Jul – Dec 2010	1/31/11		
Jan – Jun 2010	7/22/10		
Jul – Dec 2009	2/01/10 3/31/10 Revision	Yes	Yes
Jan – Jun 2009	7/24/09 3/09/10 Revision	Yes	Yes

Individual Permit Deviations Reports:

Reporting Period	When Rec'd	Report OK	In Database
None.			

Quarterly Continuous Emission Monitoring Excess Emission Reports (CEM EERs):

Reporting Period	When Rec'd	Report OK	In Database
None.			

CEM Audits (OPAs, CGAs, RAAs, RATAs):

Reporting Period	Report Type	When Rec'd	Report OK	In Database
Not applicable.				

Stack Tests:

Stack Test Date	Device Tested	When Rec'd	Report OK	In Database
10/20/2010	Auxiliary Boiler 1A	12/03/2010	Yes	Yes
10/21/2010	Auxiliary Boiler 1B	12/03/2010	Yes	Yes

Other reports:

Reporting Period	Report Type	When Rec'd	Report OK	In Database
None.				