



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
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BOSTON, MA 02109-3912

DEC 14 2016

Mr. Craig A. Wright
Director, Air Resources Division
New Hampshire Department of Environmental Services
29 Hazen Drive
Concord, New Hampshire 03302-0095

Dear Mr. Wright:

EPA has concluded its review of the Eversource - Schiller Station Draft Title V Operating Permit (Permit No: TV-0053), as reissued on November 9, 2016. We appreciate the timely notice on the issuance of the draft permit and the opportunity to participate in the public comment process.

This permit has been reopened for cause as a result of EPA's July 28, 2015 Order responding to the Title V Petition (Petition No: VI-2014-04), which found Env-A 616, as adopted into the New Hampshire State Implementation Plan, to be an applicable requirement for the Schiller Station Title V Operating Permit.

EPA has reviewed the technical and procedural methods by which the New Hampshire Department of Environmental Service (NHDES) used to address the case-by-case requirements of Env-A 616. We find the NHDES's response adequately addresses EPA's July 2015 Order.

Specifically, we find that the air quality modeling analysis used by NHDES to support the draft sulfur dioxide (SO₂) emission limits for Schiller Station appropriately follows EPA modeling guidance. The draft emission limits, which represent a 68% decrease in allowable SO₂ emissions (when compared to the current limit), are protective of the 1-hr SO₂ National Ambient Air Quality Standard both within state boundaries and in neighboring states.

EPA has no adverse comments to the Eversource - Schiller Station Draft Title V Operating Permit. We look forward to receiving the proposed permit and NHDES's response to any comments which may be lodged during the public comment process. Please note that the EPA review period will begin once the proposed permit is issued.

If you have any questions, please do not hesitate in contacting Patrick Bird of my staff at bird.patrick@epa.gov or (617) 918-1287.

Sincerely,

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

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

Cc: Marc Cone, Maine Department of Environmental Protection
Dana Lee, Town of Eliot, Maine
Zachary Fabish, Sierra Club
William Smagula, Eversource Energy

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