



**PSNH Running Scrubber Through MK 1**

**Melissa Hoffer** to: Mark Stein

10/25/2011 10:07 AM

From: Melissa Hoffer <MHoffer@clf.org>

To: Mark Stein/R1/USEPA/US@EPA

History: This message has been forwarded.

Mark:

Gary Milbury works in DES's Air Resources Division and has been very involved with the scrubber permitting. Based on his statements below, it appears that PSNH continuously has been running MK1 through the scrubber (not just for testing) since September.

One of our staff members also reports seeing exhaust being continuously emitted from the new stack, which would be consistent with continuous operation of the scrubber.

We remain very concerned that the unit is being operated without a NPDES permit, and without a clear picture of how the wastewater is being handled.

Best,  
Melissa

-----Original Message-----

From: Milbury, Gary [mailto:Gary.MilburyJr@des.nh.gov]

Sent: Monday, October 24, 2011 10:58 AM

To: Arthur B. Cunningham

Cc: Corkery, Catherine; Monroe, Pamela

Subject: RE: DES Website Links for PSNH Merrimack Station Documents

Art,

Based on information from our testing/CEM engineers, PSNH started running unit MK1 through the scrubber in September, but they have not started running Unit MK2 through the scrubber.

When they do start operating Unit MK2 through the scrubber, it will obviously take some time to optimize the scrubber and associated equipment so as to maximize the SO2 and mercury emissions reductions (which they have until July 1, 2013 to achieve). Also, new CEMS still need to go through accuracy audits so this data can be certified. When the commissioning process is completed, the actual impact of the scrubber on emissions, electrical load, steam flow, heat input rate, etc. can then be accurately evaluated.

Table 9, Item 6 (on page 74) of the Title V Operating Permit requires the facility to report the pollutants monitored by the continuous emissions monitors (CEMS) on a quarterly basis. This "quarterly CEM report" includes data for opacity, SO2, NOx and CO2 emissions (as well as other operational data) and must be submitted within 30 days of the end of each calendar quarter. The specific data required for the quarterly report is contained in Item 6 and includes data on load, heat input rate, and steam flow. Coal quality data is also submitted in a quarterly report

pursuant to Table 9, Item 11 of the Title V Operating Permit.

Pollutants not measured directly by the CEM (PM, CO, and VOC), along with the pollutants mentioned above are reported annually per Table 9, Item 22.

The report is due by April 15 for the previous calendar year.

You also asked when the draft emissions report will be available. This is an off-site compliance evaluation that the Compliance Bureau conducted, so you'll need to check with Pam on when it will be finalized.

Gary

Gary Milbury  
Air Permit Programs Manager  
NH Department of Environmental Services  
Air Resources Division  
phone: (603) 271-2630  
fax: (603) 271-1381  
email: gary.milbury@des.nh.gov