



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

Thomas S. Burack, Commissioner

DE 08-051



July 3, 2008

Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

**Re: Full Certification as a Class III Renewable Energy Source
Pinetree Power, Inc.
Tamworth, NH**



Dear Ms. Howland:

In a previous letter to the New Hampshire Public Utilities Commission (PUC), the New Hampshire Department of Environmental Services (DES) recommended that PUC conditionally certify Pinetree Power, Inc. for their wood-fired power plant located in Tamworth, NH (Pinetree Power – Tamworth) as a Class III renewable energy source. DES recommended that Pinetree Power – Tamworth complete installation of a emission NOx control system and perform emissions tests for total suspended particulate (TSP) in order to obtain full certification. Pinetree Power - Tamworth has installed NOx controls and tested emissions as recommended by DES. NOx continuous emissions monitor (CEM) data and TSP test results indicate that Pinetree Power - Tamworth can meet the Renewable Portfolio Standards (RPS) requirements and DES recommends that PUC fully certify Pinetree Power – Tamworth as a Class III renewable energy source eligible to generate renewable energy certificates. A description of the NOx control installation and TSP testing performed and DES's review of the results is presented below.

In our letter dated April 18, 2008, DES recommended to PUC that Pinetree Power – Tamworth perform the tasks noted in italics below prior to being granted full certification as a Class III renewable energy source eligible to generate renewable energy certificates:

- 1) *Pinetree Power – Tamworth shall lower its NOx emissions to meet the 0.075 lb/MMBtu RPS. Pinetree has proposed to accomplish this by installing and operating the NOx emission controls specified in Temporary Permit TP-B-0543.*

DES issued Temporary Permit TP-B-0542 to Pinetree Power – Tamworth on March 17, 2008. Pinetree Power – Tamworth installed the NOx emission control devices immediately thereafter.

On April 18, 2008, Pinetree Power – Tamworth performed Relative Accuracy Test Audit (RATA) on the CEM system. DES personnel were on-site to witness this testing. The testing indicated that the modified CEM was functioning properly. CEM data indicates that the NOx emissions from the facility meet the 0.075 lb/MMBtu RPS.

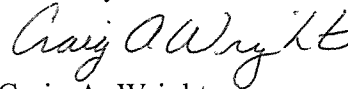
- 2) *Pinetree Power – Tamworth shall perform emissions tests for TSP in accordance with the procedures specified in Env-A 800 and schedule required by Puc 2505.05(c):*

On April 18, 2008, Pinetree Power – Tamworth performed an emission test for TSP. DES personnel were on-site to witness this testing. The testing indicated a TSP emission rate of 0.005 lb/MMBtu, which meets the 0.02 lb/MMBtu RPS.

Pinetree Power – Tamworth has successfully fulfilled the conditions which DES recommended to PUC in our initial review. Based upon review of Pinetree Power – Tamworth's original application and oversight and review of the tasks noted above, DES believes that Pinetree Power – Tamworth meets the requirements to be certified as a Class III renewable energy source eligible to generate renewable energy certificates. DES recommends that PUC fully certify Pinetree Power – Tamworth as a Class III renewable energy source.

If you have any questions regarding DES's evaluation of the application or our conclusions, please contact Todd A. Moore of the Permitting and Environmental Health Bureau at todd.moore@des.nh.gov or (603) 271-6798.

Sincerely



Craig A. Wright
Assistant Director
Air Resources Division

Cc: David J. Shulock, Esq., Brown, Olson & Gould
Russell Dowd, Pinetree Power, Inc.