



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**

DE08-024



**Thomas S. Burack, Commissioner**

June 4, 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.  
Bethlehem, 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 Bethlehem, NH (Pinetree Power – Bethlehem) as a Class III renewable energy source. DES recommended that Pinetree Power – Bethlehem perform emissions and monitoring equipment testing in order to obtain full certification. Pinetree Power - Bethlehem has tested emissions and monitoring equipment as recommended by DES. The test results indicate that Pinetree Power - Bethlehem can meet the Renewable Portfolio Standards (RPS) requirements and DES recommends that PUC fully certify Pinetree Power – Bethlehem as a Class III renewable energy source eligible to generate renewable energy certificates. A description of the testing performed and DES's review of the results is presented below.

In our letter dated March 7, 2008, DES recommended to PUC that Pinetree Power – Bethlehem 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 – Bethlehem shall obtain a Temporary Permit to install NOx emission control devices, and install and operate those devices to meet the quarterly NOx RPS standard of 0.075 lb/MMBtu.*

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

- 2) *Pinetree Power – Bethlehem shall:*

- a) *complete proposed modifications to the NOx CEM;*

Pinetree Power – Bethlehem modified the NOx CEM system during installation of the NOx control equipment. The NOx CEM modifications were performed during the week of March 26, 2008.

- b) perform a cylinder gas audit within 7 days of completion of the modifications;
- c) have a traverse performed by a qualified tester within 7 days of completion of the modifications; and
- d) perform a RATA by May 31, 2008.

Pinetree Power – Bethlehem performed a cylinder gas audit, stack traverse, and RATA on March 28, 2008. DES personnel were on-site to witness this testing. The testing indicated that the modified CEM was functioning properly.

- 3) Pinetree Power – Bethlehem shall perform an emission test for TSP in accordance with Env-A 800, Testing and Monitoring Procedures.

Pinetree Power – Bethlehem performed an emission test for TSP on March 28, 2008. DES personnel were on-site to witness this testing. The testing indicated a TSP emission rate of 0.015 lb/MMBtu, which meets the RPS standard of 0.02 lb/MMBtu.

Pinetree Power – Bethlehem has successfully fulfilled the conditions which DES recommended to PUC in our initial review. Based upon review of Pinetree Power – Bethlehem's original application and oversight and review of the tasks noted above, DES believes that Pinetree Power – Bethlehem 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 – Bethlehem 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](mailto: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  
Mark Driscoll, Pinetree Power, Inc.  
Herb Dodge, Pinetree Power, Inc.