



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



**Thomas S. Burack, Commissioner**

April 7, 2015

NHPUC 8APR'15PM4:20

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

**Re: Conditional Certification as a Class III Renewable Energy Source  
Bridgewater Power Company  
Bridgewater, NH  
Docket DE 14-209; GIS Unit ID #: MSS357**

Dear Ms. Howland:

The New Hampshire Department of Environmental Services (DES) has reviewed the 6-month progress report submitted by the American Lung Association of the Northeast (ALANE) on behalf of Bridgewater Power Company (BPC), a wood-fired power plant located in Bridgewater, NH, as a condition of BPC's alternative plan to be certified as a Class III renewable energy source. DES recommends that the Public Utilities Commission (PUC) grant continued conditional approval to BPC as a Class III renewable energy source eligible to generate renewable energy certificates.

**Facility Description**

**Facility Name:** Bridgewater Power Company  
**Facility Location:** Route 3, Bridgewater, NH  
**Gross Nameplate Capacity:** 15 MW  
**Primary Fuel:** Whole-tree wood chips and other low-grade clean wood fuels

**Particulate Matter (PM) Emissions**

As stated in the PUC's letter dated September 15, 2014, a biomass facility otherwise meeting Class III eligibility requirements, but unable to achieve PM emission requisites may consult with DES and submit a plan to meet an alternative requirement. DES has reviewed the 6-month progress report required as part of the Plan and has determined that BPC is in compliance with the Plan at this time.

**Nitrogen Oxides (NOx) Emissions**

New Hampshire Code of Administrative Rules Puc 2502.16 requires that the facility meet a quarterly average NOx emission rate limit of 0.075 lb/MMBtu.

Based on a review of fourth quarter 2014 data, DES anticipates that future NOx emissions from the facility will meet the RPS NOx standard of 0.075 lb/MMBtu or less.

At the end of each quarter of operation and electricity generation, DES will review BPC's operational and testing data, which will indicate if BPC operates the NOx CEMS in accordance with all applicable requirements, and the CEMS data is suitable for determining compliance with NOx emission limitations.

**Conclusion and Recommended Conditions of Approval**

DES believes that BPC will meet the requirements to be certified as a Class III - Existing Biomass renewable energy source. DES recommends that, with the following conditions, the PUC certify BPC as a Class III renewable energy source eligible to generate renewable energy certificates:

- 1) BPC shall emit NOx at a quarterly average rate less than or equal to 0.075 lb/MMBtu.
- 2) BPC shall continue to comply with the Plan for an alternative PM requirement.

If you have any questions, please contact me at [joseph.fontaine@des.nh.gov](mailto:joseph.fontaine@des.nh.gov) or (603) 271-6794.

Sincerely



Joseph T. Fontaine  
Trading Programs Manager  
Air Resources Division