



STATE OF NEW HAMPSHIRE
OFFICE OF THE GOVERNOR

MARGARET WOOD HASSAN
Governor

December 23, 2016

H. Curtis Spalding, Regional Administrator
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Re: Designation of Attainment/Attainment-Unclassifiable for the 2010 SO₂ NAAQS for portions of New Hampshire

Dear Mr. Spalding:

In July 2011, pursuant to Section 107(d)(1)(A) of the Clean Air Act (CAA), New Hampshire presented the EPA with a recommendation for designation of a portion of the state to the 2010 1-hour Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS). As a result of that correspondence, 13 New Hampshire towns and one city located within three contiguous counties were designated the Central New Hampshire Nonattainment Area¹. The Environmental Protection Agency stated in the final rule that it intended "...to address in separate future actions the designations for all other areas for which the agency is not yet prepared to issue designations..."². For New Hampshire, this meant that portions of the state that were not included in the Central New Hampshire Nonattainment Area would be reviewed and designated at a later time.

Pursuant to 40 CFR Part 51 Subpart BB Data Requirements for Characterizing Air Quality for the Primary 2010 SO₂ 1-hour NAAQS, the New Hampshire Department of Environmental Services (NHDES) submitted in January 2016 a list of stationary SO₂ emission sources that have been identified as requiring further air quality characterization: Public Service of New Hampshire d/b/a Eversource Energy, Schiller Station (Schiller) and Newington Station (Newington). These two energy generating units are located in Portsmouth and Newington, New Hampshire respectively. These emission sources have been monitored and modeled and are demonstrating, through the establishment of federally enforceable permit conditions, that southeastern New Hampshire (including portions of Rockingham County and all of Strafford County) is eligible for designation as attainment with the 2010 SO₂ 1-hour NAAQS.

¹ 78 FR 47191

² Ibid.

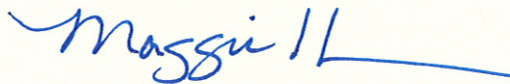
The remaining portion of the state, including seven full counties (Belknap, Carroll, Cheshire, Coos, Grafton, Strafford and Sullivan) and two partial counties (Merrimack and Hillsborough) do not have emission sources large enough (greater than 2,000 tons per year of SO₂ emissions) to require further characterization and thus are eligible for a designation classified as attainment/unclassifiable.

In accordance with Section 107(d) of the Clean Air Act, I hereby recommend that portions of southeastern New Hampshire be designated as attainment and that the remaining portion of the state, not already designated as attainment or nonattainment, be designated as attainment/unclassifiable for the 2010 1-hour primary National Ambient Air Quality Standard (NAAQS) for SO₂ (see enclosed map and table).

My designation recommendation is supported by the most recent monitoring data and is in accordance with the June 22, 2010, final rule (75 FR 33520) and March 20, 2015, memorandum titled "Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard." The final rule and memorandum direct states to submit their recommendations to EPA, designating all areas in the state based on a review of five factors: air quality data, emissions-related data, meteorology, geography/topography and jurisdictional boundaries. The New Hampshire Department of Environmental Services has prepared the attached rationale supporting this recommendation.

Thank you for your consideration of my recommendations. If you have any questions regarding this determination, please contact Craig Wright, Director, New Hampshire Department of Environmental Services, Air Resources Division, at (603) 271-1088.

With every good wish,



Margaret Wood Hassan
Governor

Enclosures

cc: Thomas S. Burack, Commissioner, NHDES
Jeffrey T. Underhill, NHDES
David Conroy, USEPA Region 1
Donald Dahl, USEPA Region 1

Figure 1. Proposed New Hampshire Designations, 2010 Sulfur Dioxide 1-hour NAAQS

