



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
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February 24, 2003

Leonard J. Ariagno  
Somerset Power, LLC  
Somerset Operations, Inc.  
1606 Riverside Avenue  
Somerset, Massachusetts 02726

RE: **CONDITIONAL APPROVAL**

Application for: BWP AQ 02  
Non-Major Comprehensive Plan Applications  
310 CMR 7.02 Plan Approval and Emission Limitations  
Transmittal Nos.: W025199 & W025550  
Application Nos.: 4B02023 & 4B02003  
Source Number: 0060  
Action Code: E-V6

AT: Somerset Operations, Inc.  
1606 Riverside Avenue  
Somerset, Massachusetts 02726

Dear Mr. Ariagno:

The Department of Environmental Protection (the "Department"), Bureau of Waste Prevention, has reviewed two Non-Major Comprehensive Plan Applications, submitted by Somerset Power, LLC (the "Applicant"), for proposed modifications to the Somerset Operations, Inc., Somerset Station ("Facility") located at 1606 Riverside Avenue, Somerset, Massachusetts. Proposed modifications to the Somerset Station include alterations to existing Unit 6/Boiler 8 coal fired electric utility generating unit and the replacement of the inactive coal pile sound barrier with a permanent sound wall. The application concerning the Unit 6/Boiler 8 modifications bears the seal and signature of John M. Kingsley, P.E. No. 41029; and the application concerning the sound wall modifications bears the seal and signature of Paul Farrington, P.E. No. 32619.

The proposed alteration of Unit 6/Boiler 8 entails the construction of a natural gas reburn system. The Department on June 7, 2002 issued an Emission Control Plan (ECP) Final Approval that defined how Somerset Power, LLC would come into compliance with 310 CMR 7.29 Emission

This information is available in alternate format. Call April McCabe, ADA Coordinator at 1-617-556-1171. TDD Service - 1-800-298-2207.

DEP on the World Wide Web: <http://www.mass.gov/dep>

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Standards for Power Plants. The ECP Final Approval and 310 CMR 7.29 required that Somerset Power, LLC submit to the Department an application pursuant to 310 CMR 7.02 Plan Approval and Emission Limitations for alterations/construction of the natural gas reburn project.

The Department is of the opinion that the material submitted is in conformance with the current Massachusetts Air Pollution Control Regulations and hereby issues this Conditional Approval for the proposed alterations of the facility, subject to the conditions and provisions stated herein.

The application was submitted in accordance with Section 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control Regulations", adopted by the Department pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-M. The Department's review has been limited to compliance with applicable Air Pollution Control Regulations and does not relieve you of the obligation to comply with all other permitting requirements contained in other regulations or statutes.

This Conditional Approval combines and includes: the 310 CMR 7.02 Comprehensive Plan Approval; the 310 CMR 7.00: Appendix A: Emission Offsets and Nonattainment Review analysis; and the Code of Federal Regulations, Title 40, Part 52.21 Prevention of Significant Deterioration (PSD) analysis, and hereby incorporates the Non-Major Comprehensive Plan Application submitted by Somerset Power, LLC (the "Applicant") by reference, including the June 7, 2002 ECP Final Approval.

A Public Notice was published, in the Boston Globe and the Fall River Herald News on January 17, 2003, the commencement date of the mandatory thirty (30) day public comment period. The Department held a Public Hearing at the Southeast Regional Office on February 18, 2003 to receive public comment on the Department's Proposed Conditional Approval and during Public Hearing the Department extended the hearing record for written testimony until February 21, 2003. No oral testimony was received at the Public Hearing and one (1) written testimony was received; no other public comments were received between January 17, 2003 through February 21, 2003.

This Conditional Approval will allow for commencement of proposed alterations of the facility and its operation, including without limitation, installation of all equipment and tie-ins of the gas reburn equipment, and provides information on the project description, emission control systems, facility limits, continuous emission monitors, record keeping, reporting and testing requirements. The Department acknowledges that after December 19, 2002, some minor construction activities (hangers, pipes, ducts, electric lines, etc.) occurred with no actual tie-ins made with the existing equipment. The minor construction activities were authorized by the Department, to allow for the timely tie-ins of equipment components during the March 2003 maintenance outage of Unit 8/Boiler 6 as scheduled with ISO New England, Inc., and to realize the environmental benefits of displacing approximately 15% of the coal heat input with natural gas, as early as possible.

Enclosed is a stamped approved copy of the two applications. A list of submitted information pertinent to the applications is delineated on page 22 of 23.

Should you have any questions concerning this matter, please feel free to contact the undersigned at (508) 946-2779.

Very truly yours,  
(Signed on 02/24/03)

John K. Winkler, Chief  
Permit Section  
Bureau of Waste Prevention

Enclosures

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## TABLE OF CONTENTS

I.	FACILITY DESCRIPTION.....	5
II.	EMISSIONS.....	6
III.	PREVENTION OF SIGNIFICANT DETERIORATION (PSD) REVIEW.....	8
IV.	EMISSION OFFSETS AND NONATTAINMENT REVIEW.....	11
V.	NEW SOURCE PERFORMANCE STANDARDS.....	13
VI.	BEST AVAILABLE CONTROL TECHNOLOGY.....	13
VII.	SOUND.....	15
VIII.	SPECIAL CONDITIONS.....	16
IX.	MONITORING AND RECORDING REQUIREMENTS.....	17
X.	RECORD KEEPING REQUIREMENTS.....	17
XI.	REPORTING REQUIREMENTS.....	18
XII.	TESTING REQUIREMENTS.....	19
XIII.	GENERAL REQUIREMENTS.....	20
XIV.	CONSTRUCTION REQUIREMENTS.....	21
XV.	MASSACHUSETTS ENVIRONMENTAL POLICY ACT.....	22
XVI.	LIST OF PERTINENT INFORMATION.....	22
XVII.	APPEAL PROCESS.....	23

## **I. FACILITY DESCRIPTION**

### **A. Site Description**

The Somerset Power, LLC site consists of approximately 60 acres of land situated in a mixed use area of Somerset, Massachusetts consisting of residential and commercial properties. The existing Somerset Power site includes approximately 137 megawatts (MW) net of coal, residual oil and jet fuel-fired electric power generation equipment. The site is bordered by County Street and Riverside Avenue to the west, the Taunton River to the east, residential properties and Annette Avenue to the north, and Stevens Street, a residential property and the Taunton River to the south.

The neighboring community consists of a mix of commercial and residential properties. The nearest residential areas are directly adjacent to the site to the north and south, and along the west side of Riverside Avenue.

### **B. Project Description**

Somerset Power, LLC Somerset Station is subject to 310 CMR 7.29 Emission Standards for Power Plants that were promulgated on May 11, 2001. These regulations impose new facility-wide annual and calendar month emission limits for nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), and carbon dioxide (CO<sub>2</sub>), in units of pounds per megawatt hour (lb/MWh), and provide for a feasibility evaluation and the promulgation of emission standards for mercury. These regulations did not impose carbon monoxide and fine particulate matter emission standards at this time but indicated that development of emission standards is reserved. These regulations required applicable power plants to submit an Emission Control Plan (ECP) that defined how the facility would comply with the 310 CMR 7.29 requirements. Final Approval of the Emission Control Plan (ECP) was issued by the Department, to Somerset Power, LLC on June 7, 2002. The Final Approval advised Somerset Power, LLC of the requirement to receive a Plan Approval pursuant to 310 CMR 7.02 for the construction of the natural gas reburn project. On August 5, 2002, the Department received Somerset Power, LLC's application requesting Plan Approval of the natural gas reburn project. In addition, although not required by 310 CMR 7.29 Somerset Power, LLC has made application pursuant to 310 CMR 7.02 for modifications to the coal pile and construction of a fixed sound barrier along Riverside Avenue.

Somerset Power, LLC (the "Applicant") proposes alterations of Unit 6 (aka Boiler 8) rated at 113 MWh net. Boiler 8 is a Combustion Engineering, tangentially fired, boiler that utilizes pulverized coal as the primary fuel and No. 6 fuel oil as a secondary fuel. Boiler 8 is rated at 1,186 million Btu per hour (MMBtu/hr) heat input. The boiler is capable of supplying 800,000 pounds of steam per hour at 1,925 psig and 1,000 °F to Unit 6 generator. A natural gas reburn system is proposed for Boiler 8 primarily for the control of NO<sub>x</sub> emissions. Boiler 8 is currently equipped with NOX-OUT, Selective Non-catalytic Reduction (SNCR) post combustion NO<sub>x</sub> emission controls that will work in conjunction with the proposed natural gas reburn system.

Somerset Power, LLC proposes to construct a natural gas reburn system manufactured by General Electric Energy and Environmental Research (GE-EER). The gas reburn system will include the installation of close-coupled over-fire air ports (CCOFA), natural gas injectors, and separated over-fire air ports (SOFA). Approximately 12-20%, with a design target of 15%, of the boiler's coal and/or oil heat input will be replaced with natural gas. The combination of the over fire air systems and introduction of natural gas firing will significantly reduce NO<sub>x</sub>, SO<sub>2</sub> and CO<sub>2</sub> emissions from Boiler 8. Furthermore, the burning of natural gas will reduce overall emissions, such as Hg and other heavy metals, and combustion by-products, such as bottom ash and fly ash, by approximately the same percentage as the natural gas firing rate.

Natural gas reburn technology is a combustion modification technology that allows the existing burners to be denied excess oxygen, which results in reduced NO<sub>x</sub> emissions, and higher levels of products of incomplete combustion (PIC's) such as carbon monoxide (CO) and volatile organic compounds (VOC). Somerset Power, LLC proposes a collateral increase in actual and potential VOC emissions, and a collateral increase in actual CO emissions with the gas reburn technology. A NO<sub>x</sub>/CO/VOC optimization program after startup is proposed to ensure that the lowest overall emission levels will be achieved. Air contaminant emission increases are addressed in the Best Available Control Technology (BACT) analysis section of this Conditional Approval.

All components of the natural gas reburn system will be located within the existing building and the natural gas pipe line will be buried below grade with the exception of less than 10 feet above ground just prior to entering the building.

The sound wall barrier project consists of replacing the inactive coal pile that acted as a sound barrier along the eastern side of the south parking lot with a permanent sound wall. The inactive coal pile sound barrier was addressed in Department plan approval (SM82-084-CO and SM83-022-CO) dated December 11, 1986. The proposed sound wall is a pre-cast concrete structure that will be 20 feet in height, the same height required of the inactive coal pile, and 404 feet long. All existing requirements concerning the design, operation and maintenance of the inactive coal pile contained in Department Approvals dated March 21, 1983 and December 11, 1986 (SM82-084-CO, SM83-021-CO, SM83-022-CO, SM83-094-CO, SM84-036-CO, SM84-043-M and SM82-085-CO) will no longer be applicable once the sound wall construction is complete. Sound impacts previously approved by the Department will not increase with the proposed sound wall; and fugitive coal dust emissions will be reduced once the sound wall is constructed.

## **II. EMISSIONS**

### **A. Background**

Boiler 8 currently burns coal and No. 6 fuel oil and will in the future burn natural gas in a reburn mode with coal and oil. Emissions to the ambient air from Boiler 8 operation include the following criteria air contaminants: Particulate Matter (PM), Particulate Matter 10 microns and smaller (PM<sub>10</sub>), SO<sub>2</sub>, CO, NO<sub>x</sub>, Lead (Pb) and VOC and the non-criteria air contaminant:

Ammonia (NH<sub>3</sub>). With the addition of natural gas reburn air contaminant potential to emit (PTE) emission rates to the ambient air will decrease with the exception of VOC which will increase by 24.4 tons per year.

**B. New Emission Limits**

1. The approval contained herein establishes Boiler 8 emission limits for CO, NH<sub>3</sub> and VOC. Boiler 8 shall not exceed the emission limitations as specified in Table 1:

<b>Table 1: BOILER 8 NEW EMISSION LIMITS</b>				
<b>Emission</b>	<b>ppm<sub>vd</sub> @ 3% O<sub>2</sub><sup>1</sup></b>	<b>lb/MMBtu<sup>2</sup></b>	<b>lbs/hr<sup>3</sup></b>	<b>tons/yr<sup>4</sup></b>
CO <sup>5</sup>	100 <sup>6</sup>	0.083	98.4	431.2
NH <sub>3</sub> <sup>7</sup>	20	0.0101	12.0	52.4
VOC <sup>8</sup>	15.5	0.0073	8.7	37.9

Note:

- 1 - Parts per million volume dry corrected to 3 percent oxygen.
- 2 - Pounds per million British Thermal Units.
- 3 - Pounds per hour.
- 4 - Tons per consecutive 12-month period.
- 5 - CO emission limits are based on a calendar day average from the continuous emission monitoring (CEM) system with calculated equivalent mass emission rates expressed in lb/MMBtu, lb/hr, tons/yr.
- 6 - The BACT analysis section requires an optimization/minimization program with a goal to achieve 20 ppm.
- 7 - Based on stack compliance test (average of three one-hour runs) per 40 CFR 60.8 and a Reference Test Method approved by the Department.
- 8 - Based on stack compliance test (average of three one-hour runs) per 40 CFR 60.8 and 40 CFR 60 Appendix A Method 25, or as otherwise approved by the Department.

2. Boiler 8 will become subject to Table 1: Boiler 8 New Emission Limits as of the date specified in Section XI.4.e., but not later than 180 days after initial burning of the natural gas, and no later than 10/01/06.
3. Somerset Power LLC shall perform a NO<sub>x</sub>/CO/VOC optimization/minimization program prior to compliance emission testing.
4. The Department reserves the right to reduce CO and/or VOC emissions to less than the above based upon compliance emission test results achieved and CEM data.
5. The Unit 6/Boiler 8 start up requirements pertaining to NO<sub>x</sub> and CO emissions contained in Section VI – Special Conditions of the September 29, 1998 NO<sub>x</sub> Reasonably Available Control Technology (RACT) ECP Approval (4B95165) remain in effect.

### **III. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) REVIEW**

#### **A. Background**

The federal government under the jurisdiction of the Environmental Protection Agency (EPA) established National Ambient Air Quality Standards (NAAQS) for six air contaminants, known as criteria pollutants, for the protection of public health and welfare. These criteria pollutants are Sulfur Dioxide (SO<sub>2</sub>), Particulate Matter having a diameter of 10 microns or less (PM<sub>10</sub>), Nitrogen Dioxide (NO<sub>2</sub>), Carbon Monoxide (CO), Ozone (O<sub>3</sub>), and Lead (Pb).

The state government under the jurisdiction of the Department of Environmental Protection (the "Department") has adopted these ambient air quality standards for the Commonwealth of Massachusetts as stated under 310 CMR 6.00 Ambient Air Quality Standards for the Commonwealth of Massachusetts. One of the basic goals of federal and state air

regulations is to ensure that ambient air quality, including the impact of existing and new sources, complies with ambient standards. Towards this end, EPA classified all areas of the country as "attainment", "nonattainment", or "unclassified" with respect to the NAAQS.

New major sources of regulated air pollutants or major modifications to existing major sources of regulated air pollutants that are located in areas classified as either "attainment" or "unclassified" are subject 40 CFR Section 52.21 Prevention of Significant Deterioration of Air Quality ("PSD") regulations. Pursuant to 40 CFR 52.21(b)(1)(I)(a.), a source is considered "major" if it has the potential to emit 100 tons per year (tpy) or more of any pollutant and is listed as one of the 28 designated PSD stationary source categories, and is considered a "major modification" if the physical change or change in the method of operation of a "major" source would result in a significant net emission increase. A physical change or change in the method of operation does not include the addition, replacement or use of a pollution control project at an existing electric utility steam generating unit, unless the Department determines that such addition, replacement, or use renders the unit less environmentally beneficial.

Effective July 1, 1982, the PSD program has been implemented by the Department in accordance with the Department's "Procedures for Implementing Federal Prevention of Significant Deterioration Regulations". On August 5, 2002, Somerset Power, LLC submitted to the Department an application, pursuant to 310 CMR 7.02 to alter and operate existing Unit 6 (Boiler 8) 113 megawatt net steam to electric power generation facility at Somerset Operations, Inc., 1606 Riverside Avenue, Somerset, Massachusetts. Boiler 8 is rated at 1,186 MMBtu/hr heat input, thus the facility is one of the 28 designated PSD stationary source categories, namely a fossil fuel fired steam electric plant of more than 250 MMBtu/hr heat input. Somerset Operations, Inc. is an existing major source of regulated air pollutants.

**B. General Information**

1. PSD Applicability Determination & Attainment Status

The Applicant is proposing to alter Unit 6/Boiler 8 at the electric utility steam generating facility in Somerset, Massachusetts. The facility is located in an area which is in either “attainment” or “unclassified” for Sulfur Dioxide (SO<sub>2</sub>), Nitrogen Dioxide (NO<sub>2</sub>), Carbon Monoxide (CO), Lead (Pb), and total Particulate Matter (PM), which includes PM that does not exceed 10 microns in size (referred to as PM<sub>10</sub>). Therefore, the facility is located in a PSD area for these pollutants.

Table 2 identifies Unit 6/Boiler 8 historical “actual emissions” and projected “representative actual annual emissions”.

<b>Table 2: PREVENTION OF SIGNIFICANT DETERIORATION REVIEW</b>								
		Actual Emissions		Baseline Emissions <sup>3</sup>	Projected Emissions with Gas Reburn <sup>3</sup>	Net Emission Change	PSD Significance Threshold	PSD Significant (Y/N)
		Emissions 2000	Emissions 2001	2000/01 Average	Representative Actual Annual Emissions	(Projected) -(Baseline)		
Fuel	MMBtu/yr	9,345,477	8,458,032	8,901,740	8,901,740	--	--	--
Fuel	% of max. <sup>1</sup>	90%	81%	86%	86%	--	--	--
Coal	MMBtu/yr	9,028,704	8,202,139	8,615,421	7,323,108	--	--	--
6 Oil	MMBtu/yr	316,714	255,874	286,294	243,350	--	--	--
2 Oil / Jet Fuel	MMBtu/yr	30	19	24	21	--	--	--
Natural Gas	MMBtu/yr	--	--	--	1,335,261 <sup>2</sup>	--	--	--
NO <sub>x</sub>	tons/yr	1,454.7	1,417.2	1,436.0	638.5	-797.5	25	No
CO	tons/yr	72.1	47.6	59.9	369.4	+309.5	100	Yes
VOC	tons/yr	12.5	11.3	11.9	32.5	+20.6	25	No
SO <sub>2</sub>	tons/yr	5,079.4	4,516.9	4,798.2	2,553.9	-2,244.3	100	No
PM	tons/yr	303.9	274.9	289.4	251.0	-38.4	25	No
PM <sub>10</sub>	tons/yr	192.0	173.2	182.6	160.2	-22.4	15	No
H <sub>2</sub> SO <sub>4</sub>	tons/yr	51.6	46.4	49.0	41.9	-7.1	7	No
Pb	tons/yr	2.3	2.1	2.2	1.9	-0.3	0.6	No

Notes:

1 – The maximum annual heat input is 1,186 MMBtu/hr X 8,760 hr/yr = 10,389,390 MMBtu/yr

2 – 15% of total heat input

3 – The emission rates are based on Table 3 Emission Factors

MMBtu/yr = million British Thermal Units per year

% of max. = percent of maximum

tons/yr = tons per year

<b>Table 3: EMISSION FACTORS</b>			
<b>Emission</b>	<b>Fuel</b>	<b>Baseline Emission Factors</b>	<b>Representative Actual Annual Emission Factors</b>
NO <sub>x</sub>	All	CEMS Data	1.5 lb/MWh <sup>1</sup>
SO <sub>2</sub>	All	CEMS Data	6.0 lb/MWh <sup>2</sup>
CO	All	CEMS Data	0.083 lb/MMBtu <sup>3</sup>
VOC	Coal	0.0026 lb/MMBtu	0.0073 lb/MMBtu <sup>4</sup>
	No. 6 Oil	0.0051 lb/MMBtu	0.0073 lb/MMBtu <sup>4</sup>
	Natural Gas	--	0.0073 lb/MMBtu <sup>4</sup>
PM	Coal	0.0646 lb/MMBtu	0.0646 lb/MMBtu
	No. 6 Oil	0.0777 lb/MMBtu	0.0777 lb/MMBtu
	Natural Gas	--	0.0075 lb/MMBtu
PM <sub>10</sub>	Coal	0.0398 lb/MMBtu	0.0398 lb/MMBtu
	No. 6 Oil	0.0777 lb/MMBtu	0.0777 lb/MMBtu
	Natural Gas	--	0.0075 lb/MMBtu
H <sub>2</sub> SO <sub>4</sub>	Coal	0.0103 lb/MMBtu	0.0103 lb/MMBtu
	No. 6 Oil	0.0325 lb/MMBtu	0.0325 lb/MMBtu
	Natural Gas	--	0.0003 lb/MMBtu
Pb	Coal	5.07 E-04 lb/MMBtu	5.07 E-04 lb/MMBtu
	No. 6 Oil	4.02 E-05 lb/MMBtu	4.02 E-05 lb/MMBtu
	Natural Gas	--	4.90 E-07 lb/MMBtu

Notes:

- 1 - NO<sub>x</sub> Emission limits are set in 310 CMR 7.29(5)(a)(1) effective 10/1/2006.
- 2 - SO<sub>2</sub> Emission limits are set in 310 CMR 7.29(5)(a)(2) effective 10/1/2006 through September 30, 2008. SO<sub>2</sub> reductions at the affected facility below historical actual emissions may be used to meet this standard.
- 3 - Current CO emission limit for this unit is 200 ppm based upon a 24 hour- average and as a result of this project the limit will be reduced to 100 ppm (0.083 lb/MMBtu) based upon a 24 hour- average.
- 4 - There is currently no VOC emission limit for this unit, as a result of this project the VOC emission limit will be set at 0.0073 lb/MMBtu.

The Boiler 8 gas reburn project, based on past actual emissions to future representative actual emissions will result in significant emission reductions of NO<sub>x</sub>, SO<sub>2</sub>, PM, PM<sub>10</sub> and sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>) and a significant net increase in representative actual emissions of CO. The Department has considered the significant net increase in representative actual emissions of CO with respect to CAA Title 1 SIP demonstration, National Ambient Air Quality Standards and visibility.

## 2. CO Emission Increase Analysis

The CO emission inventory used for the most recent Title 1 SIP demonstration consisted of transportation related CO emissions. Since the CO SIP demonstration, Boiler 7 was shutdown and would be required to obtain a 310 CMR 7.02 Plan Approval prior to returning Boiler 7 to operation, and Combustion Turbine J-1, a simple cycle turbine, was removed from the site. Currently, Somerset Operations, Inc. consists of two electric generating units, Unit 6 (Boiler 8) and Combustion Turbine J-2. Furthermore, this approval, reduces the current Boiler 8 CO

emission limit from 200 ppm<sub>vd</sub> @ 3% O<sub>2</sub> to 100 ppm<sub>vd</sub> @ 3% O<sub>2</sub>. The Applicant proposed this restriction and the approval herein includes a new CO emission limit of 100 ppm<sub>vd</sub> @ 3% O<sub>2</sub> and a NOX/VOC/CO optimization/minimization program with a CO emission goal of 20 ppm<sub>vd</sub> @ 3% O<sub>2</sub>.

Boiler 8 collateral CO actual emission increase will not adversely affect NAAQS attainment nor visibility. Based upon a US EPA SCREEN3 model analysis, Boiler 8 ambient impacts will be substantially less than the PSD Class II significance impact level (SIL) for CO. Furthermore, significant reductions of NO<sub>x</sub>, SO<sub>2</sub>, PM, PM<sub>10</sub>, and H<sub>2</sub>SO<sub>4</sub> emissions that impact visibility will be realized by the natural gas reburn project.

### **C. Conclusion**

The Boiler 8 natural gas reburn project, based on current information and pursuant to 40 CFR 52.21(b)(2), is not considered a “major modification” to an existing major source since it does not constitute a “physical change or a change in the method of operation”. The proposed alteration/construction has been determined by the Department, pursuant to 40 CFR 52.21(b)(2)(iii)(h) to be a “pollution control project” at an existing electric utility steam generating unit that is “environmentally beneficial”. Based on current information, a preconstruction PSD Permit pursuant to 40 CFR 52.21 is not required for the natural gas reburn project. Refer to Section X and XI for emission record keeping and reporting requirements.

## **IV. EMISSION OFFSETS AND NONATTAINMENT REVIEW**

### **A. Background**

The entire Commonwealth of Massachusetts is designated "serious" nonattainment (NA) for the pollutant ozone (O<sub>3</sub>) NAAQS. Nitrogen Oxides (NO<sub>x</sub>) and Volatile Organic Compounds (VOCs) emissions are precursors to the formation of O<sub>3</sub>.

New major sources of regulated air pollutants or major modifications to an existing major sources of regulated air pollutants that are located in areas classified as “nonattainment” are subject to 310 CMR 7.00 Appendix A: Emission Offsets and Nonattainment Review. Pursuant to 310 CMR 7.00 Appendix A(2), a source is considered “major “ if it has a potential to emit 50 tons per year (tpy) or more of NO<sub>x</sub> or VOC, and is considered a “major modification” if the physical change or change in method of operation of a “major” source would result in a significant net emission increase. A significant net emission increase for applications received after November 15, 1992 is defined as 25 tpy of either VOC or NO<sub>x</sub> emissions. A physical change or change in the method of operation does not include the addition, replacement or use of a pollution control project at an existing electric utility steam generating unit, unless the Department determines that such addition, replacement, or use renders the unit less environmentally beneficial.

Applicable requirements for any proposed new major stationary source of NO<sub>x</sub> and/or VOC require the source to meet Lowest Achievable Emission Rate (LAER) and obtain emission offsets.

## B. General Information

Alteration of Unit 6 is not categorized as a “major modification” to an existing major source since the alteration has been determined by the Department to be a “pollution control project” at an existing steam generating unit that is “environmentally beneficial”.

Table 4 identifies historical “actual emissions” and projected “representative actual annual emissions” for emissions subject to Nonattainment review.

Table 4: NONATTAINMENT REVIEW								
		Actual Emissions		Baseline Emissions <sup>3</sup>	Projected Emissions with Gas Reburn <sup>3</sup>	Net Emission Change	NA Significance Threshold	NA Significant (Y/N)
		Emissions 2000	Emissions 2001	2000/01 Average	Representative Actual Annual Emissions	(Projected) -(Baseline)		
Fuel	MMBtu/yr	9,345,477	8,458,032	8,901,740	8,901,740	--	--	--
Fuel	% of max. <sup>1</sup>	90%	81%	86%	86%	--	--	--
Coal	MMBtu/yr	9,028,704	8,202,139	8,615,421	7,323,108	--	--	--
6 Oil	MMBtu/yr	316,714	255,874	286,294	243,350	--	--	--
2 Oil / Jet Fuel	MMBtu/yr	30	19	24	21	--	--	--
Natural Gas	MMBtu/yr	--	--	--	1,335,261 <sup>2</sup>	--	--	--
<b>NO<sub>x</sub></b>	tons/yr	1,454.7	1,417.2	1,436.0	638.5	<b>-797.5</b>	25	No
<b>VOC</b>	tons/yr	12.5	11.3	11.9	32.5	<b>+20.6</b>	25	No

Notes:

1 – The maximum annual heat input is 1,186 MMBtu/hr X 8,760 hr/yr = 10,389,390 MMBtu/yr

2 – 15% of total heat input

3 – The emission rates are based on Table 3 Emission Factors

The gas reburn project, based on past actual emissions to future representative actual emissions will result in significant NO<sub>x</sub> emission reductions, and an insignificant net increase in representative actual emissions of VOC. Boiler 8 collateral VOC actual emission increase will not adversely affect NAAQS for ozone due to the substantial reductions of NO<sub>x</sub> emissions.

## C. Conclusion

The Boiler 8 natural gas reburn project, based on current information and pursuant to 310 CMR 7.00 Appendix A(2), is not considered a “major modification” to an existing major source since it does not constitute a “physical change or a change in the method of operation”. The proposed alteration/construction has been determined by the Department, pursuant to 310 CMR 7.00 Appendix A(2)(“major modification”)(c)(8), to be a “pollution control project” at an existing electric utility steam generating unit that is “environmentally beneficial”. Based on current information, LAER and Offsets pursuant to 310 CMR 7.00 Appendix A are not required for the natural gas reburn project. Refer to Section X and XI for emission record keeping and reporting requirements.

## **V. NEW SOURCE PERFORMANCE STANDARDS**

Unit 6 is considered to be a “fossil-fuel fired steam generating unit” and an “electric utility steam generating unit” since Unit 6/Boiler 8 burns fossil fuels at a rate greater than 250 MMBtu/hr and more than one third of Unit 6 net electrical output will be sold to a utility. The New Source Performance Standards (NSPS) for fossil-fuel fired steam generators and electric utility steam generating units, Title 40 Part 60 Subpart D and Subpart Da, respectively, of the Code of Federal Regulations, are not applicable to Unit 6/Boiler 8.

Construction and operation of the natural gas reburn system will not constitute a “modification” since the reburn system primary function is the reduction of air pollutants. Emission reductions of particulate, SO<sub>2</sub> and NO<sub>x</sub> will be realized with the natural gas reburn system in operation. In addition, the reburn system construction is not by definition “reconstruction” since the fixed capital cost of the natural gas reburn system does not exceed 50% of the fixed capital cost that would be required to construct a comparable new facility.

## **VI. BEST AVAILABLE CONTROL TECHNOLOGY**

Pursuant to 310 CMR 7.02(3)(j)6., the Applicant is required to evaluate Best Available Control Technology (BACT) as it applies to any air contaminant that will result in a potential emission increase. The only air contaminant from Boiler 8 that will have a potential emission increase is volatile organic compounds (VOCs). Therefore, BACT review requirements are limited to VOC emissions. BACT is defined as an emission limitation using the optimum level of control applied to pollutant emissions based upon consideration of technical, economic, and environmental factors.

The first step in a BACT analysis is to determine for the emission source, the most stringent control available for a similar or identical source or source category. The proposed facility must utilize BACT to control VOC emissions. The Department has verified and concurs with the following Comparative BACT Analysis (as referenced in the Applicant’s Non-Major Comprehensive Plan Application).

<b>Table 3: VOC Comparative BACT Analysis</b>				
<b>Control Technology</b>	<b>Emission Rate</b>	<b>BACT</b>	<b>Costs<sup>1</sup></b>	<b>Reason</b>
Oxidation Catalyst	8 ppmvd	No	\$\$\$\$\$	Not commercially demonstrated on coal fired boilers of this size. The economic analysis demonstrates that the total annualized cost for a VOC oxidation catalyst is in excess of \$100,000 per ton controlled due to the relatively low uncontrolled VOC emission rate of 37.9 tpy.
Combustion Controls	16 ppmvd	Yes	\$	Is the top BACT case. It is consistent with the most recent VOC BACT determinations for coal fired facilities.

Note:

- 1 - \$ = least expensive (relative to control technologies for that specific pollutant)
- \$\$ = moderately expensive (relative to control technologies for that specific pollutant)
- \$\$\$ = fairly expensive (relative to control technologies for that specific pollutant)
- \$\$\$\$ = very expensive (relative to control technologies for that specific pollutant)
- \$\$\$\$\$ = extremely expensive (relative to control technologies for that specific pollutant)

Therefore, based upon the economic analysis portion of the top-down BACT process, currently available data, and the tenets and procedures of the BACT process, the Department has concluded that the VOC combustion control system is the more cost-effective means to achieve the BACT emission rate for VOC.

The BACT VOC combustion controls consists of a natural gas reburn system manufactured by General Electric Energy and Environmental Research. The VOC combustion controls will reduce coal and/or heat input by 12-20%, with a design target of 15%, with the heat input replaced by natural gas combusted in the reburn system. Major components of the natural gas reburn system consist of close-coupled over-fire air ports (CCOFA), natural gas injectors, and separate over-fire air ports (SOFA).

The Emissions Section of this approval requires that a NO<sub>x</sub>/CO/VOC optimization program be conducted prior to compliance testing. The goal of the optimization program is to achieve CO emissions of 20 ppm<sub>vd</sub> @ 3% O<sub>2</sub> or less. The Department reserves the right to establish new CO and VOC emission limits that are less than the limits defined in Section II above. Refer to Section VIII Special Conditions item 6 for additional requirements concerning the establishment of final CO and VOC emission limits.

## **VII. SOUND**

### **A. Background**

The Department regulation concerning sound emissions is contained in 310 CMR 7.10 Noise. This regulation requires that necessary equipment and precautions be used to prevent a condition of air pollution due to sound emissions from the facility. The Department's existing guideline for enforcing the noise regulation is contained in the Department's Policy 90-001; the policy provides broadband and pure tone sound level criteria.

The Somerset Power, LLC facility sound impacts were extensively evaluated at the time of the conversion to coal in the 1980's. Sound emissions and control requirements for the coal conversion are contained in the Department's December 11, 1986 Plan Approval (SM82-084-CO, SM83-021-CO, SM-83-022-CO, SM83-094-CO, and SM84-043-M) and remain in effect other than the requirements concerning the design, operation and maintenance of the inactive coal pile.

Based upon a records review and information contained within the proposed sound wall application, the existing facility has not caused a condition of air pollution due to sound emissions since the coal conversion in the 1980's.

### **B. General Information**

#### **1. Natural Gas Reburn Equipment**

All components of the natural gas reburn system are located within the existing power plant building, other than the natural gas pipeline that will be under ground with the exception of less than 10 feet above ground just prior to entering the building.

#### **2. Sound Barrier Wall**

The South Yard inactive coal pile replacement with the proposed sound barrier wall will provide for equivalent or less sound impacts off site relative to historical impacts. Furthermore, the retirement of Boiler 7 and the reduction (12-20%) of coal use at the site due to the natural gas reburn project will further reduce sound level impacts off site due to less coal being received and managed in the South Yard.

### **C. Conclusion**

Sound impacts due to the natural gas reburn project and construction of the proposed precast concrete sound wall will be at least equal in height and length of the inactive coal pile will result in no increase in sound impacts at adjacent residential areas.

Sound impacts proposed in the application meet the requirements contained in 310 CMR 7.10 Noise and will not cause or contribute to a condition of air pollution.

Somerset Power, LLC shall conduct a sound survey within 60 days from the completion of construction of the sound wall and submit a report to the Department, within 30 days after the sound survey, defining actual sound impacts in comparison to impacts proposed in the application approved herein.

### **VIII. SPECIAL CONDITIONS**

1. The Applicant shall submit to the Department, in accordance with the provisions of Regulation 310 CMR 7.02(5)(c), plans and specifications for the natural gas reburn system once the specific information has been determined, but in any case not later than 30 days prior to commencement of construction/installation of the natural gas burners.
2. Within 60 days from the date of this Conditional Approval, the Applicant shall revise the pending Operating Permit application (4V95057) and submit it to the Department pursuant to Regulation 310 CMR 7.00: Appendix C.
3. The Applicant shall submit Standard Operating and Maintenance Procedures (SOMP) for the new equipment to the Department no later than 60 days after commencement of operation of the proposed facility. Thereafter, the Applicant shall submit updated versions of the SOMP to the Department no later than 30 days prior to the occurrence of a significant change. The Department must approve in writing any significant changes to the SOMP prior to the SOMP becoming effective.
4. The Applicant shall, within 60 days after the submittal to the Department of the compliance test report, propose a surrogate methodology or parametric monitoring for NH<sub>3</sub> emissions based on compliance test results and operating experience.
5. The Applicant shall maintain a complaint log concerning emissions, odor, dust and noise from the facility. The Applicant shall make available to the general public a telephone number that will receive and record complaints 24 hours per day, 7 days per week. The complaint log shall be maintained for the most recent five (5) year period. The complaint log shall be made available to the Department upon request. The Applicant shall take all reasonable actions to respond to said complaints.
6. The Applicant, within 12-months of the date specified in Section XI.4.e., shall propose new CO and VOC emission limits and provide supporting justification for new proposed emission limits taking into consideration the NO<sub>x</sub>/VOC/CO optimization/minimization program emission test data, compliance emission test data, CO CEM data and operating experience. The Department will establish final CO and VOC emission limits after review of the Applicant's proposed final emission limits and supporting documentation. The goal of the program is to achieve CO emissions of 20 ppm<sub>vd</sub> @ 3% O<sub>2</sub> or less.

7. Somerset Power, LLC shall repower Unit 6, in accordance with the provisions of its approved Emission Control Plan, by January 1, 2010, or terminate any operation of Unit 6 after January 1, 2010 should Somerset Power, LLC fail to repower Unit 6 by January 1, 2010. For the purposes of Special Condition 7 the term “Repowering” is defined in 310 CMR 7.00: Definitions and is defined as “Repowering means the replacement of an emission unit with a new unit that is less polluting and more efficient than the unit which is being replaced.” Preconstruction plan approval requirements for repowering projects are contained in Regulation 310 CMR 7.02 Plan Approval and Emission Limitations.

## **IX. MONITORING AND RECORDING REQUIREMENTS**

1. All current monitoring and recording requirements remain in effect and are not altered herein.
2. The Applicant shall ensure continuous monitoring and compliance with VOC emission limits utilizing the CO parametric monitoring methodology developed during the initial compliance test.
3. If CO emissions are below the CO emission limit, the VOC emissions shall be considered as meeting the emission limits contained in this Conditional Approval, subject to correlation as contained in Proviso IX. 4 below.
4. If CO emissions are above the CO emission limit, the VOC emissions shall be considered as occurring at a rate determined by the equation:  $VOC_{actual} = VOC_{LIMIT} \times (CO_{actual} / CO_{limit})$ , pending the outcome of the initial compliance testing, after which a VOC/CO correlation curve and/or emission factors for Unit 6/Boiler 8 will be developed and used for VOC compliance determination purposes.

## **X. RECORD KEEPING REQUIREMENTS**

1. A record keeping system for the proposed facility shall be established and maintained on site by the Applicant. All such records shall be maintained up-to-date such that year-to-date information is readily available for Department examination upon request and shall be kept on-site for a minimum of five (5) years. Record keeping shall, at a minimum, include:
  - a) Compliance records sufficient to demonstrate that emissions from the facility have not exceeded what is allowed by this Conditional Approval. Such records shall include, but are not limited to, fuel usage rates, emissions test results, monitoring equipment data and reports.
  - b) Maintenance: A record of routine maintenance activities performed on the proposed control equipment and monitoring equipment including, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.

- c) Malfunctions: A record of all malfunctions on the proposed Unit 6/Boiler 8 control and monitoring equipment including, at a minimum: the date and time the malfunction occurred; a description of the malfunction and the corrective action taken; the date and time corrective actions were initiated; and the date and time corrective actions were completed and the proposed equipment was returned to compliance.
2. The Applicant shall maintain on-site for five (5) years all records of output from all continuous monitors for flue gas emissions and fuel consumption, and shall make these records available to the Department upon request.
3. The Applicant shall maintain a log to record problems, upsets or failures associated with the proposed emission control systems.

## **XI. REPORTING REQUIREMENTS**

1. All notifications and reporting required by this Conditional Approval shall be made to the attention of:  
Department of Environmental Protection  
Bureau of Waste Prevention  
20 Riverside Drive  
Lakeville, Massachusetts 02347  
ATTN: Gerald A. Monte, Chief Compliance and Enforcement Section  
Telephone: (508) 946-2825  
Fax: (508) 947-6557 or (508) 946-2865
2. Pursuant to 40 CFR 52.21 and 310 CMR 7.00 Appendix A, Somerset Power, LLC on an annual basis for a period of 5 years from the date the unit resumes regular operation, shall submit information demonstrating that the physical or operational change (natural gas reburn) did not result in an emission increase beyond the “representative actual annual emissions” defined in Section III Prevention of Significant Deterioration (PSD) Review and Section IV Emission Offsets and Nonattainment Review. Should there be an increase beyond that defined in Sections III and IV, the Department will consider information provided by Somerset Power, LLC that the increase is unrelated to the natural gas reburn system, such as, any increased utilization due to the rate of electricity demand growth for the utility system as a whole.
3. Somerset Power, LLC shall notify the Department by telephone or fax as soon as possible but no later than three (3) business days after the occurrence of any upsets or malfunctions to the proposed facility equipment, air pollution control equipment, or monitoring equipment which results in an excess emission to the ambient air and/or a condition of air pollution.
4. Somerset Power, LLC shall notify the Department in writing within 10 days after each activity listed below occurs:

- a) The date construction commences on the natural gas reburn system.
- b) The date natural gas reburn system construction is completed.
- c) The date natural gas is first burned in the reburn system.
- d) The date Unit 6/Boiler 8 attains the maximum production rate.
- e) The date Unit 6/Boiler 8 is available for commercial operation (as defined by ISO New England, Inc.) with the natural gas reburn system in continuous operation.
- f) The date construction commences on the permanent sound wall.
- g) The date permanent sound wall construction is completed.

## **XII. TESTING REQUIREMENTS**

1. The Applicant shall ensure that the proposed facility is constructed to accommodate the emissions (compliance) testing requirements contained herein. All emissions testing shall be conducted in accordance with the Department's "Guidelines for Source Emissions Testing" and in accordance with the Environmental Protection Agency reference test methods as specified in 40 CFR Part 60, Appendix A.
2. The applicant shall conduct a NO<sub>x</sub>/VOC/CO optimization/minimization emission test program and submit the final test report to the Department at least 30 days prior to the start of emission compliance testing. Special attention shall be given to assure the VOC test method parameters will provide samples that will be within the detection limit of the actual VOC emission levels. Preliminary VOC emission testing shall be conducted prior to the optimization/minimization emission test program to assure results will be within the detection limit during the optimization/minimization test program.
3. The Applicant shall conduct initial emission compliance tests no later than 180 days after the date specified in Section XI4.e. The emission compliance test program shall comply with the Department of Environmental Protection Guidelines for Source Emission Testing.
4. The Applicant must obtain written Department approval of an emissions test protocol. The protocol shall include a detailed description of sampling port locations, sampling equipment, sampling and analytical procedures, and operating conditions for any such emissions testing. It must be submitted to the Department at least 30 days prior to commencement of testing of the facility.
5. The Applicant shall ensure that a final emissions test results report is submitted to the Department within 60 days of completion of the emissions testing program.
6. The Applicant shall conduct initial compliance tests to demonstrate that Unit 6/Boiler 8 is in compliance with the emission limits (lb/hr, lb/MMBtu, ppmvd as applicable, and opacity) for the pollutants listed below. Testing for the following pollutants shall be conducted at 100% of rated base load:
  - a) Nitrogen Oxides (NO<sub>x</sub>)
  - b) Carbon Monoxide (CO)

- c) Volatile Organic Compounds (VOC)
  - d) Particulate Matter (PM)
  - e) Opacity
  - f) Ammonia (NH<sub>3</sub>)
7. In accordance with 310 CMR 7.04(4)(a), the Applicant shall have Unit 6/Boiler 8 inspected and maintained in accordance with the manufacturer's recommendations and tested for efficient operation at least once in each calendar year. The results of said inspection, maintenance and testing and the date upon which it was performed shall be recorded and posted conspicuously on or near the proposed equipment.
8. In accordance with 310 CMR 7.13 the Department may require additional emissions testing of the proposed facility at any time to ascertain compliance with the Department's Regulations or any proviso(s) contained in this Conditional Approval.

### **XIII. GENERAL REQUIREMENTS**

1. The Applicant shall properly train all personnel to operate the proposed facility and control equipment in accordance with vendor specifications.
2. All requirements of this Conditional Approval that apply to the Applicant shall apply to all subsequent owners and/or operators of the facility.
3. The Applicant shall maintain the standard operating and maintenance procedures for all air pollution control equipment, including the natural gas reburn system in a convenient location (e.g., control room/technical library) and make them readily available to all employees.
4. The Applicant shall comply with all provisions of 310 CMR 6.00-8.00 that are applicable to this facility.
5. This Conditional Approval may be suspended, modified, or revoked by the Department if, at any time, the Department determines that the facility is violating any condition or part of the Approval.
6. This Conditional Approval does not negate the responsibility of the Applicant to comply with this or any other applicable federal, state, or local regulations now or in the future.
7. The facility shall be operated in a manner to prevent the occurrence of sound, dust or odor conditions which cause or contribute to a condition of air pollution as defined in Regulations 310 CMR 7.01 and 7.09.
8. Should asbestos remediation/removal be required as a result of this Conditional Approval, such asbestos remediation/removal shall be done in accordance with Regulation 310 CMR 7.15 and 310 CMR 4.00.

9. Any proposed increase in emissions above the limits contained in this Conditional Approval must first be approved in writing by the Department pursuant to 310 CMR 7.02. In addition, any emissions increase may subject the facility to additional regulatory requirements.
10. No person shall cause, suffer, allow, or permit the removal, alteration or shall otherwise render inoperative any air pollution control equipment or equipment used to monitor emissions which has been installed as a requirement of 310 CMR 7.00, other than for reasonable maintenance periods or unexpected and unavoidable failure of the equipment, provided that the Department has been notified of such failure, or in accordance with specific written approval of the Department.
11. The proposed facility shall be constructed and operated in strict accordance with this Conditional Approval. Should there be any inconsistencies between the Applicant's Non-Major Comprehensive Plan Applications (4B02023, Transmittal No. W025199 and 4B02003, Transmittal No. W025550) and this Conditional Approval, this Conditional Approval shall govern.
12. All provisions contained in existing plan approvals concerning the subject facility issued by the Department to Somerset Power, LLC, and/or previous owners, remain in effect other than those specifically altered herein.

#### **XIV. CONSTRUCTION REQUIREMENTS**

During the construction phase of the proposed modifications at the facility, the Applicant shall ensure that facility personnel take all reasonable precautions (noted below) to minimize air pollution episodes (dust, odor, noise):

1. Facility personnel shall exercise care in operating any noise generating equipment (including mobile power equipment, power tools, etc.) at all times to minimize noise.
2. Construction vehicles transporting loose aggregate to or from the facility shall be covered and shall use leak tight containers.
3. The construction open storage areas, piles of soil, loose aggregate, etc. shall be covered or watered down as necessary to minimize dust emissions.
4. Any spillage of loose aggregate and dirt deposits on any public roadway, leading to or from the proposed facility shall be removed by the next business day or sooner, if necessary.
5. On site unpaved roadways/excavation areas subject to vehicular traffic shall be watered down as necessary or treated with the application of a dust suppressant to minimize the generation of dust.

## **XV. MASSACHUSETTS ENVIRONMENTAL POLICY ACT**

### **A. Natural Gas Reburn Project**

The Department has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Environmental Affairs, for air quality control purposes, was not required prior to this action by the Department. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and Regulation 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions" which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report at a later time.

### **B. Inactive Coal Pile Replacement with a Pre-engineered Sound Barrier**

The Executive Office of Environmental Affairs, MEPA Director in a letter dated January 16, 2002 determined that the replacement of the inactive coal pile with a permanent sound wall was not subject to filing an Environmental Notification Form.

## **XVI. LIST OF PERTINENT INFORMATION**

Name of Facility: Somerset Power, LLC (formally Montaup Electric Company)  
Location: 1606 Riverside Avenue, Somerset, Massachusetts 02726

### Natural Gas Reburn System Project:

Submitted by: Somerset Power, LLC  
Attested to by: John M. Kingsley, P.E. No. 41029  
Date Application Received: August 5, 2002  
Dates Revisions Received: November 7, 2002  
November 26, 2002  
December 19, 2002  
January 10, 2003  
Plans: Typical Natural Gas Reburn System (Fig. 1)  
Machine Location-Cross Section (Drawing No. 8808-FM-100A)  
Roof Plan (Drawing No. 14084-MBSK-1A-1)  
North & South Elevations (Drawing No. 8808-FA-102B)

### Permanent Sound Wall Project:

Submitted by: Somerset Power, LLC  
Attested to by: Paul Farrington, P.E. No. 32619  
Date Application Received: February 6, 2002  
Date Revisions Received: December 19, 2002  
Plans: -1500 Foot Radii and Topographic Contours (Attachment E)  
-Plan and Profile (Attachment F)  
-Sections and Details (Attachment G)  
-Sound Wall Location and Noise Measurement Locations (Fig. 8)

## **XVII. APPEAL PROCESS**

This approval is an action of the Department. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the plan approval is not consistent with the applicable laws and regulations. The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts  
Department of Environmental Protection  
P.O. Box 4062  
Boston, Massachusetts 02211

The request will be dismissed if the filing fee is not paid unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

The Department may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Please be advised that this approval does not negate the responsibility of the Applicant to comply with this or any other applicable federal, state, or local regulations now or in the future. Nor does this approval imply compliance with any other applicable federal, state, or local regulation now or in the future.