



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

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Governor

TIMOTHY P. MURRAY  
Lieutenant Governor

RICHARD K. SULLIVAN JR.  
Secretary

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Commissioner

May 10, 2012

Mr. Lamont W. Beaudette  
Dominion Energy Salem Harbor, LLC  
Salem Harbor Station  
24 Fort Avenue  
Salem, MA 01970

RE: **SALEM** – Metropolitan  
Boston/Northeast Region  
BWP AQ 02 - Comprehensive Plan Application  
310 CMR 7.02  
Application No. MBR-11-COM-004  
Transmittal No. X238706  
**AIR QUALITY PLAN APPROVAL**

Dear Mr. Beaudette:

The Metropolitan Boston/Northeast Regional Office (“NERO”) of the Department of Environmental Protection, Bureau of Waste Prevention, (“MassDEP”), has reviewed your Comprehensive Plan Application, received on August 18, 2011 and supplemented on September 8, 2011, regarding the proposed installation and operation of Selective Non-Catalytic Reduction (“SNCR”) for control of nitrogen oxides (NO<sub>x</sub>) emissions from an existing boiler (Unit 4) at your Dominion Energy Salem Harbor, LLC – Salem Harbor Station facility (“Salem Harbor Station”) located at 24 Fort Avenue in Salem, MA. On September 16, 2011, MassDEP determined your Application to be administratively deficient and issued an Administrative Deficiency Notice. MassDEP received Salem Harbor Station’s response to the Administrative Deficiency Notice on January 30, 2012, and the Application was further supplemented by information received from Salem Harbor Station on March 6, 2012, March 16, 2012 and March 22, 2012. The Plan Application bears the seal and signature of Mr. Glen P. Gordon, Massachusetts P.E. No. 41819.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control,” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the facility owner/operator must comply in order for the facility to be operated in compliance with this Plan Approval.

## **DESCRIPTION OF FACILITY AND APPLICATION**

Salem Harbor Station is subject to Regulation 310 CMR 7.29 Emission Standards for Power Plants as promulgated on May 11, 2001. This regulation imposed new facility-wide emission limits for NO<sub>x</sub>, sulfur dioxide (SO<sub>2</sub>), mercury (Hg), and carbon dioxide (CO<sub>2</sub>). This regulation did not impose carbon monoxide (CO) and particulate matter less than 2.5 microns in aerodynamic diameter (PM<sub>2.5</sub>) emission standards at that time but indicated that development of these emission standards was reserved. This regulation required certain power plants to submit an Emission Control Plan (ECP) that defined how each facility which was subject to 310 CMR 7.29 would comply with its requirements.

MassDEP issued a Final ECP Approval (Application No. 01-729-001, Transmittal No. W025160) to Salem Harbor Station on June 7, 2002, that defined how it would come into compliance with 310 CMR 7.29. Salem Harbor Station appealed the subject Final ECP Approval. On June 19, 2003, MassDEP and Salem Harbor Station entered into an Administrative Consent Order (ACO-NE-03-7001) to resolve the issues raised by Salem Harbor Station's appeal of the ECP Approval. The June 19, 2003 Administrative Consent Order (ACO) included a 310 CMR 7.29 Final ECP Approval, attached as Exhibit D of the ACO. On May 26, 2005, the parties entered into an Amended Administrative Consent Order (ACO-NE-03-7001-AMEND#1). This Amended Administrative Consent Order (AACO) stated that "Dominion may, but is not required by this AACO to, install SNCR on Boiler Unit 4. Dominion shall install any such SNCR in compliance with all applicable federal, state and local laws and regulations."

On March 27, 2012, MassDEP amended the Final ECP Approval included with the June 19, 2003 ACO by issuing a Final Amended ECP Approval (Application No. NE-12-003, Transmittal No. X241756) in accordance with 310 CMR 7.29. MassDEP issued the Final Amended ECP Approval to incorporate strategies, including SNCR installation on Unit 4, to maintain Salem Harbor Station's compliance with 310 CMR 7.29, attain compliance with Best Available Retrofit Technology (BART), and in order for the Commonwealth to meet its obligation to comply with Section 169A of the Clean Air Act to address regional haze, as described in MassDEP's Regional Haze State Implementation Plan (SIP).

Salem Harbor Station, at one time, utilized four existing boilers for electrical power generation. In accordance with a federal Consent Decree (Conservation Law Foundation, Inc. and Healthlink, Inc. vs. Dominion Energy New England, Inc., Case No.: 1:10-cv-11069) and as part of an alternative BART compliance strategy, Salem Harbor Station removed from service (ceased to generate electricity to supply the power grid) two primarily coal-fired boilers, Units 1 and 2, effective December 31, 2011. As a result, Salem Harbor Station submitted an Application (Application No. MBR-11-ERC-001, Transmittal No. X241575) that is currently under review by MassDEP for the Creation of Emission Reduction Credits (ERC) from the shutdown of Units 1 and 2. Furthermore, in accordance with the above referenced Consent Decree and Final Amended ECP Approval, Salem Harbor Station shall remove Units 3 and 4 from service no later than June 1, 2014.

Salem Harbor Station's currently active existing boilers consist of one primarily coal-fired boiler (Unit 3) and one oil-fired boiler (Unit 4) for a total nominal generating capacity of approximately 590 megawatts (MW). Presently, Unit 3 is equipped with Low-NO<sub>x</sub> Burners (LNB) and Selective Non-Catalytic Reduction (SNCR) systems for control of NO<sub>x</sub> emissions, and Electrostatic Precipitators (ESP) for control of particulate matter (PM) emissions. Unit 3 is also equipped with overfire air (OFA) to reduce emissions of NO<sub>x</sub>. Unit 3 combusts low-sulfur coal to limit SO<sub>2</sub> emissions. Unit 4 is presently equipped with LNB and an

ESP to control emissions of NO<sub>x</sub> and PM, respectively, in addition to burning low-sulfur fuel oil (not to exceed 1.0% sulfur by weight) for control of SO<sub>2</sub> emissions.

Salem Harbor Station is proposing to maintain compliance with 310 CMR 7.29 via the installation and operation of a Fuel Tech NO<sub>x</sub> Out, or equivalent, SNCR system to further reduce NO<sub>x</sub> emissions from Unit 4. Additional facility-wide reductions in SO<sub>2</sub> emissions will be achieved by controlling the boiler unit load and/or sulfur content of the fuels burned in each of Units 3 and 4.

A Comprehensive Plan Application submittal and issuance of this 310 CMR 7.02 Plan Approval was required because of potential increases in emissions of collateral pollutants CO and ammonia (NH<sub>3</sub>), which will be created during operation of the Unit 4 SNCR system.

The SNCR system will involve injecting an aqueous solution of urea [(NH<sub>2</sub>)<sub>2</sub>(CO)] into the upper furnace region of Unit 4 where it reacts with NO<sub>x</sub>, in the presence of oxygen (O<sub>2</sub>), to form primarily nitrogen gas (N<sub>2</sub>), water (H<sub>2</sub>O), and CO. For this reaction to occur, the temperature of the flue gas must be in the range of 1,600 Degrees Fahrenheit (F) to 2,200 Degrees F. Below this temperature range excess NH<sub>3</sub> can form, and above this temperature range urea may be converted to NO<sub>x</sub>. On-site storage of dry or liquid urea utilized by the Unit 4 SNCR system will be in existing fully enclosed silos or storage tanks (two tanks, 26,000 gallons of storage capacity apiece) associated with the Unit 3 SNCR system. Adequate storage capacity exists on site such that both SNCR systems will have sufficient urea available to operate as designed.

A 50 percent by weight urea solution will be delivered from the storage tanks to a new circulation module, which will provide feed to a redundant metering module and circulate excess urea solution back to the urea storage tanks. The metering module will automatically control the feed of urea solution and dilution water to a distribution module which will control the feed of urea solution and plant-compressed air to the injectors mounted through the upper furnace walls of Unit 4. Dilution rate, flow and pressure at the injectors will be measured and adjusted to control the droplet size distribution and the release of the urea solution at the correct temperature range inside the furnace. The urea injection rates for each operating load will be established during start-up and optimization of the SNCR system prior to incorporating them into the automatic control process. The urea injection rate will then be automatically adjusted based on maintaining a target NO<sub>x</sub> emission concentration using the boiler unit load and feedback signal from the NO<sub>x</sub> Continuous Emissions Monitoring System (CEMS).

The SNCR retrofit of Unit 4 will result in net increases in potential NH<sub>3</sub> emissions, due to unreacted NH<sub>3</sub> or “ammonia slip”, and in potential CO emissions due to decomposition of urea in the upper furnace region. The current CO emission limit for Unit 4 is 130 parts per million by volume, dry basis, corrected to 3 percent Oxygen (ppmvd @ 3% O<sub>2</sub>), which equates to 0.1014 pounds per million British thermal units (lb/MMBtu). By way of this Comprehensive Plan Application, Salem Harbor Station is proposing an increase in the CO emission limit for Unit 4 to 150 ppmvd @ 3% O<sub>2</sub> or 0.1170 lb/MMBtu and shall limit NH<sub>3</sub> emissions to a target of 5ppmvd @ 3% O<sub>2</sub> or 0.0024 lb/MMBtu (See Special Conditions 4 and 5). The potential increases in CO and NH<sub>3</sub> emissions amount to 328 and 99 tons per year, respectively, based upon 8760 hours of operation per year and a maximum energy heat input of 4,800 million British thermal units per hour (MMBtu/hr) for Unit 4.

However, given that Units 1 and 2 have been removed from service and that the retrofit of Unit 4 with SNCR will reduce NO<sub>x</sub> emissions from the unit, the estimated facility-wide actual emissions of all pollutants, including CO and NH<sub>3</sub>, analyzed are expected to decrease, based on projections that Unit 3

annual capacity utilization will remain unchanged at approximately 55 percent (%) and Unit 4 annual capacity utilization will reduce from approximately 10% to 5%. As such, no net increase in facility-wide emissions is expected; thus, the requirements of Prevention of Significant Deterioration (PSD) do not apply to this proposal. The facility-wide net change in emissions for each pollutant is defined in Table 1 below:

<b>Table 1: Facility-Wide Actual Emissions Change Estimate</b>					
Pollutant	Baseline Actual Emissions <sup>1</sup>		Projected Post-Retrofit Actual Emissions <sup>2</sup>		Facility-Wide Net Change (tpy)
	Units 1, 2, 3 Total (tpy)	Unit 4 (tpy)	Unit 3 (tpy)	Unit 4 (tpy)	
NO <sub>x</sub>	1,385	404	643	165	-981
CO	559	101	262	174	-224
VOC	18	12	8	6	-16
SO <sub>2</sub>	6,616	903	2,931	456	-4,131
SO <sub>3</sub>	78	10	35	5	-48
H <sub>2</sub> SO <sub>4</sub>	96	13	43	6	-59
PM <sub>2.5</sub>	37	5	20	3	-20
PM <sub>10</sub>	85	8	39	4	-50
PM	108	13	61	6	-53
NH <sub>3</sub> <sup>3</sup>	83	10	28	10	-55
F	0	0.47	0	0.24	-0.23

**Table 1 Notes:**

- 1 Baseline Actual Emissions for Units 1, 2, 3 averaged for calendar years 2005 through 2009. Baseline Actual Emissions for Unit 4 averaged for calendar years 2005 and 2006 since 2007 and later not considered representative of normal operation. Annual Capacity Utilization averaged 55.35% for Unit 3 and 9.89% for Unit 4 during these specific calendar years.
- 2 Projected Post-Retrofit Actual Emissions based upon Annual Capacity Utilizations of 55% for Unit 3 and 5% for Unit 4.
- 3 Projected Post-Retrofit Actual NH<sub>3</sub> Emissions based on a not to exceed NH<sub>3</sub> emission limit of 22.7 lb/hr.

**Table 1 Key:**

- tpy = tons per year
- % = percent
- lb/hr = pounds per hour
- NO<sub>x</sub> = Nitrogen Oxides
- CO = Carbon Monoxide
- VOC = Volatile Organic Compounds
- SO<sub>2</sub> = Sulfur Dioxide
- SO<sub>3</sub> = Sulfur Trioxide
- H<sub>2</sub>SO<sub>4</sub> = Sulfuric Acid
- PM<sub>2.5</sub> = Particulate Matter less than 2.5 microns in aerodynamic diameter
- PM<sub>10</sub> = Particulate Matter less than 10 microns in aerodynamic diameter
- PM = Particulate Matter
- NH<sub>3</sub> = Ammonia
- F = Fluoride

Since no new equipment shall be installed outside of enclosed buildings, no increase in sound emissions is anticipated. However, Salem Harbor Station shall comply with 310 CMR 7.10 Noise.

Salem Harbor Station performed a United States Environmental Protection Agency (USEPA) approved computer dispersion modeling analysis for the relevant air pollutants emitted from the facility. The results of the modeling as submitted to MassDEP demonstrate compliance with all of the National Ambient Air Quality Standards (NAAQS), including the new 1-hour NO<sub>2</sub> and SO<sub>2</sub> NAAQS. For the new 1-hour SO<sub>2</sub> NAAQS, air dispersion modeling predicted ambient concentrations are below the NAAQS under the proposed operating scenarios of Units 3 and 4 (See Special Condition 6).

**SPECIAL CONDITIONS**

1. Salem Harbor Station shall submit to MassDEP, in accordance with the provisions of Regulation 310 CMR 7.02(5)(c), the general plans and specifications, as applicable and available, for the construction/alterations approved herein no later than 30 days after commencement of commercial operation of the Unit 4 SNCR system.
2. Salem Harbor Station shall submit Standard Operating and Maintenance Procedures (SOMP) for the proposed new and modified equipment to MassDEP no later than 60 days after commencement of commercial operation of the Unit 4 SNCR system. Thereafter, Salem Harbor Station shall submit updated versions of the SOMP to MassDEP. MassDEP must approve of significant changes to the SOMP prior to the changes becoming effective. The updated SOMP shall supersede prior versions of the SOMP.
3. Salem Harbor Station shall submit to MassDEP an Operating Permit Minor Modification Application pursuant to the requirements of 310 CMR 7.00: Appendix C concerning the proposal approved herein.
4. Salem Harbor Station shall conduct an optimization/minimization testing program regarding the operation of the Unit 4 SNCR system at the facility to insure that the emissions of NH<sub>3</sub> (ammonia slip) are minimized while ensuring adequate NO<sub>x</sub> control. During this testing program, Salem Harbor Station agrees to limit NH<sub>3</sub> emissions to a target of 5 ppmvd @ 3% O<sub>2</sub>, or less (1-hour average). This target number is included in this Plan Approval as a goal and is not incorporated as an applicable requirement herein. However, Salem Harbor Station shall not exceed an NH<sub>3</sub> emission limit of 22.7 pounds per hour (1-hour average) for Unit 4. Salem Harbor Station shall submit a protocol to NERO for each stage of the testing program before initiation of that stage. MassDEP shall be notified a minimum of 14 calendar days before implementation of each stage of field testing to enable witnessing of the test by MassDEP. By the thirtieth day following the end of each calendar quarter, Salem Harbor Station shall submit to MassDEP a progress report on the optimization testing conducted during the quarter.
5. Salem Harbor Station shall not exceed the CO emission limits as specified in Table 2 below:

<b>Table 2: Unit 4 CO Emission Limits</b>			
<b>Pollutant</b>	<b>ppmvd @ 3% O<sub>2</sub><sup>1</sup></b>	<b>lb/MMBtu<sup>1</sup></b>	<b>lb/hr<sup>1</sup></b>
CO	150	0.1170	561.7

**Table 2 Notes:**

1 – Calendar day average, as measured at the stack by CO CEMS.

**Table 2 Key:**

lb/hr = pounds per hour

6. Salem Harbor Station shall not exceed the SO<sub>2</sub> emission limits as specified in Table 3 below:

<b>Table 3: Units 3, 4 SO<sub>2</sub> Emission Limits</b>		
<b>Operating Scenario</b>	<b>Operating Unit(s)</b>	<b>lb/hr<sup>1</sup></b>
Scenario A	3 Only	4,600
Scenario B	4 Only	7,600
Scenario C	3	2,500
	4 In Combination	4,100

**Table 3 Notes:**

1 - One hour average, as measured at the stack by SO<sub>2</sub> CEMS.

**Table 3 Key:**

lb/hr = pounds per hour

7. Salem Harbor Station shall notify MassDEP in writing within 10 days after commencement of commercial operation of the Unit 4 SNCR system.
8. Salem Harbor Station shall ensure that the proposed modifications meet, at minimum, MassDEP's Noise Policy 90-001 (<http://www.mass.gov/dep/air/compliance/facts.htm#noisepol>) and comply with 310 CMR 7.10.
9. In accordance with 310 CMR 7.13, MassDEP may require additional emissions testing of the facility at any time to ascertain compliance with MassDEP's Regulations and/or this Plan Approval.
10. Salem Harbor Station shall maintain a complaint log concerning emissions, odor, dust, and noise from the facility. Salem Harbor Station 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 on site for the most recent five (5) year period. The complaint log shall be made available to MassDEP upon request. Salem Harbor Station shall take all reasonable actions to respond to any complaints received by the facility in a timely manner.
11. A record keeping system shall be established and maintained on site by Salem Harbor Station. All records shall be maintained up-to-date such that year-to-date information is readily available for MassDEP examination upon request. The record keeping log/system, including any other "credible evidence", 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 emission limits contained in this Plan Approval. Such records shall include, but are not limited to, fuel usage rate, 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 of the proposed emission 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.
12. Salem Harbor Station 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 MassDEP upon request.
13. Salem Harbor Station shall maintain a log to record problems, upsets, or failures associated with the proposed SNCR emission control system serving Unit 4.
14. Salem Harbor Station shall notify MassDEP by telephone, fax, or e-mail no later than three (3) business days after the occurrence of any upsets or malfunctions to the 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.

#### **GENERAL CONDITIONS**

1. Salem Harbor Station shall properly train all personnel to operate the proposed SNCR control equipment in accordance with vendor specifications and this Plan Approval.
2. All requirements of this Plan Approval that apply to Salem Harbor Station shall apply to all subsequent owners and/or operators of the facility.
3. Salem Harbor Station shall maintain the Standard Operating and Maintenance Procedures for all air pollution control equipment in a convenient location (e.g., control room/technical library) and make them readily available to all employees and MassDEP.
4. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the facility, then the Salem Harbor Station shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
5. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this facility, Salem Harbor Station shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
6. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this facility, Salem Harbor

Station shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.

7. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), Salem Harbor Station shall allow MassDEP and/or USEPA personnel access to the facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
8. This Plan Approval does not negate the responsibility of Salem Harbor Station to comply with any other applicable Federal, State, or local regulations now or in the future.
9. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
10. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
11. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
12. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by Salem Harbor Station to amend the Plan Approval conditions.
13. Salem Harbor Station shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
14. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), Salem Harbor Station shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

## **MASSACHUSETTS ENVIRONMENTAL POLICY ACT**

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. 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 (EIR) at a later time.

## **APPEAL PROCESS**

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

MassDEP 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.

Should you have any questions concerning this Approval, please contact Cosmo Buttaro by telephone at (978) 694-3281, or in writing at the letterhead address.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

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Cosmo Buttaro  
Environmental Engineer

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

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James E. Belsky  
Regional Permit Chief  
Bureau of Waste Prevention

cc: Conservation Law Foundation, 62 Summer Street, Boston, MA 02110-1016  
Board of Health, 120 Washington Street, 4<sup>th</sup> Floor, Salem, MA 01970  
Fire Headquarters, 48 Lafayette Street, Salem, MA 01970  
City Hall, 93 Washington Street, Salem, MA 01970  
MassDEP/Boston – Yi Tian (E-Copy)  
MassDEP/NERO – Marc Altobelli (E-Copy), Mary Persky, Cosmo Buttaro