



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
New England Regional Laboratory
Laboratory Services and Applied Science Division
11 Technology Drive, North Chelmsford, MA 01863

Report Memorandum

Drafted: September 12, 2021
Finalized: September 30, 2021

Subject: Stack Emission Testing Observations – Hudson Power and Light

From: William Osbahr, Stack Test Coordinator, Field Services Branch /WAO/

Through: Jerry Keefe, Team Leader, Field Services Branch /JCK/

To: Christine Sansevero, Chief, Air Compliance Section

Facility Information

- A. Facility Name: Hudson Power and Light
- B. Facility Location: 77 Cherry Street, Hudson, Massachusetts 01749
- C. Facility Contact: Brian Choquette
- D. ICIS-Air #: MA0000002511900904

Background Information

- A. Date of test: 8/12/2021
- B. US EPA Representative: William Osbahr
- C. Federally Enforceable Requirements Investigated: NSPS Subpart ZZZZ

Disclaimer:

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Attendees

Name	Company	Role
William Osbahr	USEPA	Stack Test Coordinator
Adam Hopkins	Hudson	Plant Superintendent
Brian Choquette	Hudson	General Manager
Donna Oehm	Power Plant Compliance	Lead Consultant
Ray Oehm	Power Plant Compliance	Equipment Technician

Observations:

The purpose of this memorandum is to provide a summary of my observations made during a pretest visit at Hudson Power and Light (Hudson).

I arrived at Hudson on August 12, 2021 at 9:30 am.

I met with Ms. Oehm, Mr. Hopkins, and Mr. Oehm. Mr. Choquette also attended the group at the start of the visit. I presented my credentials to each representative at the start of the meeting.

While on site, we toured the generator building.

Ms. Oehm explained the latest QA/QC procedures that she and Mr. Oehm performed on the CPMS. They had recently updated portions of the inlet temperature and delta P systems. They performed calibrations on each of the systems. Ms. Oehm stated that she would provide an addendum via email for the protocol which would explain the latest CPMS improvements and calibrations.

We discussed the method by which Hudson would record kw data for the test. Ms. Oehm explained that Hudson does not have a means of electronically recording kw levels of their generators. Ms. Oehm explained that the generators operate at very stable loads. Ms. Oehm stated that Mr. Oehm would be manually recording data for several parameters during the test. She stated that he would log load levels for all runs. We agreed that manual recording of kw load every 10 minutes would be acceptable for all engines during the test.

During the visit, we agreed to alter the engine schedule slightly and M. Oehm would include that in the email addendum.

Ms. Oehm explained the diesel mix for the dual fired generators. The Hudson's dual fired engines will have a slight amount of diesel burned in the gas mode. During gas operations the engines burn only 4-7% of the capacity from the diesel input. This ratio is internally fixed within the engine operations. It cannot be altered, increased, or shifted in any way.

Ms. Oehm stated that she would provide an email with a statement addressing and summarizing items discussed during this visit. Additionally, she would provide an updated schedule for the engine testing.

On 8/23/2021 at 6:33 AM, Ms. Oehm provided an email satisfying these last outstanding issues for the test.

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