



**Public Service
of New Hampshire**

780 N. Commercial Street, Manchester, NH 03101

Public Service Company of New Hampshire
P. O. Box 330
Manchester, NH 03105-0330
(603) 634-2700
Fax (603) 634-2438

landilt@psnh.com

The Northeast Utilities System

Linda T. Landis
Senior Counsel

December 6, 2013

Sharon M. DeMeo
Environmental Engineer
U.S. Environmental Protection Agency – Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

**Response of Public Service Company of New Hampshire
to EPA Information Request Related to Merrimack Station
Flue Gas Desulfurization Wastewater Treatment System Effluent**

Dear Ms. DeMeo:

Enclosed please find the responses of Public Service Company of New Hampshire ("PSNH") to the Information Request received from the United States Environmental Protection Agency ("EPA") on November 14, 2013, related to the Merrimack Station flue gas desulfurization wastewater treatment system effluent.

Please let us know if there is any area of the inquiry which requires additional information or clarification. Any questions regarding this information should be addressed to:

Linda T. Landis, Esq.
Senior Counsel
Public Service Company of New Hampshire
780 No. Commercial Street
P.O. Box 330
Manchester, New Hampshire 03105-0330

Robert P. Fowler, Esq.
Attorney
Balch & Bingham LLP
1901 Sixth Avenue North
Suite 1500
Birmingham, Alabama 35203-4642

E-Mail: Linda.Landis@psnh.com
Phone: 603-634-2700

E-Mail: rfowler@balch.com
Phone: 205-226-8733

Sincerely,

Linda T. Landis
Senior Counsel

OVERVIEW OF PSNH RESPONSE TO SECTION 308 INFORMATION REQUEST

In accordance with the instructions provided in EPA's Request for Information dated November 8, 2013, PSNH is providing responsive information from January 2013 through October 2013. Responsive information relevant to period prior to January 2013 has already been provided to EPA via a series of electronic submittals and the May 7, 2012 PSNH information response.

The last monthly status report provided to EPA was in November 2012 (please note that no offsite shipments were made in November and December 2012). This was consistent with our understanding as put forth in a series of communications, including PSNH's May 7, 2012 response to the March 2012 Information Request, and a number of electronic transmittals from Allan G. Palmer, Senior Engineer, PSNH, to John P. King, EPA, dated September 19, 2012; September 28, 2012; October 18, 2012; and December 19, 2012.

No wastewater was shipped offsite in November and December 2012; and April, May, July, September, and October 2013.

Question 1(a)-1(b)(i)-(iv). The enclosed monitoring reports (arranged chronologically) submitted to FGD wastewater recipient POTWs provide the trucking dates, the volume of pre-treated FGD wastewater, and the specific type of pre-treated FGD wastewater sent to the POTW. See specifically Table 2 in each report. The reports also include extensive analysis of FGD pre-treated wastewater samples.

Question 1(b)(v). Subject to the statements in, and documents included with, PSNH's May 7, 2012 response to EPA's March 22, 2012 Information Request, neither PSNH nor its consultants have performed any additional analyses specifically to address the limits that are contained within the permits issued to the POTWs by state and/or federal authorities or to analyze the effect of various entities' shipments on the water bodies into which the POTWs discharge. The monitoring reports provided in response to the preceding question, however, demonstrate that PSNH is shipping pre-treated FGD wastewater that meets all conditions, limitations, and requirements set forth in permits issued to PSNH by the receiving POTW and thus PSNH is in compliance with all its legal obligations.

Question 1(b)(vi). The only correspondence PSNH has filed with EPA or NHDES within the specified timeframe, other than the above referenced monthly reports, is attached. Please note that the detailed proprietary schematic included with that correspondence is labeled Confidential and Proprietary Information and should be segregated from the rest of this 308 response and treated as is appropriate for Confidential Business Information, pursuant to the procedures set forth in 40 C.F.R. Part 2.

Question 1(b)(vii). In each case, it was a business decision reached after consideration of multiple factors that may have included continued optimization of the secondary wastewater treatment system ("SWWTS") or individual components of that system; necessary adjustments based on fuel blends, load changes on either unit, or changes in chemistry due to Absorber optimization; operation of individual components or a combination of components of the SWWTS; operational constraints (other than the SWWTS); maximizing systemic Station operation when generating for a short time period.

Question 2. Only information that has not already been provided and that is existing at the time the information request was received is being provided.

Question 3. No response needed.

Question 4. The information is being provided in hard copy due to significant staffing limitations. We will have the information transferred to a disc but it will not be within the 20 day timeframe.

PSNH requests that the monthly reports to be provided going forward be due by the end of the following month, rather than the 15th, since many of the samples need to be shipped to Seattle for analysis.

PSNH has attempted to provide a complete production in response to this information request in the very limited time provided. However, PSNH reserves the right to supplement this submittal if additional documents or information responsive to the request become known or available to PSNH.