



**Public Service
of New Hampshire**

AR-1277

PSNH Energy Park
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(603) 669-4000
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March 23, 2010

The Northeast Utilities System

D28906

Ms. Joy J. Hilton
U.S. Environmental Protection Agency
Region I
1 Congress Street
Suite 1100
Mail Code: OES04-3
Boston, MA 02114-2023

Reference: NPDES Permit No. NH0001465, Merrimack Station, Public Service Company of New Hampshire, issued June 25, 1992, modified October 22, 1992.

Dear Ms. Hilton:

Merrimack Station
Five Day Noncompliance Notification

In compliance with Part II, Section D.1.e., of Merrimack Station's NPDES Permit No. NH0001465 (see Reference), Public Service of New Hampshire (PSNH) submits this five day noncompliance notification letter. The noncompliance involved the concentration of iron in the effluent from the wastewater treatment pond weir during a routine discharge from Outfall 003A. The event was initially described to both you and Tom Croteau of the NHDES in telephone voicemails from Allan Palmer of PSNH on Friday, March 19, as soon as the noncompliance was detected.

A grab sample was collected at Outfall 003A on March 17 and analyzed for iron on March 18 with a result of 1.2 mg/l, exceeding the 1.0 mg/l limit. All other parameters were in compliance. Based on the data available, it does not appear that the noncompliance is a result of the discharge from the wastewater treatment facility as it was measured to have an iron concentration of 0.25 mg/l. We believe that the iron concentration in the pond was the result of heavy rains earlier in the week and were impacted by on-site construction activities. In addition to the large amount of disturbance that is underway associated with the erection of a flue gas desulfurization system, a small section of the treatment pond has been isolated with steel sheet piling to install a pump station to recycle wastewater. We believe excavation work for the pump station, in conjunction with the steel walls, may have contributed additional loading of iron to the pond waters. The volume of water discharged from the pond on the day of the noncompliance was 4.9 million gallons.

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Construction activities are tightly controlled by rigorous compliance with a Stormwater Pollution Prevention Plan (SWPPP). Site grounds and housekeeping practices are closely monitored to protect stormwater runoff. This event will be reviewed with the SWPPP team to identify potential sources of pollutants and provide incremental safeguards and practices if and where appropriate. Additionally, plans have been initiated to dredge the treatment pond in the near future to restore it to full storage capacity and increase the retention time.

If you have any questions regarding this matter, please contact Allan Palmer at (603)634-2439.

Very truly yours,

A handwritten signature in cursive script, reading "William H. Smagula", is written over a horizontal line.

William H. Smagula
Director, Generation

cc: Thomas J. Croteau - NHDES