

**Stein, Mark**

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**From:** King, John Paul  
**Sent:** Monday, August 19, 2013 1:56 PM  
**To:** DeMeo, Sharon M.; Stein, Mark; Houlihan, Damien; Jordan, Ronald  
**Subject:** RE: Request for Additional Merrimack Station FGD Information

Some more information concerning the periodic trucking of Merrimack Station FGD "liquid" to local POTWs. I use the term "liquid" because I did not specifically ask Allan Palmer whether it was VCE distillate, or treated effluent from the FGD wastewater treatment system. Allan P. did explain that with Merrimack Station not being dispatched that often to generate. Since the Station does not operate for long periods of time, as compared to previous years, it is difficult to tune and stabilize the operation of the VCE. The constant adjusting of the VCE apparently produces distillate that needs to be truck to a POTW. Further, there might also be excess FGD effluent that cannot be feed back to the FGD after it is shutdown.

John

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**From:** King, John Paul  
**Sent:** Tuesday, August 13, 2013 10:39 AM  
**To:** Allan Palmer; Stein, Mark; [landilt@nu.com](mailto:landilt@nu.com)  
**Cc:** DeMeo, Sharon M.; Houlihan, Damien  
**Subject:** Request for Additional FGD Information

Allan,

Thank you for returning my call yesterday. It was, as always, an interesting conversation.

As we discussed yesterday, I am sending the two questions concerning the FGD's operation I poised to you.

1. Is the salt cake from the VCE system a stable solid that can be disposed in a common landfill, or does the cake contain hygroscopic salts that require special processing for disposal?
2. Confirm whether or not FGD distillate, wastewater, etc. has sent to area POTWs since October 2012.

Any clarifying or background information associated with the replies to these questions will be appreciated. Additionally, please included Sharon on all replies to this email.

Linda and Mark,

Allan indicated during our August 12<sup>th</sup> conversation that FGD distillate periodically is sent off site to a POTW. I stated to Allan that PSNH needs to provide a monthly report concerning off site transport of FGD distillate. This requirement is in accordance with EPA §308 letter of March 22, 2012. Allan countered that PSNH had met all the requirements of that §308 letter, and no further reporting is required. Since I did not want my conversation with Allan to become a heated discussion over the interpretation of EPA §308 letter reporting requirements, I ask the attorneys representing our respective organizations to discuss this matter. (Please note Linda that Mark is on vacation, but I will bring this matter to his attention when he returns ... a few days after he returns.)

Thank you for your attention to this matter,

John