

**PSNH Response to EPA-Merrimack Station SWWTS****linda.landis** to: Mark Stein

12/20/2012 09:46 AM

Cc: william.smagula, elizabeth.tillotson, allan.palmer, rfowler, "Taylor, Spence"

From: linda.landis@nu.com

To: Mark Stein/R1/USEPA/US@EPA

Cc: william.smagula@nu.com, elizabeth.tillotson@nu.com, allan.palmer@nu.com, rfowler@balch.com, "Taylor, Spence" <staylor@balch.com>

History: This message has been replied to and forwarded.

Mark: This responds to the four general queries from EPA concerning the secondary wastewater treatment system (SWWTS) at Merrimack Station. As I have said in earlier conversations, the Station was not online until the end of November. We are still within what we consider a start-up period with the SWWTS, and as with any new equipment or system, we are in the tuning and adjustment optimization phase, operating equipment and adjusting chemicals as necessary to seek best and reliable operations. We will need 6-9 months of consistent operations before we are able to provide you with accurate operational data. This response is necessarily limited given the limited factual data that we have at this time.

We provide the following responses for your consideration.

1. Please provide us with a process flow line diagram (or, if necessary, multiple diagrams) showing the components of the primary and secondary FGD wastewater treatment systems. We already have this type of diagram for the primary FGD wastewater treatment system. This line diagram (or diagrams) should illustrate: (a) each component of the treatment systems, including any pretreatment softening step; (b) the order in which the components are connected with each other; (c) the flow rates of wastewater flowing between the components; (d) the location, amounts, and types of any chemical additions to the wastewater; and (e) the types and amounts of products or wastes that are emitted or produced for reuse or disposal (e.g., volumes of wastewater; amounts of solid waste). In addition, the diagram or diagrams should illustrate all of the modes in which the treatment system may be operated (e.g., if the system might be operated with or without using a particular component of the treatment system, this should be identified in the diagrams).

Please see the attached process flow diagram illustrating the primary and secondary FGD wastewater treatment systems.

2. We are interested in understanding the extent to which Merrimack Station has operated all or part of the secondary FGD wastewater treatment system to date.

PSNH has operated the SWWTS in its entirety. The system is

considered to be in an optimization phase with adjustments to the process continuing to take place depending on a number of variables.

3. We are interested in hearing about your operational experience in running the secondary treatment system. To the extent the system has been used in different modes of operation, we are interested your operational experience in these different modes.

PSNH's experience in running the SWWTS is extremely limited at this early stage, and, as a result, we do not have accurate data related to the SWWTS operations at this point. During this optimization phase, systems are being tuned and balanced, chemicals adjusted. There has been limited operation in each operational mode, with the primary focus on full system integrated use. We are not comfortable providing our "impressions" related to the system operation--such preliminary data has not been adequately verified and is likely to be inconsistent.

4. We are interested in discussing your experience regarding the energy needed to operate the secondary FGD wastewater system, and whether the energy used to operate the secondary FGD wastewater treatment system affects electrical generating efficiency at Merrimack Station.

The contractually guaranteed value solely for the SWWTS is 1.4 MW. This does not include the physical-chemical system.

We believe we will be able to provide you with a more complete response to your questions once we complete the optimization phase and adjustment process.

We were not able to respond to your request as quickly as we had hoped. As you know, we just filed our response to another Section 308 request for information last Monday. Because of limited resources here at PSNH and the need to focus on our core business, we were not able to consider new information-seeking queries until that earlier filing was complete. In addition, it is required by contract and by separate agreement with the vendor that we discuss in advance any potential or intended disclosures regarding the SWWTS. This technology is highly proprietary as is the adaptation of that technology to our Station and its operational needs.

Please give me a call once you have had a chance to review our response if you would like to discuss further.

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