

Memorandum to Merrimack Station NPDES Permit File

Re: Conference Call between EPA and Granite Shore Power (GSP)

Date: 4/29/2020

Attendees on the call: Elizabeth Tillotson, GSP, Allan Palmer, GSP, Damien Houlihan, EPA, and Sharon DeMeo, EPA

This call was to clarify certain issues regarding Merrimack Station's coal pile runoff. Information learned during this call includes the following:

- The company has not had an issue with the coal pile emitting dust into the air. They do have the capability to spray the pile with water, but they do not need to do so routinely.
- There is a trench system on both sides of the coal pile. The west side trench system is adequate to contain and infiltrate the stormwater runoff from the coal pile. The east side trench system also allows for infiltration into the ground but also flows southerly to an old oil tank containment area, located southeast of the pile, which also allows for the runoff to percolate through the ground.
- There is no risk that the combined trench system would overflow, even given a 10- or 20-year storm event.
- Prior to the early 1980's, there were three to four catch basins around the coal pile that discharged directly to the Merrimack River (possibly known as Outfall 002 in an older permit).
- During the early 1980's the catch basins were sealed, and the trench system was built.
- PSNH included in the most recent application, the option of discharging (by trucking) coal pile runoff to the slag settling pond via waste treatment plant #1. Yet, this has never occurred.
- GPS agrees that it is unnecessary to continue to include coal pile runoff as an authorized discharge under the permit.
- The slag settling pond is also not lined and therefore wastewater percolates through the ground underneath. The company does not consider the slag settling pond as an ash pond covered by the CCR Rule; it is considered an NPDES pond.
- The geology of the land mass below the plant is unknown, though PSNH found that it was easy to drill wells and that it is likely a sandy environment.