



Public Service  
of New Hampshire

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The Northeast Utilities System

June 11, 2009

**By Overnight Mail**

David Webster  
Office of Ecosystem Protection  
United States Environmental Protection Agency  
One Congress Street, Suite 1100, Mail Code CMA  
Boston, MA 02114-2023

**Re: Public Service Company of New Hampshire  
Merrimack Station  
National Pollutant Discharge Elimination System Permit No. NH0001465**

Dear Mr. Webster:

Public Service Company of New Hampshire ("PSNH") is providing the enclosed report, entitled *Biocharacteristics of Yellow Perch and White Sucker Populations in Hooksett Pool of the Merrimack River*, prepared by Normandeau Associates, Inc. dated June 2009, for inclusion in the administrative record for the National Pollutant Discharge Elimination System permit for PSNH's Merrimack Station in Bow, New Hampshire (the "Permit").

This report presents the results of supplemental Clean Water Act ("CWA") §316(a) studies that Normandeau performed during 2008 with respect to two abundant Representative Important Species ("RIS") fish populations, yellow perch and white sucker, found in the Merrimack River near the Station. Normandeau sampled these populations during the spring and fall seasons in 2008, collected biological characteristics information relevant to United States Environmental Protection Agency ("EPA")-identified population-level response metrics (including length, weight, age, fecundity and incidence of disease or parasitism) and evaluated whether there was evidence of prior appreciable harm to either RIS. In short, the study's results support a finding of no prior appreciable harm from Merrimack Station's thermal discharge to the yellow perch and white sucker populations found in the river near the Station.

Please note that PSNH shortly will provide two additional reports to EPA and the New Hampshire Department of Environmental Services for inclusion in the administrative record for the Permit. The first report will provide Enercon Services, Inc.'s engineering analysis of three additional alternative cooling water intake structure ("CWIS") technologies identified by EPA this past December as requiring further study: (1) seasonal deployment of narrow slot wedgewire screens in front of the existing CWISs, (2) seasonal deployment of an aquatic filter barrier in front of the existing CWISs, and (3) installation of fine mesh traveling screens to replace the existing coarse mesh traveling screens. As you will recall, EPA specifically directed PSNH to prepare and submit this additional engineering study at our December 4, 2008 meeting, as a supplement to the technology evaluation already provided to EPA in response to the July 31, 2007 CWA §308 letter. The second forthcoming report will present Normandeau's analysis of Merrimack River ambient pH between June 2002 and May 2007.

PSNH respectfully requests EPA to review and consider each of these new reports prior to issuing a draft NPDES permit for the Station, to ensure that the draft permit is based on accurate facts and appropriately reflects and responds to fisheries conditions in a manner consistent with applicable law.

This correspondence respectfully reserves PSNH's rights to challenge any aspect of the Permit that EPA ultimately issues for the Station. Nothing herein is intended to, or should be in any way construed, as waiving PSNH's rights with respect to any pending considerations. Please feel free to call me if you have any questions.

Very truly yours,



William H. Smagula, P.E.  
Director - PSNH Generation

cc: Linda T. Landis, Esq.  
Elise N. Zoli, Esq.