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of New Hampshire

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The Northeast Utilities System

Linda T. Landis
Senior Counsel

February 10, 2010

Stephen S. Perkins, Director
Office of Ecosystem Protection
USEPA
One Congress Street, Suite 1100
Boston, MA 02114-2023

Re: Information Request, NPDES Permit No: NH 0001465

Dear Mr. Perkins:

On January 25, 2010, Public Service Company of New Hampshire ("PSNH") received a supplemental Information Request pursuant to Section 308 of the Clean Water Act related to the draft NPDES Permit No. NH0001465 for Merrimack Station ("the Station") in Bow, New Hampshire. PSNH responded on January 29 with a requested 150-day extension which, by letter dated February 4, 2010, the Environmental Protection Agency ("EPA") denied. PSNH immediately relayed this information to our consultant, Enercon Services, who will be providing the requested data, clarifications, and analyses essential to an accurate and complete response.

Enercon, after carefully reassessing the supplemental Information Request and its technical resources, has responded to us that even though the technical resources familiar with the issues (the original report preparers) will be dedicated to this effort, the timeframe provided by EPA is unrealistic given the effort required by the various requests. We therefore are providing the following breakdown of the challenges presented by the fifteen requests.

Request 1 requires a clarification of what was provided in the report; this will entail a careful review of the Btu load defined by EPA to ensure that the defined thermal output of the plant is correctly stated and reviewed by Station personnel.
Requests 2, 3, 4, 5, and 11 will be provided in a timely manner.
Requests 6 and 8 each consist of several questions requiring clarification of what was provided in the report as well as a monthly blowdown tabulation.
Requests 7, 9, 10, 13, and 14 require explanation of the empirical analyses which will be time consuming in that intensive review will be needed in order to describe not only the equations/data but also the methodology used to define each empirical relationship. It is

assumed that all empirical analyses will be packaged together since if done separately, each would require a separate write-up which would be even more time consuming. Request 12 consists of several questions requiring review of cooling water process flow diagrams and possibly additional analysis using data from the Station. The 2007 analysis was done empirically and included all heat sources rejected to the discharge canal. Our consultant contends that to separate cooling equipment, particularly at the level of what additional heat is provided by each piece of equipment, will likely require a significant amount of effort.

Request 15 consists of several questions requiring a detailed explanation of the 2007 empirical analysis. Assembling the large amount of data requested will require significant effort. Since this request summarizes the output from several of the other requests, it must be done last.

We hope this breakdown of the challenges presented by the individual requests provides adequate clarification to EPA as well as justification for the following proposed staggered response:

- Responses 1-5 and 11 to be provided by February 24th;
- Responses 6 and 12 by March 31st
- All remaining information by June 24th.

We do understand EPA's need for this information and we will accordingly strive to provide the information as soon as possible. We believe this proposed schedule, in that it will enable us to provide complete and accurate responses, is in the best interests of both EPA and PSNH. Please call Allan Palmer (603-634-2439) or me if you have any concerns about our interpretation of the requests or our proposed response schedule.

Yours truly,



Linda T. Landis
Senior Counsel

cc: John Paul King, EPA
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