



**Public Service
of New Hampshire**

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The Northeast Utilities System

Linda T. Landis
Senior Counsel

July 7, 2010

By Overnight Mail

Mr. John Paul King, Environmental Scientist
U.S. Environmental Protection Agency
5 Post Office Square Suite 100 (OEP06-04)
Boston, Massachusetts 02109-3912

**Re: Public Service Company of New Hampshire
Merrimack Station
National Pollutant Discharge Elimination System Permit No. NH0001465
Response to Information Request in Support of NPDES Permit Reissuance**

Dear Mr. King:

Public Service Company of New Hampshire ("PSNH") herewith responds to the United States Environmental Protection Agency's ("EPA's") request that PSNH provide additional information and clarification of PSNH's initial §308 Response (dated November 2007) regarding Merrimack Station in Bow, New Hampshire. This information is being provided to assist EPA in the renewal of the Station's existing National Pollutant Discharge Elimination System ("NPDES") permit, including renewal of the Station's existing CWA §316(a) variance pursuant to EPA regulations governing such renewals.

As provided in EPA's letter dated February 18, 2010, PSNH has submitted the information in accordance with a three-tiered schedule. This third response provides the information requested by queries 7-10 and 13-15. The information, as with the prior two submittals, has been integrated into the report (*Response to the Environmental Protection Agency's Information Request for NPDES Permit Re-issuance, PSNH Merrimack Station Units 1 & 2, Bow, New Hampshire*) prepared for PSNH by Enercon Services, Inc.

PSNH respectfully reminds EPA that it has submitted both its initial §308 response and its three-part response to EPA's January 2010 supplemental §308 information request for the purpose of providing technology and fisheries information specifically requested by EPA. In particular, PSNH notes that the thermal and biological monitoring data collected in Hooksett Pool and

upper Amoskeag Pool since 1967 provide no historical evidence that Merrimack Station's thermal discharge may reasonably be considered to have caused any prior appreciable harm to the balanced indigenous population or community of shellfish, fish and wildlife that reside within, or are migratory through, the Merrimack River in the sphere of influence of the Station's hydrothermal regime. In fact, the strength of the historical evidence assures the continued protection and propagation of the balanced indigenous population. Similarly, the biological data from the Station's monitoring programs indicate that no adverse environmental impact to the aquatic ecosystems of the Merrimack River in the vicinity of the Station has occurred, as measured by any representative important species or critical aquatic organism population, as a result of the Station's existing cooling water intake operation.

This correspondence respectfully reserves PSNH's rights to challenge any aspect of the Permit that EPA ultimately issues for Merrimack 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 do not hesitate to contact me (603-634-2700) or Allan Palmer (603-634-2439) with any questions or concerns you may have regarding this submittal.

Very truly yours,

Linda T. Landis

Linda T. Landis
Senior Counsel

cc: Allan Palmer, PSNH
William H. Smagula, P.E., PSNH
Elise N. Zoli, Esq., Goodwin Procter