



August 7, 2009

Michele Andy, Administrator
Permitting and Environmental Health Bureau
NH Dept of Environmental Services
Air Resources Division
PO Box 95
29 Hazen Drive
Concord, NH 03302

RE: Public Comment Period and Public Hearing Regarding Draft Title V Permit
PSNH – Merrimack Station
Facility ID #3301300026; Application #FY96 – TV048

Dear Ms Andy:

Thank you for your July 31, 2009, letter regarding the Draft Title V Operating Permit for the Public Service Company of New Hampshire Merrimack Station, Bow, NH. We are pleased that the public Title V process has commenced for Merrimack Station, a major source of Clean Air Act regulated pollutants, including hazardous pollutants such as mercury. The Application for this permit was filed on July 1, 1996, over 13 years ago.

You have scheduled the public hearing on the Draft Title V Permit on September 3, 2009. The written comment deadline is September 18, 2009.

The public hearing date and comment deadline are unacceptable. The dates provide insufficient time for the critically important public participation process regarding the Draft Title V Permit.

September 3, 2009, the date of the public hearing is the Thursday evening before the long Labor Day holiday. It is not uncommon for people to make plans for this holiday months, and sometimes much longer, in advance. The date will make it difficult, if not impossible, for the much of the public to properly examine and express comments on this major permit.

The September 18, 2009, comment deadline does not provide adequate time to examine the draft permit, the underlying data, emissions limits and compliance with the Clean Air Act

In addition to the concern we have about the impossibly short public participation timeline, there are matters pending that may have substantial consequences for the final Title V permit, including:

1. In the Matter of the Temporary Permit TP – 0008 Public Service Company of New Hampshire Merrimack Station, Docket No. 09 – 10, 09 – 11, New Hampshire Department of Environmental