

Admin #
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NPDES Permit

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October 3, 1974

Mr. Jeffrey E. Miller, Director
Enforcement Division, Permits Branch
John F. Kennedy Federal Building
Boston, Massachusetts 02203

Subject: NPDES Application, Public Service Company of New Hampshire,
Herrimack Station

Dear Mr. Miller:

I have reviewed Public Notice NH-17-75 application for Public Service Company of New Hampshire to discharge from the Merrimack Station 287,000,000 gallons per day of condenser cooling water into the Merrimack River at Dover, New Hampshire, a Class B cold water fish area. The proposed permit is not acceptable to the New Hampshire Fish and Game Department as it does not meet cold water standards which this department has previously requested (see attached letter January 16, 1974, Director Bernard W. Corson to William Healy, Executive Director).

This department cannot accept temperature discharge at a maximum 90° F. or a 20° F. temperature rise. We have requested on January 16 that a rise of no more than 1° F. measured at any point in the water column at Station (S-4) be permitted after the spring of 1975 when ambient temperatures are in excess of 68° F. At no time should a temperature rise in excess of 5° F. be permitted at any point in the water column as measured at Station (S-4). State standards further call for a rate of change measured at this Station not in excess of 1° F. per hour.

This department believes the above conditions are essential as we are currently engaged in an anadromous fish restoration program in the Merrimack River. Shad eggs have been successfully planted for several years. An anadromous salmon hatchery located at Milford, New Hampshire will be completed this fall and salmon will be raised and stocked in the Merrimack River.

In addition to the above comments, a review of past monitoring studies will indicate as stated by Director Corson that they appear

to be "...haphazard and capricious". Annually, during the warm summer months, the down stream monitoring has been reported out of service a great deal of the time. Remedial measures should be taken to assure that either continuous monitoring at Station S-4 be provided or that the canal system be redesigned in such a manner as to make it physically impossible to exceed a temperature rise of 1° F. at S-4.

Sincerely,

Arthur E. Newell, Supervisor
Fisheries Research

AEN:llp

cc: Russell Nylander
Donald Stever
Bernard W. Corson, Director

COMMUNICATIONS SECTION

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