

3.



"Knowland, Liz"  
<Liz.Knowland@des.nh.gov>  
04/10/2009 01:29 PM

To <msmith@orr-reno.com>  
cc "Andrews, Jeff" <Jeffrey.Andrews@des.nh.gov>, "Demas, Peter" <Peter.Demas@des.nh.gov>, "Spanos, Stergios" <Stergios.Spanos@des.nh.gov>,  
bcc

Subject FW: PSNH WWTF for new Mercury Scrubber Project

Dear Attorney Smith,

Following our conversation late yesterday afternoon, Jeff Andrews delivered documents from the NPDES file for PSNH. These are the only documents within the file pertaining to the new mercury scrubber waste water treatment plant. Jeff reviewed each of the applicable documents with Attorney Mulholland and no document discussed was deemed privileged or confidential.

Please note in the "Clean Air Project" presentation, on page 9, under the heading of "Upcoming", a Fall 2008 target date included the NPDES Permit for the WWTP addition. To date, the NH Department of Environmental Services has not received an NPDES Permit application from PSNH for this specific project.

If you have any questions regarding the contents of this attachment, we would request that you refer them to Evan Mulholland. If I can be of further assistance, please don't hesitate to contact me.

Sincerely,

Liz Knowland

Elizabeth Knowland  
File Review Coordinator  
(603) 271-8808  
Elizabeth.Knowland@des.nh.gov

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PSNH NPDES INQUIRY.pdf



**Andrews, Jeff**

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**From:** Spanos, Stergios  
**Sent:** Tuesday, May 13, 2008 3:26 PM  
**To:** Drew, Tim; EPA John King (king.john@epa.gov)  
**Cc:** Walls, Michael J.; Heitzler, Paul; Stewart, Harry; Andrews, Jeff  
**Subject:** PSNH meeting yesterday

Hi Tim (& John)

At yesterday's meeting with PSNH on their new \$250M wet scrubber (APC), which Jeff and I attended, I told Alan Palmer of PSNH, in front of PSNH's lawyers and the others in attendance, that they need to update their NPDES permit application with information on the new wastewater stream (namely a stream that will come from their new gypsum slurry that captured SO2 and mercury from their air emissions).

I was talking to John King (the PSNH, and other facility permit writer at EPA) today and talked to him about PSNH. He says he does want PSNH to update their permit application. John will contact Alan, by phone or letter, and convey the need for more information on their new wastewater stream.

Stergios

5/14/2008



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



Thomas S. Burack, Commissioner

Pre-Application Meeting

**Proposed Merrimack Station Scrubber Project**

By

**Public Service of New Hampshire**

Convened at  
 The Offices of the  
 New Hampshire Department of Environmental Services  
 Conference Rooms 112-113  
 29 Hazen Drive  
 Concord, NH 03302-0095

May 12, 2008  
 11:00 AM

**ATTENDANCE**

Name	Affiliation	Telephone No.	Email
Jeffrey G. Andrews	NHDES	271-6637	jjandrews@des.state.nh.us
JEFFREY G. ANDREWS	"	271-2984	jgandrew@des.nh.gov
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			Over, please



# **Clean Air Project**

**Merrimack Station**

**May 12, 2008 - 11AM**

**DES Presentation**



**Public Service  
of New Hampshire**

**The Northeast Utilities System**

# The Importance of Merrimack Station



Clean Air Project  
Merrimack Station

- Largest and lowest cost baseload station
- Generates 40% of PSNH's power - for 190,000 PSNH customers
- PSNH has the lowest energy price in New England
- MK has a long history of progressive environmental actions to reduce emissions
- Removing mercury is a large technical challenge
- Much work has been done and is on-going to remove mercury early
- Future issues - NPDES Permit Renewal and 316 a/b

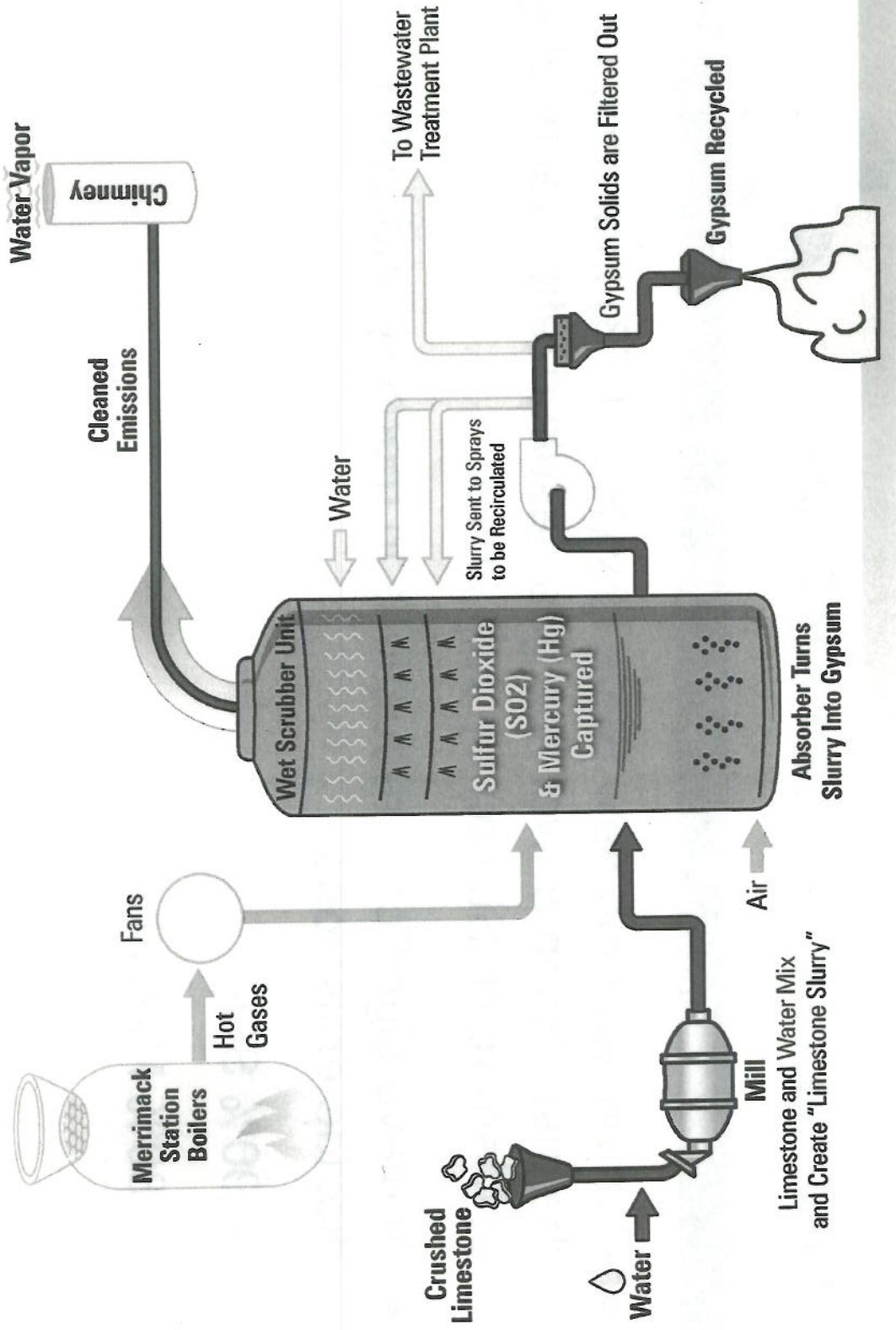
## Purpose of the Clean Air Project



Clean Air Project  
Merrimack Station

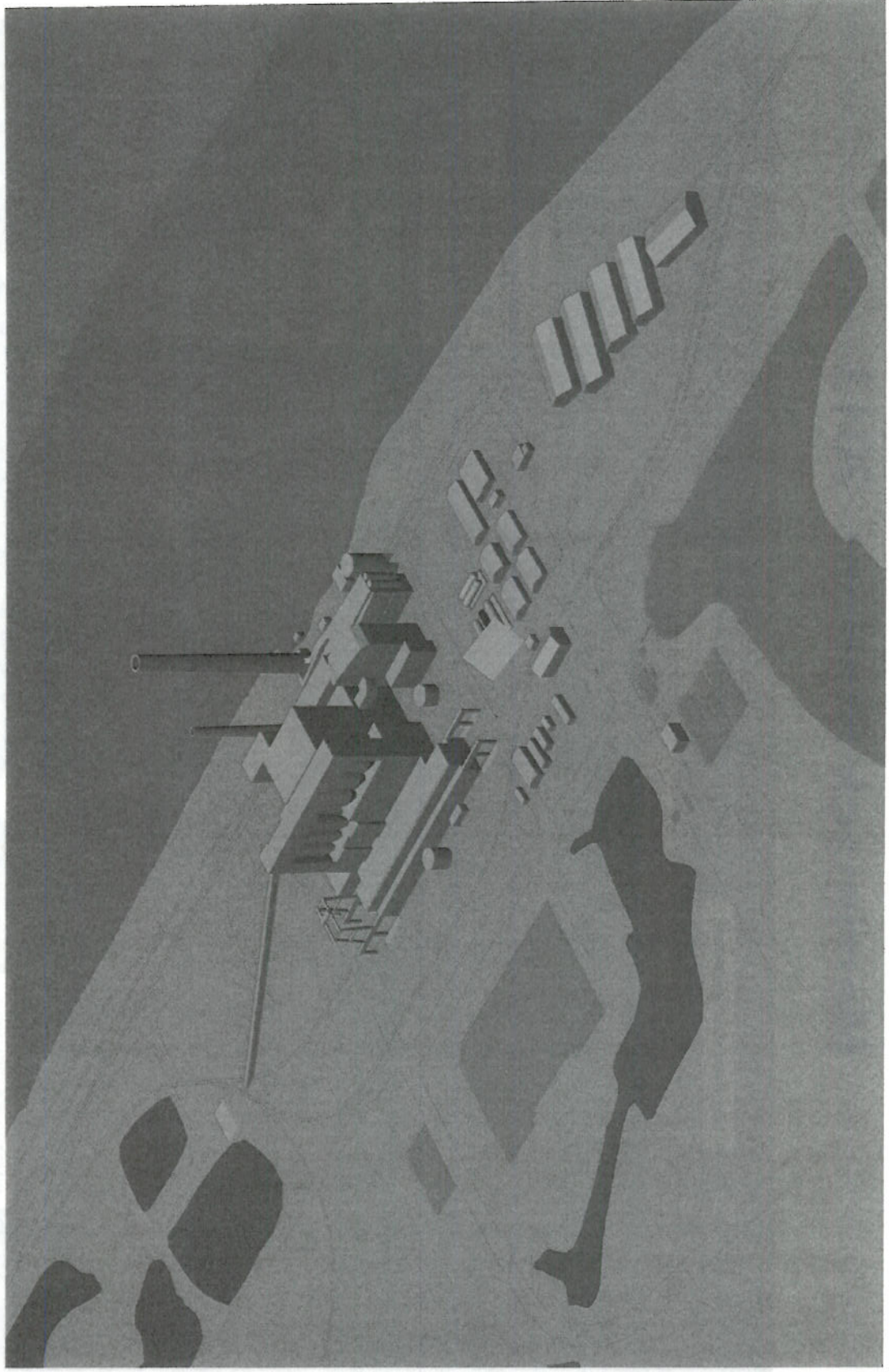
- Comply with the new State law (HB 1673) that requires the installation of wet flue gas desulfurization technology at Merrimack Station by July 2013
- Achieve significant reductions in mercury and sulfur dioxide emissions
  - 90% SO<sub>2</sub>
  - 80% Mercury

# Wet Flue Gas Desulfurization Technology

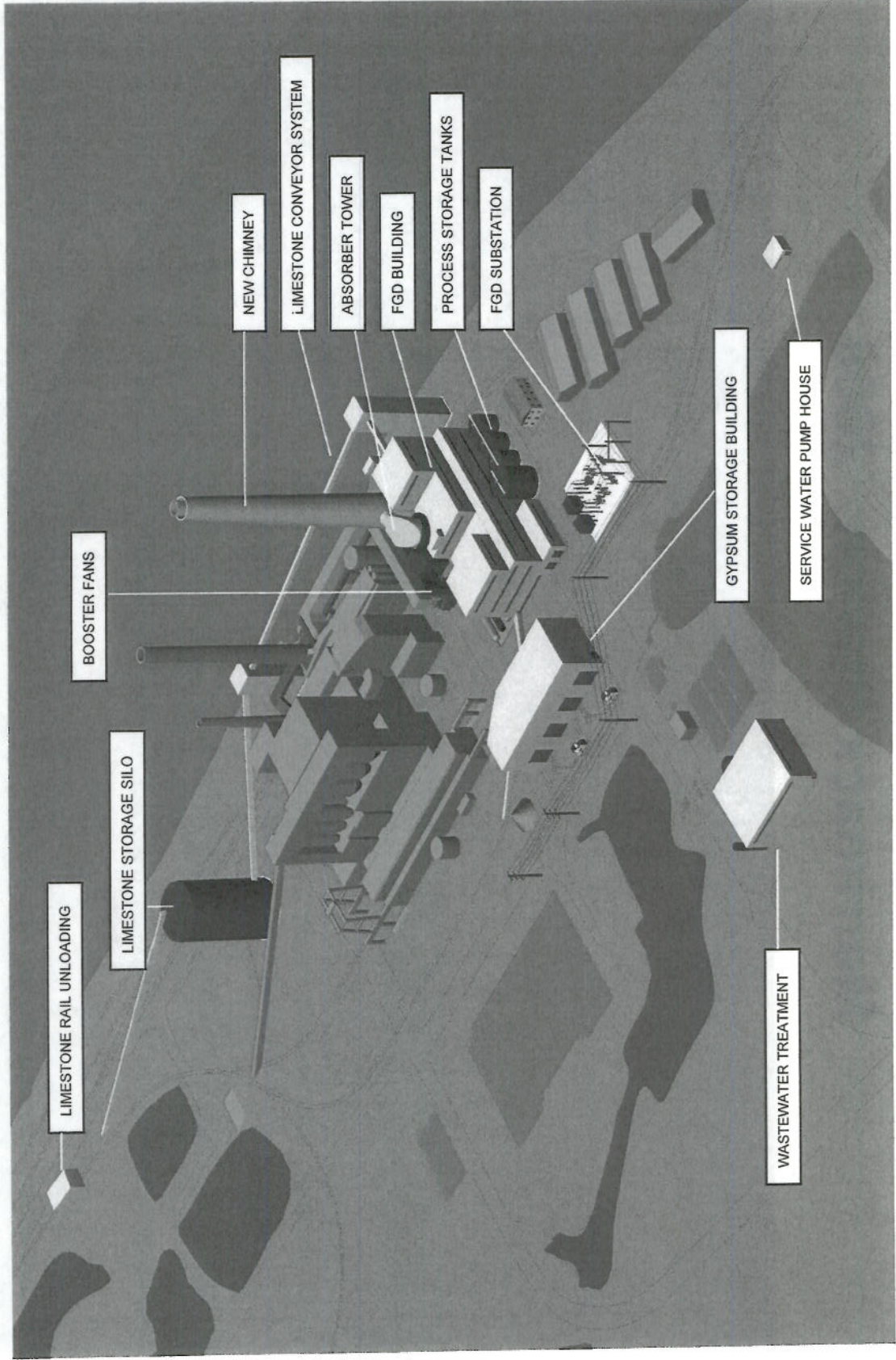




# Merrimack Station: 2008



# Merrimack Station: 2013



# Project Schedule



Project	2006	2007	2008	2009	2010	2011	2012	2013
HB 1673	▲							
Preliminary Engineering	■■■■	■■■■						
Program Manager Hired		▲						
Detailed Engineering		■■■■	■■■■	■■■■				
Major Contracts Awarded			■■■					
Permitting		■■■■	■■■■	■■■■	■■■■	■■■■	■■■■	■■■■
Preliminary Site Prep.			■■■					
Major Construction				■■■■	■■■■	■■■■	■■■■	
Testing & Commissioning							■■■■	■■■■
In Service								▲

# Air Permit



**Clean Air Project**  
Merrimack Station

- Completed to Date:
  - June 6, 2007 - Application for Temporary Permit submitted
  - August 6, 2007 - Incompleteness Determination issued by ARD
  - September 4, 2007 - additional information submitted
  - February 29, 2008 - Modeling Protocol submitted
  - March 21, 2008 - Response to Protocol issued by ARD
- Upcoming:
  - May 2008 - Addendum to Protocol; submit modeling
  - June/July 2008 - preparation of draft permit; public notice
  - August 2008 - public hearing
  - October 2008 - permit issuance

# Water Permits



- Completed to Date:
  - March 10, 2008 - met with Site Specific to discuss strategy
  - April 17, 2008 - received letter from NHB regarding rare species and exemplary natural communities
- Upcoming:
  - Mid-May 2008 - letter to resource agencies regarding NHB findings; meet with Wetlands to discuss strategy
  - June 15, 2008 - Site Specific Permit Application; Wetlands Application; meet with Shoreland to discuss requirements
  - July 15, 2008 - Shoreland Application
  - Fall 2008 - Stormwater NOI; NPDES Permit for WWTP addition; 401 Certification
  - 2009 - River Water Withdrawal Registration

