

{In Archive} Fw: Merrimack Station Scrubber WTP Meeting
Mark Stein to: Sharon Zaya

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[Text of internal EPA email redacted.]

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----- Forwarded by Mark Stein/R1/USEPA/US on 05/18/2009 02:25 PM -----

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05/18/2009 11:29 AM

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Subj Merrimack Station Scrubber WTP Meeting
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On Friday I attended a meeting at NHDES where PSNH presented initial plans for the stack gas scrubber waste treatment plant (WTP). The scrubber and its associated WTP are due to go into service in 2011/12. PSNH also provided a list of the pollutants that potentially will be components of the scrubber's waste treatment plant effluent.

NHDES explained to PSNH that the State of New Hampshire, based on anti-degradation statutes, could not allow Merrimack Station's scrubber WTP to discharge any pollutant that presently causes impairment of the Merrimack River. NHDES also requested PSNH to provide sampling results of Merrimack Station's Outfall 003 and of the Merrimack River. These samplings would provide the data NHDES needs to make an anti-degradation decision for the WTP. If any of the WTP pollutant components take up more than 20% of the Merrimack River's remaining assimilative capacity for that pollutant, then PSNH would need to undertake an extensive anti-degradation study as delineated in NH Env-Wq 1708. NHDES also stated PSNH had to update their NPDES application to include the scrubber WTP effluent.

PSNH was not pleased with NHDES requirements. PSNH felt they were performing a service for the environment by building the scrubber. They were also perplex why, based on the greater good, the scrubber WTP would not be allowed to discharge a few pounds more per year of a particular pollutant. Finally, PSNH is concerned that even though the WTP effluent would have a non-detect for, as an example, mercury, PSNH could still decide it was present in the scrubber WTP effluent. This means, because the Hooksett Pool is in nonattainment for mercury (from atmospheric sources), NHDES would not certify the scrubber WTP effluent as meeting State surface water quality standards.

NHDES was not enthusiastic to PSNH proposal to lower effluent loading through lower outfall maximum flows.

I stated to NHDES and PSNH that EPA intends to place Merrimack Station's Determination Document, Fact Sheet and Draft Permit on Public notice by September 30, 2009. That EPA was not going to wait for NHDES anti-degradation decision. At some point in the future, when the scrubber WTP effluent components had been quantified, a Statement of Basis that developed effluent limits for the scrubber WTP effluent would be developed and placed on public notice.

John