

Re: Legal Question Concerning FGD Zero-Discharge Equipment vs FGD WWTS  
Technology Limits  
John King  
to:  
Mark Stein  
06/01/2011 04:30 PM  
[Show Details](#)

I'm working at home tomorrow, in on Friday. Friday or Monday?

JPK

From: Mark Stein/R1/USEPA/US  
To: John King/R1/USEPA/US@EPA  
Date: 06/01/2011 04:00 PM  
Subject: Re: Legal Question Concerning FGD Zero-Discharge Equipment vs FGD  
WWTS Technology Limits

[Text of internal email redacted.]

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From: John King/R1/USEPA/US  
To: Mark Stein/R1/USEPA/US@EPA  
Date: 05/27/2011 03:54 PM  
Subject: Legal Question Concerning FGD Zero-Discharge Equipment vs FGD WWTS  
Technology Limits

Mark,

Allan Palmer stated to me PSNH, even though PSNH has contracted with Burns  
& McDonnell to design a zero-discharge equipment that will be added to the  
FGD WWTS, the company still wants technology limits for the FGD WWTS.

If zero-discharge is considered the BAT, then can PSNH also have  
technology limits if they wish to by pass the zero-discharge equipment?

PSNH wants to come in and discuss. I said wait until I get back to you.

Thank you, John

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Allan Palmer has informed me that PSNH will be updating the FGD WWTS portion of their NPDES reapplication. Over the last year FGD vessels similar to the one installed at Merrimack Station have experienced corrosion. It appears if any "ordinary" steel, i.e., say tool steel, comes in contact with the exotic steel used to manufacture these non-corrosive FGD vessels, it causes a blemish that the chlorides found in the stack gases bind to and cause the vessel to corrode. In order to prevent this corrosion the number of blow-downs of the FGD vessel have been increased. This will increase the volume of FGD effluent at Merrimack Station from the 50,000 GPD to 94,000 GPD.

Allan Palmer also informs me that PSNH has contracted with Burns & McDonnell to design a zero-discharge system for Merrimack Station's FGD WWTS. The equipment will be similar to what is installed at the Iatan Electrical Generating plant in Iatan, MO operated by Kansas City Power & Light. The manufacturer of the zero-discharge is Aquatech. Palmer also stated PSNH still wants a effluent limits for the FGD WWTS.

John