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Re: Proposed NPDES permit for Merrimack Station
smaguwh
to:
Stephen Perkins
01/02/2011 09:23 PM
Cc:
"Stewart, Harry", David Webster
Hide Details
From: smaguwh@nu.com

To: Stephen Perkins/R1/USEPA/US@EPA

Cc: "Stewart, Harry" <Harry.Stewart@des.nh.gov>, David Webster/R1/USEPA/US@EPA

Stephen,

Thank you for your message providing us with an update on EPA's plans regarding the upcoming renewal NPDES Permit for Merrimack Station.

We understand that this overall process is very detailed and requires much effort by many.

PSNH has given much thought to your plans and the timing related to the upcoming public process. While there are many issues that may be debated, the topics such as fish protection, thermal discharge, among others will each assuredly cause much exchange from interested groups. The technical data we have submitted to you highlights the science and biological details necessary for proper consideration. While we believe we have presented the necessary information to form a clear basis of our opinions, we also continue to believe that the comments and involvement by many other groups on various issues will cause this overall permit process to become contentious and protracted.

The proposed NPDES permit process and expected lengthened schedule before finalization will, in our opinion, not support our need to allow for use of a new, small discharge from our new Wet Flue Gas Desulfurization (WFGD) system expected to come on line for testing in mid 2011. This small discharge stream, associated with the new WFGD, will have acceptable discharge limits based on the strict and rigorous NH DES standards applied. The environmental benefit that this Project will provide to improve air emissions is an exceptional environmental benefit and getting it on line sooner rather than later should be a priority for us all.

As we and our NH DES personnel have indicated, we would like to seek a way to allow this liquid discharge to be allowed within the strict State technical requirements developed and not have it slowed by a NPDES permit process which will take, I fear, years to become finalized. This largest environmental project even built in New Hampshire should be allowed on line early, as NH legislation desired, and we wish to could join with you to seek a positive environmental outcome for New Hampshire as soon as possible. We also are concerned about the unnecessary added cost to our customers, should this project become delayed.

I will be in contact with your this coming week to further our discussion on this urgent issue. Thank you for your

continued dialogue and we look forward to a further open exchange of ideas. Thanks

Happy New Year

From: Perkins.Stephen@epamail.epa.gov
To: William H. Smagula/NUS@NU
Cc: "Stewart, Harry" <Harry.Stewart@des.nh.gov>, Webster.David@epamail.epa.gov
Date: 12/28/2010 02:23 PM
Subject: Proposed NPDES permit for Merrimack Station

hi bill,
i suspect you won't be surprised to learn that EPA will not be able to make the end of December target I had announced to everyone. i do have a growing group of people working on it, particularly on the information you supplied in the two letters earlier this month. we have not finished our work and we do need to give our colleagues at NH DES the opportunity to give us feedback on our work before we take it public. my new target is to get a draft out to public comment by the middle of February.
i understand PSNH's strong interest as regards the FGD system. i think you understand my equally strong desire to give the public a chance to comment with full view of all the parameters of a proposed new permit. i will let you know if there is any significant change in this forecast.
with best wishes for the new year,
stephen

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