

8 Nov 2010

MERRIMACK SYSTEM FGD UNITS
EPA / NHDES / PSNH

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Bill Smagula

Legal obligations for FGD System - 2013 deadline w/ incentives
- Need Mod of NPDES to discharge

- ① Worked w/ Manufacturers foreign.
 - Meeting ② State regulation
 - ③ EPA
- Budget Earm. Project in NH.

2012 - State Law

SO₂; CO₂ (Roggin); H₂S;
2006 Law - 80% mercury reduction

SCR - 1st unit in Canada
ESP - particulates

gypsum - 150,000 tons for recycling
90% of ash is recycled
450 people build it

Major construction underway

Waste Water Treatment Facility
Q4 - Unit 4 - operable w/ scrubber
wants treatment
Want to hot system first

Q2 -
Challenges in each step
- Conia Club
- CLF
→ every challenge has been defeated

DEE
Bob Scott
Mike Walls
Harry Spennel
Jeff
Stergis

EPA
JPK

PSNH
Sharon Elizabeth
Jeff Tillison? - PSNH
Alan Palmer
Richard Roy

PSNH
- Beby - Kray
John McDonald
Bury Low
Bills

EPA
- Link Leach -
- Edie Gold
- Mark Sh

Barry Medlam
John MacDonald PSNH

NADES
Tah Buref
No

Challenges - on well -
- respect rights
- due process
Stopping it for results
of stopping it.

4 Pollutant Bill.

CO₂, Mercury, SO_x, NO_x.

"sub permit"

→ expect to have permit for

Mike Walls

- State support PSNH, State looking for process to set

- Let's have bigger picture

Betsy Davis

- not a permit modification

- lots of issue.

- that permit will be appealed.

- EAB is too long. - want legally credible

⇒ ACO, Admin Consent Order - interim state/monitoring

- might need
- beyond point

Bib Scott

- SCR

- become SCR

• 90% of Hg was oxidized → local concerns

• Hot spots in water due to Hg.

• MACT std. ~~to~~ comply + scrubber complies by house

• SO₂ county - Non-attainment - need attainment

→ Also

Betsy - Technology Credibility Test

Recycle the water?

- it concentrates in scrubber liquid - chlorine.

- into boilers → into fly ash.

- 90% recycled byproducts - don't want to risk this

Need dilution of treatment pool for Chlorine

Mercury + Arsenic - added ^{in WSP} metal removal

↓ volume

Monitors critical loading - mass staying

- Copper - Hg
- Al - As

Could this be ~~also~~ a "low volume water stream" metals by flue gas

- Appreciate - Env. Ben.
- NPDES permit for some time.
- details of NPDES

250,000 gpd.
"low volume waste stream"

"Non-waste quality impacts"

"make sense" - Alan.

Stephen Perkins - Options

1) Not Modifying the Permit

2) New permit

Draft by end of year

NH Law doesn't render the CWA moot

Betsy - we are not trying to cut people out of the process

- Not saying only a compliance order

AO where EPA is anticipating an investigation
of compliance

↳ for a pilot program
- that permit limits

Dr: What are the limits? intention or otherwise?

Edie - 40s typically have not been used for new discharges

Let's get project up + running.

~~Permit~~

Is it fair to hold up the scribbles for one group?

- Public Process will occur when the NPDES process kicks in

NH Siting Council - In the public interest?

- Not a major change in the plant.

This is what we know - now.

Incentive - Merit credits - marketable or to use in the interest
- Not cap + trade -

Haze Law will make it a requirement, even absent
the State Air Law.

Styke - Important to get a permit ~~about~~ the street
- EPA transparent.
- get a proposal
- to see if there is a path

Linder - Independent Permit w/ contractor as permittee
- possible merge in the long term

Workshops

- 308 response → BAT
- ~~AOC~~ How could AOC work
- Engineering options for the interim.
- Keep multiple paths open

S.P.
We get it: the
Air/Water transfer.

CHAPTER 105

HB 1673-FN – FINAL VERSION

22Mar2006... 0936h

2006 SESSION

06-2816

06/03

HOUSE BILL *1673-FN*

ACT relative to the reduction of mercury emissions.

SPONSORS: Rep. Ross, Hills 3; Rep. Slocum, Hills 6; Rep. Kaen, Straff 7; Rep. Phinizy, Sull 5; Rep. Maxfield, Merr 6; Sen. Green, Dist 6; Sen. Johnson, Dist 2; Sen. Burling, Dist 5; Sen. Odell, Dist 8; Sen. Hassan, Dist 23

COMMITTEE: Science, Technology and Energy

ANALYSIS

This bill provides for an 80 percent reduction of mercury emissions from coal-burning power plants by requiring the installation of scrubber technology no later than July 1, 2013 and provides economic incentives for earlier installation and greater reductions in emissions.

125-O:13 Compliance.

I. The owner shall install and have operational scrubber technology to control mercury emissions at Merrimack Units 1 and 2 no later than July 1, 2013. The achievement of this requirement is contingent upon obtaining all necessary permits and approvals from federal, state, and local regulatory agencies and bodies; however, all such regulatory agencies and bodies are encouraged to give due consideration to the general court's finding that the installation and operation of scrubber technology at Merrimack Station is in the public interest. The owner shall make appropriate initial filings with the department and the public utilities commission, if applicable, within one year of the effective date of this section, and with any other applicable regulatory agency or body in a timely manner.