



October 10, 2011  
RTC11-006

Mr. David Webster, Chief  
Office of Ecosystem Protection  
United States Environmental Protection Agency ("EPA")  
NPDES Industrial Permit Branch (CIP)  
5 Post Office Square - Suite 100, OEP06-1  
Boston, MA 02109-3912

Subject: Extension Request to Provide Comments on the Draft National Pollutant Discharge Elimination System (NPDES) Permit for Merrimack Station

Mr. Webster:

Enercon Services, Inc. (ENERCON) was recently made aware that a draft NPDES permit for Merrimack Station had been issued for public comment. Given our involvement with PSNH's "Response to United States Environmental Protection Agency CWA § 308 LETTER" (November 2007) and the "Supplemental Alternative Evaluation" (October 2009), both for Merrimack Station, we are intently interested in reviewing and commenting on the draft permit. It is our understanding that all comments on the draft permit are to be submitted before November 30<sup>th</sup>, 2011. Based on the volume of material to review and the availability of personnel involved with our previous efforts at Merrimack Station, we do not believe we can adequately review and comment on the draft permit before this deadline.

ENERCON has been involved in efforts at PSNH spanning back to 2007, and has maintained core personnel experienced on this project throughout each phase, including Sam Beaver (with over 37 years of experience in the power industry). Sam Beaver is currently an expert witness in Indian Point Energy Center's proceedings with the New York State Department of Environmental Conservation, testifying on the availability of cylindrical wedgewire screens at the site. We believe it is necessary to have Sam Beaver involved in the review and comment on the draft permit, and as such we request the comment period be extended by ninety (90) additional days.

We appreciate your consideration of our extension request and are available to discuss should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Richard Clubb".

Richard Clubb, P.E.  
ENERCON Project Manager  
Office: (678) 797-5035

cc: Linda Landis, PSNH Senior Counsel  
Robert Fowler, External Counsel (Balch & Bingham LLP)  
Allan Palmer, PSNH Senior Engineer