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October 21, 2011

**Via e-Mail ([webster.david@epa.gov](mailto:webster.david@epa.gov)) and Overnight Mail**

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

Re: Public Service Company of New Hampshire  
Merrimack Station, Bow, New Hampshire  
Draft NPDES Permit No. NH0001465

Dear Mr. Webster:

Southern Company, based in Atlanta, has nearly 43,000 megawatts of electricity generating capacity and provides power to about 4.7 percent of the U.S. electricity market. Much of this power is generated using coal. We are aware that EPA Region 1 has published a draft NPDES permit for Public Service Company of New Hampshire's Merrimack Station in Bow, New Hampshire, another coal-fired facility. Comments are due November 30, 2011, which is little time for a permit as complex as the proposed Merrimack permit. By letter of October 11, 2011, the permittee asked that the comment deadline be extended 90 days.

Southern Company supports the permittee's request for extension. Normandeau Associates, NERA Economic Consulting, and Enercon have all indicated that they need additional time to review the large volume of material in the record. Southern Company agrees that more time should be allowed. The permit limits in the draft permit, especially for flue gas desulfurization waste water, are based on a complicated statistical analysis by EPA headquarters based on data from just two power plants, Belews Creek and Allen. It is important to other power companies, and to the industry as a whole, that these data be thoroughly analyzed. Since the basic analysis was done by EPA headquarters in Washington, D.C., and since the analysis is based not on the permitted plant but on two different plants that EPA headquarters must regard as models, there is every reason to believe that EPA's analysis for Merrimack will influence the proposed rule to revise the national effluent limitations guidelines for the steam electric industry, which is scheduled to be decided by EPA this coming July. The fact that several of the proposed permit terms reverse past EPA permitting decisions for Merrimack is all the more reason to allow time for careful consideration.

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On a matter of such importance to all coal-burning power companies, Region 1 should not rush the technical and economic experts who are reviewing the data. For that reason, Southern Company asks that Region 1 extend the comment deadline by 90 days.

Sincerely,



Chris M. Hobson