

**Responses to Comments**  
**Public Review of Merrimack Station**  
**NPDES Permit No. NH0001465**



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## **Disclaimer**

This document contains summarized and verbatim comments received by the U.S. Environmental Protection Agency (EPA) during three public comment periods for the Merrimack Station power plant located in Bow, New Hampshire: 1) public comment period for a Draft Permit, 2) public comment period for a Revised Draft Permit, and 3) a public comment period for EPA's Statement of Substantial New Questions for Public Comment. See Chapter I below for summary of public comment periods. Some of EPA's responses reflect changes made to the Final Permit issued in tandem with this document. It is important to note that the responses in this document might differ slightly from the language in the Final Permit. The permit language, however, has precedence and is legally binding on Merrimack Station.

# Preface

The U.S. Environmental Protection Agency’s New England Region (Region 1, EPA, the Agency) is issuing a Final National Pollutant Discharge Elimination System (NPDES) Permit for the Merrimack Station power plant in Bow, New Hampshire, effective September 1, 2020. This document presents the Region 1’s responses to the comments received during three public comment periods and for two Draft Permits (No. NH0001465) issued for Merrimack Station. The individual responses explain and support the Region 1’s determinations that form the basis of the Final Permit. The comments and the Region’s corresponding responses are organized under eight major subject areas or chapters, as shown in the Table of Contents. Preceding each individual comment/response is the administrative record number and the individual commenter to which it correlates, and page number(s) in the document where the comment is found, as shown in the following example:

<b>Comment VIII.2.5</b>	<b>AR-1231, PSNH, p. 20</b>
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The Responses to Comments document is available on EPA’s website at <https://www.epa.gov/npdes-permits/merrimack-station-draft-npdes-permit>. Documents found in the administrative record are available on EPA’s website at <https://www.epa.gov/npdes-permits/merrimack-station-administrative-record> or upon request to EPA; please contact Sharon DeMeo at 617-918-1995 or email at [demeo.sharon@epa.gov](mailto:demeo.sharon@epa.gov).

EPA received additional comments after the close of the public comment period. Although the comments received were similar to those received during the public comment period, and therefore do not raise substantial new questions warranting that the Region exercise its discretion to reopen the public comment period under 40 CFR § 124.14(b), EPA chose to incorporate these comments within the document.

## Acronyms, Abbreviations, and Symbols (Selective List)

AEI	adverse environmental impact
AIF	actual intake flow
APA	Administrative Procedure Act
AR	administrative record
BAT	best available technology
BATW	bottom ash transport water
BCA	benefit cost analysis
BCT	best conventional pollutant control technology
BIP	balanced indigenous population
BOD	biological oxygen demand
BPJ	best professional judgment
BPT	best practical control technology currently available
BTA	best technology available
CAA	Clean Air Act
CCC	closed cycle cooling
CFR	Code of Federal Regulations
cfs	cubic feet per second
CLF	Conservation Law Foundation
CRL	combustion residual leachate
CWA	Clean Water Act
CWF	combined waste stream formula
CWIS	cooling water intake structure
CWWS	cylindrical wedgewire screens
DIF	design intake flow
DMR	discharge monitoring report
DO	dissolved oxygen
EAB	Environmental Appeals Board
EFH	essential fish habitat
ELG	Effluent Limitations Guidelines
EMARS	enhanced mercury and arsenic removal system
EPA	Environmental Protection Agency
EPRI	Electric Power Research Institute
FAC	free available chlorine
FGD	flue gas desulfurization
fps	feet per second
gpm	gallons per minute
GSP	Granite Shore Power (current owner of Merrimack Station)
GZA	GeoEnvironmental, Inc.
ISO	independent system operator

LMRLAC	Lower Merrimack River Local Advisory Committee
LVW	low volume wastewater
MAF	mean annual flow
MCW	metal cleaning wastes
MDL	maximum daily load
MGD	million gallons per day
mg/L	milligrams per liter
MK-1 and MK-2	Units 1 and 2 at Merrimack Station
ML	minimum level
MW	megawatt
NCMCW	nonchemical metal cleaning waste
NELG	National Effluent Limitations Guidelines
NERA	National Economic Research Associates
NHDES	New Hampshire Department of Environmental Services
NPDES	National Pollutant Discharge Elimination System
NSPS	new source performance standards
O&G	oil and grease
PAR	Pan Am Railways
PCB	polychlorinated biphenyl compounds
POC	pollutants of concern
POTW	publicly owned treatment works
PSES	pretreatment standards for existing sources
PSNH	Public Service Company of New Hampshire (former owner of Merrimack Station)
PSNS	pretreatment standards for new sources
PWWTS	public wastewater treatment system
PYSL	post yolk sac larvae
RCRA	Resource Conservation and Recovery Act
RIS	resident indigenous species
RTC	response(s) to comments
RTO	regional transmission organization
SBA	Small Business Administration Office of Advocacy
SFC	submerged flight conveyor
SIU	significant industrial users
T&E	threatened and endangered species
TDD	Technical Document Development
TDS	total dissolved solids
TMDL	total maximum daily load
TRC	total residual chlorine
TRO	total residual oxidants
TSS	total suspended solids
USGS	United States Geological Survey
UWAG	Utility Water Action Group
VCE	vapor compression evaporation

WET	whole effluent toxicity
WQBEL	water quality-based effluent limits
WQS	water quality standards
WTP	willingness to pay
WTP	waste treatment plant
WWTF	wastewater treatment facility
WWTS	wastewater treatment system
§, §§	section, sections
°C	degrees Celsius (as in 25 °C; note spacing)
°F	degrees Fahrenheit
µg/l	micrograms per liter
7Q10	the lowest 7-day average river flow that occurs once every ten years