GSP MERRIMACK

431 River Road
Bow, NH 03304

January 14, 2020

Submitted on-line via NetDMR

U.S. Environmental Protection Agency
Water Technical Unit (SMR-04)
OES4 – SMR
5 Post Office Square - Suite 100
Boston, MA 02109-3912

Reference: NPDES Permit No. NH0001465, Merrimack Station, GSP Merrimack LLC, issued June 25, 1992, modified October 22, 1992, modified January 10, 2018.

Dear Sir/Madam:

Merrimack Station
Monthly NPDES Discharge Monitoring Report
December 2019

In compliance with Part I, Section B.1., of the NPDES permit (see Reference), Granite Shore Power LLC (GSP) herein submits the monthly NPDES report for Merrimack Station for the month of December. Except for Outfall 003A, all sampling and analyses were conducted by station personnel in accordance with EPA approved procedures referenced at 40 CFR Part 136. Eastern Analytical, Inc. of Concord, NH, performed the iron, copper, oil and grease, and total suspended solids analyses on the samples collected at Outfall 003A. There were no oily sheens, floating solids, or foam observed in any of the outfall discharges in other than trace amounts. There were no permit noncompliances recorded during the month.

As instructed by the agencies, GSP now reports a concentration of zero ("0") when the analytical result is less than the method detection limit (MDL). For this report, the following MDLs were used: Total Residual Oxidants = 0.01 mg/l (SM 4500-Cl D – 2011); Total Residual Oxidants = 0.05 mg/l (SM 4500-Cl E – 2011); Oil & Grease = 5.0 mg/l (EPA 1664B); Total Suspended Solids = 5.0 mg/l (SM 2540D – 2011).

The pH at Outfall 003 (Station S-0) routinely dropped below 6.5 SU during the first half of December. Compliance was maintained with the permit however, as the effluent pH closely tracked the naturally occurring river pH at Station N-5 (see the attached data sheets), and any discrepancies were within the analytical limits of the equipment accuracy and precision. As such, these low pH values were not the result of activities at Merrimack Station and should not be recorded as violations in the Integrated Compliance Information System, Enforcement and Compliance History Online, or any other EPA compliance database.

As is typically reported in each December DMR, the minimum pH recorded at Outfall 004 was below the permit limit of 6.5 SU due to the discharge from the Unit 2 screenhouse roof drain. In 2019, a roof drain sample was collected and measured on May 28 which yielded a pH concentration of 5.9 SU. A sample of rainwater collected on the same day also measured 5.9 SU. Clearly the low pH of the outfall is due solely to naturally occurring conditions and is not a result of activities at Merrimack Station. Beyond this roof drain sample, the next lowest pH measurement collected at Outfall 004 during the year was 6.7 SU. As such, compliance was maintained since the single low reading was the result of naturally occurring conditions and this event should not be recorded as a violation in the Integrated Compliance Information System, Enforcement and Compliance History Online, or any other EPA compliance database.

This report is required by, and prepared specifically for, the U.S. Environmental Protection Agency (EPA). It presents truly, accurately and completely, the observed measurements and analyses required by the EPA to be performed or submitted, but only such observed results. It is not intended as an assertion of the accuracy of any instrument, reading, or analytical result, nor is it an endorsement of the suitability of any analytical or measurement procedure.

If you have any questions regarding this report, please call Allan Palmer, Senior Engineer, at (603) 230-7951.

Sincerely,

GRANITE SHORE POWER

Elizabeth H. Tillotson

Elizabeth H. Tillotson
Executive Director of Administration & Regulatory Affairs

Enclosures

GSP MERRIMACK LLC
MERRIMACK GENERATING STATION
ENVIRONMENTAL MONITORING PROGRAM

MONTHLY SUMMARY REPORT FOR December 2019

STATION: N5 PARAMETER: PH

DAY	MAXIMUM (PARAM)	TIME	DAILY AVERAGE	MINIMUM (PARAM)	TIME	#of INT.
12/01/19	6.73	0330	6.69	6.63	1900	96
12/02/19	6.72	0645	6.70	6.68	1415	96
12/03/19	6.74	0630	6.71	6.69	1745	96
12/04/19	6.75	0630	6.73	6.70	1445	96
12/05/19	6.75	1845	6.73	6.70	0115	96
12/06/19	6.76	0545	6.75	6.73	0230	96
12/07/19	6.77	0915	6.75	6.71	2215	96
12/08/19	6.76	0730	6.74	6.71	2215	96
12/09/19	6.76	1045	6.73	6.71	2215	96
12/10/19	6.76	0945	6.73	6.68	2030	96
12/11/19	6.80	1430	6.77	6.74	0115	96
12/12/19	6.81	0945	6.77	6.74	2330	96
12/13/19	6.78	0345	6.73	6.69	1900	96
12/14/19	6.73	0845	6.68	6.63	1815	96
12/15/19	6.71	0730	6.67	6.63	2015	96
12/16/19	6.67	0215	6.63	6.57	2145	96
12/17/19	6.60	1200	6.54	6.45	1400	96
12/18/19	6.56	2300	6.52	6.48	0545	96
12/19/19	6.65	2330	6.57	6.48	0945	96
12/20/19	6.65	0015	6.61	6.60	0630	96
12/21/19	6.66	0930	6.63	6.61	0015	96
12/22/19	6.68	1730	6.65	6.61	0615	96
12/23/19	6.73	0830	6.65	6.46	0945	96
12/24/19	6.82	2330	6.67	6.65	0830	96
12/25/19	6.83	0145	6.78	6.75	1415	96
12/26/19	6.79	1545	6.77	6.76	0030	96
12/27/19	6.79	1900	6.78	6.75	2215	96
12/28/19	6.80	1400	6.79	6.76	0615	96
12/29/19	6.82	1930	6.80	6.78	0030	96
12/30/19	6.82	2230	6.81	6.80	0130	96
12/31/19	6.83	1000	6.81	6.80	1315	96
AVERAGE	6.74		6.71	6.67		
STD DEV.:	0.07		0.08	0.10		

GSP MERRIMACK LLC

MERRIMACK GENERATING STATION

ENVIRONMENTAL MONITORING PROGRAM

MONTHLY SUMMARY REPORT FOR December 2019

STATION: Zero PARAMETER: PH

DAY	MAXIMUM (PARAM)	TIME	DAILY AVERAGE	MINIMUM (PARAM)	TIME	#of INT.
12/01/19	6.53	0445	6.51	6.49	0000	96
12/02/19	6.48	0030	6.45	6.42	1815	96
12/03/19	6.46	0800	6.44	6.41	1215	96
12/04/19	6.45	0945	6.42	6.38	1445	96
12/05/19	6.44	2230	6.42	6.41	0430	96
12/06/19	6.45	1530	6.44	6.42	2245	96
12/07/19	6.43	0030	6.42	6.40	0400	96
12/08/19	6.44	1215	6.41	6.40	1845	96
12/09/19	6.42	1445	6.39	6.33	0730	96
12/10/19	6.48	2345	6.42	6.38	0200	96
12/11/19	6.52	1215	6.49	6.44	0000	96
12/12/19	6.47	0600	6.43	6.41	2245	96
12/13/19	6.71	1845	6.47	6.33	1345	96
12/14/19	6.71	0100	6.69	6.66	0815	96
12/15/19	6.73	0415	6.66	6.59	0000	96
12/16/19	6.62	0400	6.56	6.51	2230	96
12/17/19	6.66	2230	6.57	6.51	1230	96
12/18/19	6.66	1700	6.60	6.50	0645	96
12/19/19	6.72	1215	6.65	6.59	0430	96
12/20/19	6.70	1500	6.67	6.63	0215	96
12/21/19	6.71	0900	6.69	6.67	0415	96
12/22/19	6.75	1830	6.72	6.69	0115	96
12/23/19	6.75	0915	6.71	6.67	2245	96
12/24/19	6.77	0745	6.74	6.67	0100	96
12/25/19	6.79	1830	6.78	6.75	0015	96
12/26/19	6.78	0715	6.77	6.75	1330	96
12/27/19	6.78	1145	6.77	6.76	0545	96
12/28/19	6.80	1630	6.78	6.76	1015	96
12/29/19	6.81	1915	6.79	6.77	0600	96
12/30/19	6.80	1130	6.78	6.76	1900	96
12/31/19	6.78	0015	6.76	6.75	2345	96
AVERAGE	6.63		6.59	6.55		
STD DEV.:	0.14		0.15	0.15		