ELECTRIC POWER RESEARCH INSTITUTE

December 18, 2017

Ms. Sharon DeMeo
U.S. Environmental Protection Agency – Region 1
Office of Ecosystem Protection, Industrial Permits Branch
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Subject: The Electric Power Research Institutes (EPRI) Technical Comments in Response to *Substantial New Questions and Possible New Conditions for the Merrimack Station Draft NPDES Permit that are Now Subject to Public Comment During the Comment Period Reopened by EPA under 40 C.F.R. § 124.14(b))*

Dear Ms. DeMeo:

EPRI appreciates the opportunity to provide comments to the U.S. Environmental Protection Agency Region 1 in response to the subject as requested by The New Hampshire Department of Environmental Services (NHDES) and the United States Environmental Protection Agency (EPA or the Agency) in Public Notice NH-008-17 dated August 2, 2017. The attached comments (and supporting references not currently in the Administrative Record) focus on two areas and three subjects:

- New Information Raising Substantial New Questions Pertaining to Permit Requirements for Cooling Water Intake Structures Under Clean Water Act (CWA) § 316(b) [specifically on wedge wire screens for fish protection];
- New Information Raising Substantial New Questions Regarding the Application of CWA § 316(a) and New Hampshire Water Quality Standards for Setting NPDES Permit Requirements for Merrimack Station's Thermal Discharges
    - New information concerning Merrimack Station's waste heat discharges and their effects on Merrimack River water temperatures; and
    - New information concerning the presence of the Asian clam, an invasive freshwater mollusk, in the Merrimack River in the vicinity of Merrimack Station

Please also note that EPRI is also separately submitting comments on EPA's draft determination of technology-based effluent limits for flue gas desulfurization (FGD) and bottom ash wastewater at Merrimack Station. Those comments will be submitted by my colleague Paul Chu.

If you have any questions on our comments, please contact me at ddixon@epri.com or 607-869-1025.

Happy Holidays,

Douglas A. Dixon, PhD
Technical Executive & Program Manager
Fish Protection Research

c: Jon Black, EPRI
Jessica Fox, EPRI

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