

Merrimack NPDES Permit—Open Items

Capacity Factor for Summer Alternative Compliance with Chronic Temp Limit:

45% CF / 45-day rolling average / May-Sept. / If highest 45-day average CF in a month is at or below 45%, then weekly average temp limits do not apply that month / two options for May (permit would only include one of them):

- a. May uses 31-day rolling average; or
- b. use last two weeks of April to calculate a 45-day average at end of May

Summer Acute Temperature Limit: May-July only / Daily maximum / 30.9°C^1 / Measured as hourly average at S-4 / If the measured hourly average temperature at S-4 is above 30.9°C , the permittee remains in compliance with this effluent limitation so long as it, as soon as possible but within a period no longer than six hours following the hour in which S-4 measured above 30.9°C , reduces the thermal output of the discharge either: to the extent that the measured hourly average temperature does not exceed 30.9°C as an hourly average, or to the minimum safe operating load for the units.²

Delta-T: Because ambient temperatures in the river may at times approach or exceed the chronic and/or acute levels identified in the permit, the permit should provide that compliance is maintained with both so long as S-4 is no more than 2°C greater than N-10 or N-5 (whichever location is used for ambient temp at the time). The permit should also specify that so long as the Station is not generating, there cannot be non-compliance with thermal limits.

Compliance Schedule for Thermal Limits: Permit must include a minimum 18-month compliance period to install and test monitors (e.g., new winter placement) and before chronic and acute thermal limits become effective (due to need to develop standard operating procedures).

Section 316(b) Compliance: BTA=wedgewire screens / two-stage compliance schedule: 1) period to study screen feasibility and effectiveness and 2) period to select and implement option for achieving similar effectiveness.

¹ EPA calculated value, based on formula from EPA's Quality Criteria for Water (1986) ("Goldbook"), including a buffer of 2°C . See EPA, Appendix D at 190, Item 618 in Merrimack NPDES Permit Administrative Record.

² This language is adapted from the permit for GE's Aviation facility in Lynn, MA.