



431 River Road
Bow, NH 03304

February 28, 2025

VIA EMAIL

Mike Butler
Hauled Waste Coordinator
Lowell Regional Wastewater Utility
The City of Lowell
451 First St Blvd (Rte-110)
Lowell, MA 01850
mbutler@lowellma.gov

Re: Annual Permanent Cessation of Coal Combustion Progress Report for Merrimack Station Units 1 and 2 - Flue Gas Desulfurization Wastewater

Dear Mr. Butler:

In accordance with 40 C.F.R. § 423.19(g) (2024), this constitutes the “Annual Progress Report” of GSP Merrimack LLC (“GSP” or the “Company”) pertaining to Merrimack Station Units 1 and 2. GSP has elected to comply with the relevant portions of 40 C.F.R. Part 423’s flue gas desulfurization (“FGD”) wastewater provisions relating to “unit[s] that will achieve permanent cessation of coal combustion by December 31, 2028”¹ and currently expects Units 1 and 2 to permanently cease coal combustion by June 1, 2028.

Participants in the permanent cessation category are required to submit an Annual Progress Report.² The Annual Progress Report must discuss interim milestones (including whether any have been completed, missed, or delayed) and also must update these milestones, as needed.³ EPA’s 2024 ELG Rule⁴ also added a new provision that requires a participant to include one of the following in Annual Progress Reports:

¹ See, e.g., 40 C.F.R. § 423.19(g) (2024).

² *Id.* § 423.19(g)(3).

³ See *id.* § 423.19(g)(4).

⁴ EPA, Supplemental Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category, 89 Fed. Reg. 40,198 (May 9, 2024) (codified at 40 C.F.R. Part 423).

- A copy of the official suspension filing (or equivalent filing) made to the facility's reliability authority detailing the conversion to a fuel source other than coal;
- A copy of the official retirement filing (or equivalent filing) made to the facility's reliability authority which must include a waiver of rescission rights; or
- An initial certification, or recertification for subsequent annual progress reports, containing a statement that the facility will make one of the above-referenced filings.⁵

Interim Milestones

GSP does not have any interim milestones or other specific events the Company must complete to achieve the permanent cessation of coal combustion of Units 1 and/or 2 at Merrimack Station by June 1, 2028. Further, GSP does not have any updated milestones to disclose at this time.

Initial Certification – Reliability Authority Filing

GSP intends to submit an official suspension filing, retirement filing, or equivalent filing to ISO-New England detailing Units 1 and 2's permanent cessation of coal combustion in accordance with the rules and procedures in place in 2027 or 2028.

* * * * *

If you have questions regarding this Annual Progress Report, please feel free to contact me at (603) 230-7968.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Elizabeth H. Tillotson, Vice President
Granite Shore Power LLC

cc: Allan Palmer, Granite Shore Power LLC

⁵ See 40 C.F.R. § 423.19(g)(4)(i)-(iii) (2024).