

Mr. Allan Palmer
GSP Merrimack LLC
431 River Road
Bow, New Hampshire 03304

August 13, 2021
File No. 2025.12

Re: Periodic Runon and Runoff Control System Plan Update
Merrimack Station Coal Ash Landfill
Bow, New Hampshire

Dear Allan:

Sanborn Head & Associates, Inc. (Sanborn Head) prepared an initial Runoff and Runoff Control System Plan (Plan) for the Merrimack Station Ash Landfill (landfill) in Bow, New Hampshire, dated August 20, 2016. The plan was prepared to comply with the requirements of the Standards for the Disposal of Coal Combustion Residuals (CCR) in Landfills and Surface Impoundments (40 CR Part 257 Subpart D), which became effective on October 19, 2015. The Plan must be updated every 5 years, or by August 20, 2021, as required by 40 CFR Part 257.81(c)(4).

Due to limited operations at the landfill, there are no known changes to facility operations, site features, topography, or drainage patterns at and surrounding the landfill since 2016 that would necessitate the Plan to be updated/modified. The rainfall volume for the 25-year, 24-hour stormwater event (obtained from the Northeast Regional Climate Center extreme precipitation data) has decreased from 5.27 inches, which was used in the initial 2016 Plan, to 5.24 inches. Because it is more conservative to use the higher precipitation estimate from the initial 2016 Plan, Sanborn Head does not recommend adjusting the HydroCAD™ model and evaluation for the lower precipitation estimate.

We believe that the Plan continues to document how the runon and runoff system was designed and constructed to meet the requirements described in 40 CFR Part 257.81(a)(1) and (2) and does not need to be updated at this time. The Plan should be amended whenever there are conditions at the landfill that would substantially affect the Plan and should continue to be reviewed/updated every 5 years, or by August 30, 2026, as required by 40 CFR Part 257.81(c)(4).

Sincerely,
SANBORN, HEAD & ASSOCIATES, INC.



Lisa L. Damiano, PE
Senior Project Manager



Eric S. Steinhauser, PE, CPESC, CPSWQ
Senior Vice President

LLD/ESS: lld

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