



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MA 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 13, 2010

Linda T. Landis, Senior Counsel
Public Service Company of New Hampshire
P.O. Box 330
Manchester, NH 03305-0330

Re: Information Request for NPDES Permit Re-issuance, NPDES Permit No: NH0001473

Dear Ms. Landis:

Thank you for the opportunity to clarify the information and timeframes for its delivery as stipulated in the Environmental Protection Agency Region I's (EPA Region I) May 4, 2010, Clean Water Act Section 308 Information Request (the "308 letter"), as amended by EPA's June 1, 2010 letter (EPA's June 1, 2010 letter was in response to Public Service of New Hampshire's (PSNH) May 20, 2010 request for an extension of the due date for certain information).

This letter addresses two items contained in the May 4, 2010, 308 letter on which PSNH needs clarification: 1) the status of site specific wedgewire screen pilot studies at Schiller Station; and, 2) PSNH's rationale for stating that the costs of closed-cycle cooling at Schiller Station are wholly disproportionate to the environmental benefits.

With regard to the status of pilot studies concerning wedgewire screen technology at Schiller Station, EPA has determined that PSNH has provided an adequate response. In its June 17, 2010, letter to EPA, PSNH states, in footnote 1, that "To the extent EPA believes PSNH already has begun a site-specific study (beyond the informal but knowledgeable assessment of experienced engineers), that is incorrect." Therefore, PSNH has addressed EPA's original inquiry and no further response is required on the progress made to date by PSNH on any site specific wedgewire screens studies for Schiller Station.

Similarly, EPA has determined that PSNH has provided an adequate response regarding its rationale for claiming, as it did in its October 2008 report, that closed-cycle cooling for Schiller Station is wholly disproportionate to the environmental benefits. Specifically, PSNH states in its June 17, 2010, letter that "... based solely on a comparison of the capital costs of the various technologies and their respective I&E performance - the only reasonable conclusion is that closed cycle cooling costs are wholly disproportionate to their environmental benefits."

In summary, and to provide the clarification sought by PSNH, the only outstanding items due in response to EPA's May 4, 2010 308 letter are the: 1) Application for renewal of NPDES Permit No NH0001473 (due August 9, 2010); and 2) Thermal Discharge Information (the characterization of the thermal component of the once-through cooling water is due August 9, 2010, and the last report on the thermal monitoring in the Piscataqua River is due November 30, 2010).

To the extent that PSNH wishes to submit additional, relevant information to support its conclusion(s) regarding the Best Technology Available for Schiller Station's cooling water intake structure (or any other permitting-related information); it is free to do so. Any such submittal is not required by EPA's May 4, 2010 Clean Water Act Section 308 Information Request (as amended by EPA's June 1, 2010 letter) and therefore PSNH's request for an extension to provide this information is unnecessary. Given that the last report due under the 308 letter is November 30, 2010, and that EPA expects to spend a fair amount of time drafting permit conditions that accurately reflect the considerable changes made by PSNH to its Schiller facility since issuance of the last permit, PSNH's self-imposed deadline of October 22, 2010 for submitting additional information should be adequate.

Please contact Damien Houlihan of my staff at (617) 918-1586 with any technical questions. Legal questions should be directed to Mark Stein at (617) 918-1077.

Sincerely,



Stephen S. Perkins, Director
Office of Ecosystem Protection

Cc: ✓ Mark Stein, EPA
Damien Houlihan, EPA
William Smagula, PSNH
Allan Palmer, PSNH
Stergios Spanos, NH DES