

Puleo, Shelley

From: allan.palmer@nu.com
Sent: Friday, October 17, 2014 5:06 PM
To: DeMeo, Sharon M.
Cc: Stein, Mark; Taylor, Spence; Barze, Bruce; landilt@nu.com
Subject: Schiller Station Supplemental 308 Response
Attachments: LTL Cover Letter.pdf; Schiller 308 Response Supplement.pdf

Sharon,

In response to an EPA 308 letter, PSNH submitted a report prepared by Enercon Services in 2008 to provide information and conceptual-level engineering and feasibility analyses on various CWIS technologies and operational measures designed to reduce impingement/entrainment. A few more targeted reports have since been prepared and submitted by both Enercon and Normandeau Associates in response to more direct requests from EPA. Please find attached a follow-up submittal from Enercon that updates and supplements the original report to address a number of changes that have occurred in the last several years, most importantly the latest 316(b) regulations. Also attached is the transmittal letter.

I will provide you with a hard copy of the report next week. Hopefully you find the information useful, we would very much like to meet to discuss the technologies when you have completed your review.

Please contact me if you have any questions. Thank you, Allan.



**Public Service
of New Hampshire**

A Northeast Utilities Company

Energy Park
780 No. Commercial Street, Manchester, NH 03101

Public Service Company of New Hampshire
P.O. Box 330
Manchester, NH 03105-0330

A Northeast Utilities Company

Linda T. Landis
Senior Counsel

(603)634-2700
linda.landis@nu.com

October 17, 2014

Electronically Transmitted

Ms. Sharon DeMeo
Environmental Engineer
U.S. Environmental Protection Agency - Region 1
Office of Ecosystem Protection (OEP06-1)
5 Post Office Square, Suite 100 (CIP)
Boston, Massachusetts 02109-3912

RE: Schiller Station – NPDES Permit – NH0001473

Dear Ms. DeMeo:

Public Service Company of New Hampshire ("PSNH") is providing the enclosed supplemental report ("Engineering Response Supplement to United States Environmental Agency CWA Section §308 Letter") to assist the Environmental Protection Agency ("EPA" or the "agency") in the development of the draft National Pollutant Discharge Elimination System ("NPDES") permit for Schiller Station in Portsmouth, New Hampshire. This report, prepared by Enercon Services, Inc., and Normandeau Associates, Inc., updates the information provided by PSNH in October 2008 in response to a Section 308 request by the agency for information related to the engineering feasibility of certain specified cooling water intake technologies and operational measures with an assessment of the potential impact on impingement and entrainment occurrence.

During the intervening six years since the initial report was provided to EPA, a great deal has changed. As a result, new, updated information is provided on the technological, operational, and regulatory changes that have occurred during that time period--all directly relevant and potentially applicable to Schiller Station. For example, under the now final Section 316(b) regulations, Schiller Station, with an Actual Intake Flow of well under 125 MGD, should be exempt from providing entrainment characterization studies as well as other assessments and studies related to entrainment reductions. In terms of complying with the impingement mortality standard, several options continue to offer promise and PSNH requests a meeting with EPA to discuss the various opportunities as presented in the report.

We hope EPA will give careful consideration to this new information. We will provide a redacted version of this report, containing confidential business information, shortly after the conclusion of the Merrimack Station comment period (October 22nd). Please do not hesitate to contact us with any questions or comments.

Sincerely,

Linda Landis
Linda T. Landis
Senior Counsel

Cc: William H. Smagula, P.E., Vice President Generation – PSNH
Mark Stein, Esq., EPA
Spencer M. Taylor, Esq., Balch & Bingham
R. Bruce Barze, Esq., Balch & Bingham
Allan Palmer – PSNH
Richard Despins – Schiller Station Manager

**THIS DOCUMENT CONTAINS PROPRIETARY, COMPANY CONFIDENTIAL
INFORMATION SUBJECT TO BUSINESS CONFIDENTIALITY CLAIM UNDER 40
C.F.R. PART 2 AND COMPARABLE STATE LAW**

**ENGINEERING RESPONSE SUPPLEMENT TO UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
CWA §308 LETTER**

**PSNH SCHILLER STATION
PORTSMOUTH, NEW HAMPSHIRE**



**Prepared for
Public Service of New Hampshire**

Prepared by:



**Enercon Services, Inc.
500 TownPark Lane
Kennesaw, GA 30144
October 2014**

**THIS DOCUMENT CONTAINS PROPRIETARY, COMPANY CONFIDENTIAL INFORMATION SUBJECT TO BUSINESS
CONFIDENTIALITY CLAIM UNDER 40 C.F.R. PART 2 AND COMPARABLE STATE LAW**