



New Hampshire Fish and Game Department

AR-192

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August 10, 2015

Mr. Jeffrey G. Andrews, P.E.
Sanitary Engineer
N.H. Dept. of Environmental Services
29 Hazen Drive, P.O. Box 95
Concord, New Hampshire 03302-0095

Dear Mr. Andrews,

New Hampshire Fish and Game Department is the agency responsible for the protection of our State's wildlife resources. Within Fish and Game, it is the Marine Fisheries Division that oversees salt water species. With this responsibility, comes the review of NPDES permits for steam electric power plants that require condenser cooling water drawn from coastal locations. The draft permit for Public Service Company of New Hampshire's Schiller Station in Portsmouth, N.H. has been forwarded to us for such a review (Permit No. NH 0001473). Obviously we are well acquainted with this power plant that has operated on the shore of the Piscataqua River over the past sixty plus years. The specifics of plant operation and the history of NPDES permitting there are well known to us.

Our review comments follow:

The Permit

Page 13, part 13, 1

- The requirement to reduce the through screen velocity to 0.5 fps will mean a major reconstruction of the old intakes which pass water at a velocity close to 1.0 fps. It is noteworthy to mention there has not been a problem with fish impingement on the travelling screens of this power plant over its many years of operation. In the 1990's, a lobster impingement problem was identified and this resulted in modification of the intake including an extension of the screen wash waters away from the intake thereby minimizing the likelihood of retrapping.

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transport that is the source of the need for periodic dredging in that particular reach of the Piscataqua.

Page 150 last paragraph

- Regarding the statement “macrocrustaceans such as horseshoe crabs”; EPA is advised *Limulus* is not a crustacean, it’s a chelicerate.

- No Attachment D was found in the package transmitted.

This concludes our comments. If there are questions on this subject, please feel free to contact me or Cheri Patterson.

Sincerely,



Glenn Normandeau
Executive Director

DEG/vjb

cc: Damien Houlihan, EPA
Philip Colarusso, EPA
Douglas E. Grout, NHFG
Cheri Patterson, NHFG