



**Public Service
of New Hampshire**

A Northeast Utilities Company

AR-261

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Mark A. Stein, Esq.
Senior Assistant Regional Counsel
U.S. EPA – Region 1
5 Post Office Square, Suite 100
Mail Code ORA-18-1
Boston, MA 02109-3912

Re: Schiller Station NPDES Permit

Dear Attorney Stein:

Public Service Company of New Hampshire ("PSNH") and its consultants are moving forward with preparation of what we believe to be a critical report to update and supplement prior information submitted to the Environmental Protection Agency ("EPA") related to the pending renewal of Schiller Station's administratively continued National Pollutant Discharge Elimination System ("NPDES") permit. Given the regulatory and technological changes that have taken place in the time since PSNH submitted its 2008 response to EPA's §308 information request (the 2008 Enercon Report), as well as operational changes and potential biological implications, we believe this supplemental report is critical in the preparation of the draft NPDES permit. Accordingly, we request that Region 1 postpone the issuance of the draft permit for Schiller Station until the agency receives and evaluates this information.

The recent finalization of the 316(b) Rule, pre-published by EPA on May 19, 2014, which directly affects the analysis of impingement and entrainment compliance options and criteria for Schiller Station, will be addressed. In addition, advances in technology will be considered, along with feasibility for the Station. Importantly, operational changes that have taken place at Schiller Station in the last three years, and resulting updated flow data, will be evaluated.

Because the information we are preparing has significant implications for the permitting process, we request that EPA give it appropriate consideration prior to issuing the draft permit. We look forward to sharing this supplemental analysis with EPA as soon as it is available. Please let me know if you have any questions or concerns about this ongoing effort.

Yours truly,

Linda T. Landis
Senior Counsel

Cc: William H. Smagula, Vice President Generation - PSNH
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