

Gaito, Danielle

From: Stein, Mark
Sent: Friday, June 16, 2017 11:38 AM
To: Linda T. Landis (linda.landis@eversource.com)
Cc: Gaito, Danielle
Subject: Question related to the Administrative Record for the Schiller Station Permit

Categories: Record Saved - Shared

Hi Linda –

This email concerns the Schiller Station NPDES permit.

In October 2008, PSNH submitted a report prepared by Enercon for PSNH in response to an EPA information request letter sent under Clean Water Act Section 308. PSNH made a business confidentiality claim under 40 C.F.R. Part 2 and comparable State law over certain pages of the Enercon report, including pages presenting cost estimates for various cooling water intake structure technologies. To EPA's knowledge, PSNH has not withdrawn this CBI claim. EPA has, however, obtained a memorandum dated March 31, 2014, from Dick Hahn of ESS Group to Steve Wood of the New Hampshire Public Utilities Commission (NHPUC) titled "PSNH Asset Environmental Review" that is available on the NHPUC website (<http://www.puc.state.nh.us/Electric/PSNH%20Asset%20Env%20Rpt%2003312014Rev.pdf>).

This memorandum includes cost estimates for cooling towers at Schiller Station, which, according to the memorandum, are based on Enercon's report. As this memorandum is publically available, EPA plans to use these cost estimates in responding to comments on the Draft Permit.

We are wondering whether, in light of the fact that the Enercon report appear to have been made public, PSNH would be willing to withdraw its claim of CBI for that report. If so, we could then include it in the public portion of the administrative record for Schiller Station. It is always preferable to us, if a CBI designation is not truly needed, to include relevant documents in the public record.

Please let me know. Thanks.

- Mark

Mark A. Stein
Senior Assistant Regional Counsel
US EPA – Region 1
5 Post Office Square
Boston, MA 02109-3912

Tel: (617) 918-1077
Fax: (617) 918-0077
Email: stein.mark@epa.gov