From: linda.landis@nu.com
To: Stein, Mark
Cc: allan.palmer@nu.com; DeMeo, Sharon M.
Subject: Re: FW: Schiller Station NPDES issues
Date: Wednesday, June 18, 2014 11:06:07 AM

Hi Mark. I hope you are having a good summer.
As you are aware, we are fully engaged at this time in preparing comments on the revised draft NPDES permit for Merrimack Station. We very much appreciate the extension we were given for preparation of the comments given our limited resources and the critical importance of the comments which are certain to be a focal point for much controversy.
I understand you need a response on the Schiller Station report at issue, so we will plan to review it and the attachments within the next couple weeks to determine what parts of the report are still appropriately considered confidential business information. My goal would be to get you a redacted version within three weeks.
However, in light of 316(b) and its implications, and potential advances in technology since the report was written, we would like the opportunity to update the report.. It was my understanding that EPA was going to work toward issuing the draft NPDES permit for Schiller Station in the fall of 2014 and we could proceed with that timeframe in mind. Please let me know if this is an option.
Can you tell me if EPA is still targeting the fall of 2014 for issuing the draft Schiller Station permit? We hope that EPA is mindful of our need to focus on the draft Merrimack Station permit in the next two or three months and that EPA would not plan to issue the permit prior to the October 22nd close of the comment period for the Merrimack Station permit. I would appreciate an update on the anticipated schedule.
In the meantime, I hope you have summer vacation plans and can enjoy some time off. Linda

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From: "Stein, Mark" <Stein.Mark@epa.gov>
To: Linda T. Landis/NUS@NU,
Cc: "DeMeo, Sharon M." <Demeo.Sharon@epa.gov>, Allan G. Palmer/NUS@NU
Date: 06/13/2014 08:59 AM
Subject: FW: Schiller Station NPDES issues

Hi Linda –
I hope you're doing well. This email pertains to Schiller, rather than Merrimack.

Last summer we raised an issue to you regarding the Enercon report mentioned in Allan's email appended below. Specifically, we asked whether PSNH could modify its proposed designation of the entire Enercon report as CBI. Such modification could potentially entail either removing the designation in its entirety or providing EPA with a redacted version of the report in which the company would designate only certain portions of the report as CBI.

Alan Palmer's email below indicated that you were working on generating a possible redacted report. Please let us know if you have been able to, or will be able to, follow through on that effort?

The reason for this inquiry is that EPA staff is working on the Schiller permit and is looking to rely upon the Enercon report, among other things, in our written analysis. We would like to be able to discuss certain material from the report in our written record, and would like to include as much of the report as possible in the publicly available portion of our administrative record for the draft permit (as opposed to having to place the entire report in a non-public, CBI portion of the administrative record). Being able to make as much of the material as possible publicly available will improve our ability to discuss the relevant issues in as clear a way as possible in our written record. It will also facilitate the public comment process.

If you are unable voluntarily to remove all or some of the CBI designation, EPA may have to request formal substantiation of the CBI designation proposed for the material. *See* 40 C.F.R. § 2.204(a). You may remember that we have gone through that process in the past for certain information related to the Merrimack Station permit. We have been considering that process but would like to avoid that effort, if possible.

Please let me know your thoughts on this when you have a chance. Thanks.

Sincerely,

Mark Stein

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From: allan.palmer@nu.com [mailto:allan.palmer@nu.com]
Sent: Wednesday, July 31, 2013 2:57 PM
To: Cobb, Michael
Cc: DeMeo, Sharon M.; Houlihan, Damien; linda.landis@nu.com; Stein, Mark
Subject: Schiller Station NPDES issues

Hello again Michael.

As we discussed Monday, the Enercon follow-up report with the majority of your remaining answers was just being completed when you returned the latest email update with a new question on dual flow screens. We directed Enercon to postpone the report until they were able to include a response to your new question 7. (see below). We hope to provide you the report with all of the answers within the next two weeks. With the regard to the remaining issues:

- The Enercon Report is sizable and contains information that is confidential to both PSNH and third party vendors. Linda Landis is working through the document to identify areas that do not require protection. Please have Attorney Stein contact Ms. Landis if more details are required at this time.

- Enercon is providing an overview of a fish return system which we can discuss once you have a chance to review the follow-up report.
- With regard to turning off circ pumps when the generating units come off-line, we are currently considering whether the practice can be followed under all circumstances, including during short term standby status. To date, we have made no changes.

Thanks, Allan.

From: "Cobb, Michael" <Cobb.Michael@epa.gov>

To: Allan G. Palmer/NUS@NU
Cc: Linda T. Landis/NUS@NU, "Stein, Mark" <Stein.Mark@epa.gov>, "DeMeo, Sharon M." <Demeo.Sharon@epa.gov>, "Houlihan, Damien" <houlihan.damien@epa.gov>

Date: 07/17/2013 01:55 PM
Subject:

Good afternoon Allan,

This is to follow-up regarding information previously requested by EPA. Here are the items that are still unresolved (your 4/2/13 responses are in red):

1. Either a redacted version of the October 2008 Response to EPA's CWA § 308 letter or a letter from PSNH releasing the CBI designation for the same report.

EPA must produce a publicly reviewable record and when an entire report is claimed CBI, this becomes difficult. If PSNH is unable or unwilling to provide a redacted version, EPA will have no choice but to initiate formal procedures in accordance with 40 CFR Part 2, Subpart B to substantiate PSNH's assertion that your entire submission is CBI.

2. … Please also include intake velocity calculation at the intake point of the Unit 4 pipe based on maximum design flow.
We have asked Enercon to analyze the velocity at the bar rack at the offshore inlet and will provide the estimate when available.

3. Please provide further explanation why the installation of multi-disc screens would result in higher through-screen velocities especially when combined the Unit 3 renovations, since the Unit 3 renovations is reported to reduce intake velocity. EPA notes that for Merrimack Station, PSNH reported that the installation of multi-disc screens would reduce impingement mortality by 69% for Unit 1 and 80% for Unit 2.

We are working with Enercon to work out the details to this issue and will provide the response when it is available.

4. Please provide further explanation why the installation of WIP screens would result in smaller screen surface area overall (and higher through-screen velocities) especially when combined the Unit 3 renovations, since the Unit 3 renovations is reported to reduce intake velocity.
We are working with Enercon to work out the details to this issue and will provide the response when it is

available.

5. Please provide an evaluation of a combined fish return system that connects both screen houses and engineered to transport fish away from the intake structures based on the direction of tidal flow.
We have not considered a combined fish return system and, as stated in the 2008 Report, additional studies are required to identify optimum discharge locations and determine the feasibility of adequate support structures. This work represents a significant effort with commensurate costs for both biological and engineering evaluations. PSNH requests a discussion with EPA before we commit to such an evaluation.
EPA would like to set up a time it discuss this option, which is a potential, viable component of BTA at Schiller Station. Thank you.

6. Your 5/28/13 email includes a discussion of the unlikelihood of Schiller Station running any of its Units with only one pump. You also state that "[r]egarding **shutdown**, we believe all three units can turn off both pumps within roughly two hours of securing the turbine. This modification could reduce station water flow by an appreciable amount and we are currently considering implementing this change as standard procedure." (emphasis added) Please confirm whether you are referring to the infrequent "shutdown" periods used for maintenance or the more frequent "standby" status periods. Also, please verify whether this procedure has been or will be implemented in the future.

7. EPA also requests additional information about the feasibility of dual-flow screens at Schiller Station. PSNH determined that dual-flow screens were technologically infeasible because the size of the existing intake structure could not accommodate a dual-flow retrofit. PSNH also indicated that total replacement or extensive modifications of the intake structures would be required at a cost much higher than the cost of the screens themselves. Please provide further explanation or supporting information to document or explain these assessments.

Please feel free to contact me if you have any questions or would like to discuss any of these items more thoroughly.

Best,

Michael Cobb
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