



**Public Service
of New Hampshire**

A Northeast Utilities Company

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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 / *LL*
Linda T. Landis
Senior Counsel

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