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To: [Houlihan, Damien](#); [Gaito, Danielle](#); [Curley, Michael](#)
Cc: [Andrews, James](#); [Palmer, Allan](#); [Gidiere, Stephen](#); [DeLawrence, Tom](#)
Subject: RE: GSP Schiller NPDES Permit Modification Request
Date: Thursday, May 20, 2021 7:08:28 PM
Attachments: [APPENDIX B TABLE SPP DENSITY.xlsx](#)

Please allow this to serve as follow-up to our May 12 meeting, in which we discussed GSP Schiller's March 31, 2021 request to modify certain 316(b)-portions of the 2018 NPDES permit for Schiller Station. Significant progress was made during the call and I think it's fair to say that all parties agree a modification of the current permit is the best path forward given the results of the wedgewire screens pilot study and the current operational status of the facility. We appreciate the Region's timely attention to this modification request and will make ourselves available as often as needed to discuss any issues that may arise in this process.

The following addresses the three principle requests/questions the Region raised during the May 12 meeting:

1. November – March Operations: GSP proposed a flow reduction plan in its March 31 permit modification request to address entrainment and impingement at Schiller Station. The plan allowed for 100% operation of the 3 units during the seasonal period November through March. This is a period with very low entrainment potential (compared to June through August), and the 100% operation of all 3 units reflected needed flexibility during the colder months, which can be challenging in the Northeast and the ISO-NE system.

With further review, and understanding EPA believes that although entrainment potential during this time is relatively low, it could involve important fish species (cod and flounder), GSP proposes an additional 40% reduction during this November through March period. GSP proposes calculating one station capacity factor for the combined operations of all three units over the course of the seasonal period (i.e., one limit applicable to the collective three units for the entire period of November through March) to establish compliance with this 40% reduction.

2. Normandeau's Appendix B: The Region requested an Excel version of Appendix B from NAI's 2020 report entitled *Evaluation of the Entrainment Reduction Performance of 0.8-mm and 3.0-mm Cylindrical Wedgewire Screens at Schiller Station*. That appendix is attached. Please contact us with any questions regarding the data set out in this appendix.
3. Impingement Compliance Option: GSP Schiller is continuing to evaluate its various compliance options for the units/intakes and will provide an update on its preferred path as soon as possible.

Thank you.

Lynn Tillotson

Vice President

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