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By Electronic Mail/U.S. Mail

June 21, 2021

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U.S. Environmental Protection Agency
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Water Technical Unit
5 Post Office Square, Suite 100 (OES04-SMR)
Boston, MA 02109-3912

Attn: Compliance Supervisor
New Hampshire Department of
Environmental Services
Water Division
Wastewater Engineering Bureau
P.O. Box 95
Concord, New Hampshire 03302-0095

Re: GSP Schiller Station NPDES Permit No. NH0001473
Cooling Water Intake Structures (CWA § 316(b)) – Wedgewire Screen Design
Information

Dear All:

Please find enclosed a report from Enercon Services, Inc. submitted by GSP Schiller LLC (“GSP Schiller”) pursuant to Part I.A.11.b.1.v. of NPDES Permit No. NH0001473 (the “Permit”), issued by EPA Region 1 (“Region 1”) on April 6, 2018 (and modified on March 25, 2020). Specifically, the enclosed report provides a design of what a wedgewire screen arrangement at Schiller Station would consist of in light of the results of the wedgewire screen pilot study completed at the facility in accordance with Part I.A.11.b.1.i.-ii of the Permit.

GSP Schiller continues to believe that timely modification of the Permit in accordance with the permit modification request the company filed with Region 1 on March 31, 2021, represents the best path forward to address Clean Water Act § 316(b) requirements at the facility. As we have discussed, since June 1, 2020, all steam units at Schiller Station have been in a long-term outage status with the Independent System Operator of New England (ISO-NE) and remain in this outage status as of the date of this correspondence. Based on this long-term outage status and

GSP Schiller's evaluation of the prospective operational profile of the facility, GSP Schiller expects any operation of the Schiller Station steam units in the future to be intermittent and thus believes the operational controls it requested in its March 31, 2021 modification request, in lieu of the installation and operation of costly and potentially unreliable physical equipment, can better address impingement and entrainment, in accordance with 40 C.F.R. Part 125, Subpart J. The enclosed report corroborates GSP Schiller's position on these § 316(b) issues and provides a tangible point of comparison for Region 1 as it continues to process GSP Schiller's permit modification request.

GSP Schiller has designated the enclosed Enercon report as confidential business information ("CBI") pursuant to EPA regulations at 40 C.F.R. Part 2, which incorporate the confidentiality standards in Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4), and the Trade Secrets Act, 18 U.S.C. § 1905.

Please do not hesitate to contact me with any questions or concerns you may have. Thank you for your time and cooperation in this matter.

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I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Elizabeth H. Tillotson
Vice President
GSP Schiller LLC

Cc: Mark Stein, EPA
Michael Curley, EPA
James Andrews, GSP Schiller LLC