



GSP SCHILLER

400 Gosling Road
Portsmouth, NH 03801

July 30, 2020

VIA OVERNIGHT MAIL (W/O ENCLOSURES)

U.S. Environmental Protection Agency
Office of Environmental Stewardship (OES)
Water Technical Unit
Coordinator
5 Post Office Square, Suite 100 (OES04-SMR)
03)
Boston, MA 02109-3912

VIA ELECTRONIC MAIL

U.S. Environmental Protection Agency
Office of Ecosystem Protection
EPA/OEP NPDES Applications
5 Post Office Square, Suite 100 (OEP06-
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Boston, MA 02109-3912
R1NPDES.Notices.OEP@epa.gov

VIA OVERNIGHT MAIL

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

Re: Granite Shore Power Schiller LLC
Schiller Station, Portsmouth, New Hampshire
NPDES Permit No. NH0001473
Wedgewire Screen Reports & Compliance Notification

To Whom It May Concern:

Enclosed please find reports from Enercon Services, Inc. and Normandeau Associates, Inc., submitted in accordance with Part I.A.11.b.1.iii. of NPDES Permit No. NH0001473 (Permit), which was issued on April 6, 2018, became effective July 1, 2018, and was modified on March 25, 2020. Please allow this correspondence to also serve as GSP Schiller LLC's (GSP Schiller)¹ associated notification of compliance to the U.S. Environmental Protection Agency (EPA), pursuant to Part I.A.11.b.

As you will see in the enclosed reports, the 0.8 mm and 3.0 mm wedgewire screens (WWS) did not perform as predicted during the pilot testing. Myriad operational/equipment issues arose, unanticipated screen degradation (*e.g.*, fouling, clogging, biogrowth, damage) occurred due to the uniquely harsh conditions in the Piscataqua River, and percent reductions in entrainment were significantly less than expected (including prior to the aforementioned equipment and

¹ Although the Permit identifies the permittee as Granite Shore Power Schiller LLC, the legal name of the Permittee is GSP Schiller LLC.

screen degradation issues), meaning reductions in associated entrainment mortality were also not realized. Consequently, implementation of full-scale WWS at Schiller Station would be imprudent.

Currently the Schiller Station units are in extended outage with ISO-NE. None of the units have a capacity obligation for the current capacity year and do not anticipate operations. GSP Schiller is currently evaluating viable options and next steps for the units. Thus, the underlying operational and environmental conditions on which EPA based its Clean Water Act § 316(b) best technology available decision have fundamentally changed.

GSP Schiller plans to request a meeting with appropriate EPA personnel in the near future to discuss modifying the Permit due to the aforementioned circumstances.

GSP Schiller appreciates the agency's attention to this matter. Please contact me with any questions or concerns you may have.

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

Executive Director – Administration and Regulatory Affairs
Granite Shore Power

cc: Mark Stein, EPA
Michael Cobb, EPA
Ken Moraff, EPA
Jim Andrews, GSP