UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JAN 18 2018

Sharon G. Newman, Esq.
PretiFlaherty
One City Center
PO Box 9546
Portland, ME 04112 – 9546
snewman@preti.com

Linda T. Landis, Esq.
Senior Counsel
Eversource Energy
780 N. Commercial Street
PO Box 330
Manchester, NH 03105 – 0330

Re: Transfer of NPDES Permits for Merrimack Station (Permit No. NH0001465), Newington Station (Permit No. NH0001601), and Schiller Station (Permit No. NH0001473)

Dear Ms. Newman and Ms. Landis:

On November 10, 2017 Attorney Mark A. Stein, Senior Assistant Regional Counsel for the U.S. Environmental Protection Agency, Region 1, received a letter from Attorney Linda T. Landis, Senior Counsel for Eversource Energy, notifying EPA of the anticipated transfer of ownership of Merrimack Station (Permit No. NH0001456), Newington Station (Permit No. NH0001601), and Schiller Station (NH0001473) to Granite Shore Power LLC ("Granite Shore"). Subsequently, on January 10, 2018 EPA received a letter from Sharon G. Newman representing Granite Shore notifying EPA that the sale of these three facilities from Public Service Company of New Hampshire ("PSNH") to Granite Shore closed on January 10, 2018. Pursuant to the terms of this transaction, GSP Merrimack LLC, GSP Newington LLC, and GSP Schiller LLC, all subsidiaries of Granite Shore, are acquiring, respectively, the assets of Merrimack Station, Newington Station, and Schiller Station.

Three new signed National Pollutant Discharge Elimination (NPDES) permit cover pages are attached to reflect the transfers of ownership and permit obligations for these three facilities. These new cover pages are the only part of these permits being modified at this time to reflect the transfer of ownership since Ms. Landis' letter of November 10, 2017 indicated that Granite Shore has no plans to change either the operation of these facilities or the specific operational personnel with regard to management of environmental matters following the closing.

Since Granite Shore satisfies the substantive and procedural requirements of 40 CFR §122.61(a) and/or §122.63(d), each of these permit modifications for the transfer of ownership are effective as of January 10, 2018.

If, in the future, there is a discharge of pollutants not covered by the terms and conditions of the existing permits for Newington Station, Merrimack Station, and Schiller Station, into surface waters of the United States, an application for discharge must be made to this Agency at least 180 days in advance of the proposed discharge (See 40 CFR Section 122.21(c)(1)). Any proposed new discharge which meets the definition of new source at 40 CFR Section 122.2 must meet the requirements of any applicable "new source performance standards" for your industry. Discharge to waters without obtaining a permit would violate Section 301(a) of the Clean Water Act, and would subject you to the civil and/or criminal enforcement provisions of Section 309 of the Act.

The new transfer of ownership information will be entered into the Integrated Compliance Information System (ICIS), EPA's NPDES database of permittee information. EPA's ICIS staff will ensure that the records for Newington Station, Merrimack Station, and Schiller Station are updated accordingly to reflect the transfer of ownership to Granite Shore Power LLC ("Granite Shore").

If you have any questions regarding this transfer of ownership, do not hesitate to contact Shelley Puleo of my staff at (617) 918-1545, or she can be emailed at puleo.shelly@epa.gov.

Sincerely,

David M. Webster

David M. Webster, Chief
Water Permits Branch

Enclosure

cc: Robert A. Bersak, Chief Regulatory Counsel, Eversource Energy
Mark Stein, Senior Assistant Regional Counsel, EPA-Region 1
David B. Van Slyke, Esq., Counsel to Granite Shore
Leann M. Plagens, ES & H, Granite Shore - VIA EMAIL
Stergios Spanos, NHDES
Diane Boisclair, ICIS-EPA-Region 1

Permit Modification for Transfer of Ownership

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

In accordance with the substantive and procedural requirements of the Federal Clean Water Act, 40 CFR Section 122.61(b) and/or 40 CFR Section 122.63(d), the Environmental Protection Agency ("EPA") acknowledges the transfer of ownership and coverage under permit number NH0001601 from Public Service Company of New Hampshire (Newington Station) to:

GSP Newington LLC

This transfer of ownership permit modification is effective on January 10, 2018. The authorization to discharge expired at midnight, October 30, 1998. However, since a timely application was filed, this permit has been administratively continued pursuant to 40 CFR §122.6, 48 Fed. Reg. 14158, April 1, 1983.

Thus, GSP Newington LLC located at 165 Gosling Road, Newington, NH 03801 is authorized to discharge to the Piscataqua River in compliance with effluent limitations in the permit issued on September 30, 1993.

This permit consists of 16 pages in Part I including effluent limitations, monitoring requirements, etc., 15 pages in Attachment A including the basis for a storm water pollution prevention plan, and 22 pages in Part II (dated April 6, 1990) including General Conditions and Definitions. These conditions remain in effect for the new owner.

Signed this 16th day of January, 2018

Ken Moraff, Director
Office of Ecosystem Protection
Environmental Protection Agency
Region 1
Boston, MA

Permit Modification for Transfer of Ownership

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

In accordance with the substantive and procedural requirements of the Federal Clean Water Act, 40 CFR Section 122.61(b) and/or 40 CFR Section 122.63(d), the Environmental Protection Agency ("EPA") acknowledges the transfer of ownership and coverage under permit number NH0001473 from Public Service Company of New Hampshire (Schiller Station) to:

GSP Schiller LLC

This transfer of ownership permit modification is effective on January 10, 2018. The authorization to discharge expired at midnight, October 11, 1995. However, since a timely application was filed, this permit has been administratively continued pursuant to 40 CFR §122.6, 48 Fed. Reg. 14158, April 1, 1983.

Thus, GSP Schiller LLC located at 400 Gosling Road, Portsmouth, NH 03801, is authorized to discharge to the Piscataqua River in compliance with effluent limitations in the permit issued on September 11, 1990.

This permit consists of 24 pages in Part I including effluent limitations, monitoring requirements, etc., 22 pages in Part II (dated April 6, 1990) including General Conditions and Definitions, 7 pages of a May 31, 1991 minor modification, and 1 page of a January 24, 1995 minor modification. These conditions remain in effect for the new owner.

Signed this 16th day of January, 2018

Ken Moraff, Director
Office of Ecosystem Protection
Environmental Protection Agency
Region 1
Boston, MA

Permit Modification for Transfer of Ownership

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

In accordance with the substantive and procedural requirements of the Federal Clean Water Act, 40 CFR Section 122.61(b) and/or 40 CFR Section 122.63(d), the Environmental Protection Agency ("EPA") acknowledges the transfer of ownership and coverage under permit number NH0001465 from Public Service Company of New Hampshire (PSNH – Merrimack Station) to:

GSP Merrimack LLC

This transfer of ownership permit modification is effective on January 10, 2018. The authorization to discharge expired at midnight, July 25, 1997. However, since a timely application was filed, this permit has been administratively continued pursuant to 40 CFR §122.6, 48 Fed. Reg. 14158, April 1, 1983.

Thus, GSP Merrimack LLC located at 431 River Road, Bow, NH 03301 is authorized to discharge to the Merrimack River in compliance with effluent limitations in the permit issued on June 25, 1992.

This permit consists of 22 pages in Part I including effluent limitations, monitoring requirements, etc., Attachment I, Location of Sampling Stations, 22 pages in Part II (dated April 6, 1990) including General Conditions and Definitions, 5 pages of an October 22, 1992 minor modification, and 1 page of an October 27, 1993 minor modification. These conditions remain in effect for the new owner.

Signed this 16th day of January, 2018

Ken Moraff, Director
Office of Ecosystem Protection
Environmental Protection Agency
Region 1
Boston, MA