

## The State of New Hampshire

## Department of Environmental Services

## Michael P. Nolin Commissioner



August 26, 2005

Arthur Auclair, Jr.
Senior Environmental Coordinator
PSNH – Merrimack Station
97 River Rd.
Bow, NH 03304-3314

Subject: National Pollutant Discharge Elimination System (NPDES)

Compliance Evaluation Inspection (CEI)

PSNH – Merrimack Station, NPDES Permit # NH0001465

Dear Mr. Auclair:

On August 16, 2005, as a representative of the Department of Environmental Services, Water Division, Wastewater Engineering Bureau (DES), I conducted a NPDES CEI at Merrimack Station. Objectives of a CEI include determining compliance with NPDES permit conditions, verifying accuracy of permit required information and adequacy of permittee sampling and monitoring. The following people were present during this CEI:

Art Auclair, Sr. Environmental Coordinator, Merrimack Station Ken Kroh, Chemistry Foreman-Chemistry Dept., Merrimack Station Stephanie Larson, Environmental Inspector, DES Margaret Bastien, P.E., Compliance Engineer, DES

Please find attached a copy of EPA's Water Compliance Inspection Report Form 3560.

The deficiencies and observations/recommendations DES observed during the CEI are summarized as follows:

## Deficiencies (Response Required):

- 1) Personnel entered an incorrect Frequency of Analysis (FOA) code on the April 2005 Discharge Monitoring Report (DMR). Personnel indicated that they had analyzed Total Residual Oxidants (TRO) at outfall 001A once per week – FOA code 01/07. However, personnel were only able to sample in the second and third weeks – twice per month, or FOA code 02/30. A corrected and recertified copy of this DMR was not submitted to EPA and DES. Please submit this information as required.
- 2) The 2005 EPA DMR Instructions require zeroes "0" to be reported for all results less than the Minimum Detection Level (MDL) for that parameter.

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DES requests that you submit your inspection response to DES by **September 30, 2005**. If DES does not receive a signed, complete response within the allowed time frame, DES may proceed with an appropriate enforcement action.

Please mail your inspection response to:

Stephanie Larson NHDES-WWEB P.O. Box 95 Concord, NH 03302-0095

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If you have any questions, please call me at (603)271-1493.

Sincerely,

Stephanie Larson, Environmental Inspector

Permits & Compliance Section Wastewater Engineering Bureau

Enclosures: EPA Water Compliance Inspection Report Form 3560

Ce: Joy Hilton, USEPA-Region 1, Water Technical Unit John R. Bush, P.E., Administrator, DES Margaret Bastien, P.E., Compliance Engineer, DES File