



The State of New Hampshire
Department of Environmental Services

AR-1272



November 15, 2006

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

Subject: National Pollutant Discharge Elimination System (NPDES)
Compliance Evaluation Inspection (CEI)
Public Service Company of New Hampshire (PSNH) – Merrimack Station
NPDES Permit # NH0001465

Dear Mr. Auclair:

On October 27 and November 6, 2006, 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 confirming 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 Department, Merrimack Station
Dan Fradette, Maintenance Supervisor, Merrimack Station
Stephanie Larson, Environmental Inspector, DES

Included is a copy of EPA's Water Compliance Inspection Report Form 3560-3 and an updated copy of the summary of Discharge Monitoring Report (DMR) violations discussed during the inspection.

The deficiencies DES observed during the CEI are summarized as follows:

Deficiencies (Response Required):

1) DMRs

- a) Personnel did not sign the September 2005 DMR for outfall 001 A. DMRs must be certified by signing and dating to verify that the information is true, accurate and complete.
- b) On the November 2005 DMR for outfall 003 1, personnel did not fill in the Number of Exceedances box for pH.

More attention should be exercised when completing the DMRs, since PSNH personnel are certifying that the information on the DMR is true, accurate and complete.

On October 30, 2006 DES received corrected and recertified DMRs for September 2005 and November 2005.

P.O. Box 95, 29 Hazen Drive, Concord, New Hampshire 03302-0095
Telephone: (603) 271-3503 • Fax: (603) 271-2982 • TDD Access: Relay NH 1-800-735-2964
DES Web site: www.des.nh.gov

Water Compliance Inspection Report

9/16/05

Section A: National Data System Coding (i.e., PCS)

Transaction Code			NPDES										yr/mo/day					Inspection Type		Inspector		Fac Type							
1	N	2	5	3	N	H	0	0	0	1	4	6	5	11	12	0	5	0	8	1	6	17	18	C	19	S	20	2	
Remarks																													
21																													66
Inspection Work Days			Facility Self-Monitoring Evaluation Rating										B1		QA		-----Reserved-----												
67		1	0	69	70	4	71	N	72	N	73		74	75			80												

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) PSNH Merrimack Station 97 River Road Bow NH 03304-	Entry Time/Date 10:28 AM 8/17/2005	Permit Effective Date 7/25/1992
	Exit Time/Date 12:57 PM 8/17/2005	Permit Expiration Date 7/25/1997
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Art Auclair, Jr. Sr. Environmental Coordinator Ken Kroh Chemistry Foreman-Chemistry Dept.	Other Facility Data Phone: (603)224-4081 Fax: (603)623-2334	
Name, Address of Responsible Official/Title/Phone and Fax Number John MacDonald VP Engineering and Operations P.O. Box 330 Manchester NH	Phone: ()634-2236 Fax: (603)634-2213 Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Storm Water	<input checked="" type="checkbox"/> Multimedia
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Combined Sewer Overflow	<input type="checkbox"/> Other:
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Operations/Maintenance	<input type="checkbox"/> Sanitary Sewer Overflow	<input type="checkbox"/> Other:
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> CAFO	<input type="checkbox"/> Other:

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

See attached inspection letter or report

Name(s) and Signature(s) of Inspector(s) Stephanie Larson <i>Stephanie Larson</i>	Agency/Office/Phone and Fax Numbers NHDES/WD/WWEB (603) 271-3908/4128	Date 8/24/2005
Margaret Bastien, P.E. <i>Margaret Bastien</i>		
Signature of Management QA Reviewer Margaret Bastien, P.E. <i>Margaret Bastien</i>	Agency/Office/Phone and Fax Numbers NHDES/WD/WWEB (603) 271-3908/4128	8/24/2005

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES										yr/mo/day					Inspection Type		Inspector		Fac Type								
1	N	2	5	3	N	H	0	0	0	1	4	6	5	11	12	0	6	1	0	2	7	17	18	C	19	S	20	2	
Remarks																													
21																													66
Inspection Work Days				Facility Self-Monitoring Evaluation Rating										B1		QA		-----Reserved-----											
67		2	0	69	70	4	71	N	72	N	73			74	75			80											

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) PSNH - Merrimack Station 97 River Rd. Bow, NH 03301	Entry Time/Date 10:00 AM 10/27/2006	Permit Effective Date 7/25/1992
	Exit Time/Date 1:00 PM 11/6/2006	Permit Expiration Date 7/25/1997
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Art Auclair, Sr. Environmental Coordinator Ken Kroh, Chemical Foreman, Chemistry Department Dan Fradette, Maintenance Supervisor Phone: (603)224-4081 Fax:	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number John M. MacDonald Vice President Phone: Fax:		
Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Operations/Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
E0013	Improper/Incorrect Reporting (DMR)

Signature of Inspector <i>Stephanie Labon</i>	Agency/Office/Phone and Fax Numbers NHDES/WD/WWEB (603) 271-3908/4128	<i>11/14/06</i>
Signature of Management QA Reviewer Margaret Bastien, P.E. <i>Margaret Bastien</i>	Agency/Office/Phone and Fax Numbers NHDES/WD/WWEB (603) 271-3908/4128	<i>11/16/06</i>

Month	Parameter	Type	Units	Permit Limit	Result	# of violation	Reported properly?	Postmark date:	Comments
9	DMR						No	10/14/2005	001A DMR not signed; also rec'd DMRs for 002A, 003A, 003B (no discharge) and 003 1. Corrected DMR rec'd 10/30/06
10	DMR						Yes	11/15/2005	Also rec'd DMRs for 002A,003A,003B (ND) and 0031
11	DMR						No	12/14/2005	NOE box for pH left blank-003 1; rec'd DMRs for 001A, 002A, 003A and 003B (ND). Rec'd corrected DMR 10/30/06.
12	DMR						Yes	1/13/2006	DMRs rec'd also for 002A, 003A, 003B (ND), 0031, 004A, 005A and 006A (ND)

2006

1	EMP Annual Report						Yes	12/29/2005	Environmental Monitoring Program Annual Report as required by sections 6(a) and 7 of the permit
1	DMR						Yes	2/15/2006	Rec'd DMRs for 002A, 003A, 003B-ND and 0031
2	DMR						Yes	3/14/2006	Rec'd DMRs for 002A, 003A, 003B-ND and 0031
3	DMR						Yes	4/14/2006	Rec'd DMRs for 002A, 003A, 003B (no discharge) and 0031
4	DMR						Yes	5/10/2006	Also rec'd DMRs for 002A, 003A, 003B and 0031
5	DMR						Yes	6/15/2006	Rec'd DMRs for 002A, 003A, 003B and 0031; could only collect 3 weekly samples due to high river level.
6	DMR						Yes	7/14/2006	Rec'd DMRs for 002A, 003A, 003B (no discharge) and 0031.
7	DMR						Yes	8/14/2006	Rec'd DMRs also for 002A, 003A, 003B (no discharge) and 0031.
8	DMR						Yes	9/12/2006	DMR rec'd for 002A, 003A, 003B (no discharge) and 0031
9	DMR						Yes	10/16/2006	Rec'd DMRs for 002A, 003A, 003B (ND) and 0031

Merrimack Station