



D29399

September 13, 2010

Mr. Roy D. Gilbreth
NHDES/WD-WWEB
P.O. Box 95
Concord, NH 03302-0095

Subject: National Pollution Discharge Elimination System
Compliance Evaluation Inspection (CEI)
PSNH – Schiller Station
NPDES Permit Number NH0001473

Dear Mr. Gilbreth:

Public Service Company of New Hampshire hereby submits this letter in response to deficiencies noted during the CEI that took place on August 11, 2010, and, in your letter dated August 16, 2010 which stated:

- 1) The TSS drying oven thermometer is not calibrated yearly to ensure it is accurate. The thermometer must be checked against an NIST-calibrated thermometer or replaced each year with an NIST-certified thermometer.

On August 11, 2010, following the CEI, PSNH – Schiller Station located NIST disposable thermometers through General Laboratory Supply and VWR, for use in the TSS drying oven. An NIST Traceable Digital Dial Thermometer (Cat. No. 37000-428) was received and installed on August 30, 2010. Yearly replacement of the oven thermometer was added to the pre-existing job order that exists in the Production Maintenance Management System (PMMS)(our automated alert system), for replacing all thermometers on a yearly basis.

- 2) None of the in-house bench sheets indicate what edition of Standard Methods the test is referencing. The Standard Methods edition must be included with the test method on all bench sheets.

On August 11, 2010 following the CEI, the Station Environmental Coordinator (SEC)/Chemical Lab Supervisor(CLS) (Giordano/Rudolph) reviewed this finding with the laboratory staff. The bench sheets were checked and revised on this date to ensure that all included the proper test method and a reference to the edition of Standard Methods in use. Presently Schiller Station is using Standard Methods 19th edition.

- 3) Total residual chlorine (TRC) bench sheets do not provide the sampling locations for samples collected at Outfall 002, 003 and 004. The sampling locations must be provided on TRC bench sheets.

On August 11, 2010, following the CEI, the SEC/CLS (Giordano/Rudolph) reviewed the finding with the laboratory staff and revised the bench sheets used for reporting Total Residual Chlorine to include the outfall sampling locations.

- 4) The pH electrode is stored incorrectly between uses. According to the electrode instruction book under Shelf Storage (page 44) very long term electrode storage requires storing the electrode dry, provided that the electrolyte gel cartridge is removed, the reference cell is flushed out and the electrode storage bottle containing electrode storage solution is placed over the end of the probe and the cap tightened. The term dry storage is misleading, as it applies only to the electrode, not the end of the probe. During the inspection the electrode still had the electrolyte cartridge in place and the probe was not stored in electrode storage solution, meaning very long term storage requirements were not being met. As the electrode is used monthly and not mothballed, the electrode should be stored in accordance with the longer-term storage instructions (page 43) which state, "soak the electrode in storage solution

and re-establish gel at the reference junction on a daily basis to keep the electrode ready for use." No matter what electrode storage method Schiller Station uses, the electrode must be stored in accordance with the manufacturer's instructions to ensure it will operate properly when needed.

Beginning August 11, 2010 following the CEI, PSNH – Schiller Station began storing the pH electrode overnight in potassium chloride (KCl) solution in accordance with the manufacturer's storage instructions. The CLS (Rudolph) reviewed the new procedure with the laboratory staff following the CEI. Additionally signage was posted in the laboratory reminding all personnel to insert the electrode into KCl when storing the probe overnight, as per manufacturer's instructions.

If you have any questions, or need additional information, please do not hesitate to contact me directly at 603-431-2550 ext. 7349.

Very truly yours,

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE



Felicia Giordano
Senior Environmental Coordinator

cc: Joy Hilton, USEPA Region 1, Water Technical Unit
Allan Palmer, PSNH

