



DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

September 25, 2009

PSNH – Schiller Station
Felicia Giordano, Sr. Environmental Coordinator
400 Gosling Road
Portsmouth, NH 03801

Subject: National Pollutant Discharge Elimination System (NPDES)
Compliance Evaluation Inspection (CEI)
PSNH – Schiller Station
NPDES Permit N^o NH0001473

Dear Ms. Giordano:

On September 16, 2009, as a representative of the New Hampshire Department of Environmental Services, Water Division, Wastewater Engineering Bureau (DES), I conducted a NPDES CEI at PSNH - Schiller 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:

Felicia Giordano, Sr. Environmental Coordinator, PSNH - Schiller Station
Dave Corliss, Working Foreman, PSNH - Schiller Station
Stephanie Larson, Environmental Inspector, DES

Included are copies of EPA's Water Compliance Inspection Report Form 3560-3 and the Discharge Monitoring Report (DMR) violations summary for June 2008 through July 2009 (the period reviewed).

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

DEFICIENCIES (Response Required):

- 1) Proper Operation and Maintenance
 - a) Part II, Section B.1. of the NPDES permit requires the permittee at all times to properly operate and maintain all facilities and systems of treatment and control which are installed or used to achieve compliance with the permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance (QA) procedures. PSNH - Schiller Station personnel do not always correct laboratory benchsheet results correctly. Personnel sometimes write over or cross out results. Writing over and/or crossing out results to correct benchsheet errors is not a proper QA procedure. Errors should be corrected by drawing a line through the incorrect value(s), writing the correct value next to it and then initialing the correction. PSNH - Schiller Station must ensure that all personnel know the correct procedure for correcting benchsheet errors.

DES requests that PSNH - Schiller Station describe all steps taken to correct the deficiencies identified by the inspector. This description should also include the dates the deficiencies were corrected or the anticipated correction date. If the submitted response is acceptable to DES and the deficiencies are not repeat deficiencies and/or have not resulted in environmental harm, DES will close out the inspection and no further action, other than continued compliance, is required by the permittee. If DES identifies repeat deficiencies or deficiencies that result in environmental harm in this or future inspections, DES may proceed immediately with enforcement.

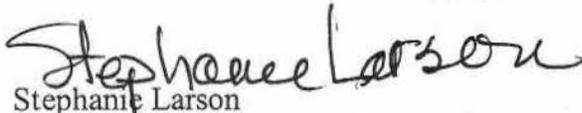
DES requests that PSNH - Schiller Station submit its response to DES by **October 23, 2009**. If DES does not receive a complete response signed by the appropriate official within the allowed time frame, DES may proceed with an appropriate enforcement action.

Please mail your inspection response to:

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

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

Sincerely,



Stephanie Larson
Environmental Inspector
Wastewater Engineering Bureau

Enclosures: EPA Water Compliance Inspection Report Form 3560-3
DMR Violations Summary (June 2008 – July 2009)

Cc: Joy Hilton, USEPA-Region 1, Water Technical Unit
Tracy Wood, P.E., Compliance Engineer, WWEB, DES
Paul Heitzler, P.E., Esq., Administrator, WWEB, DES
DES, WD, WWEB/File

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

Column 18: Inspection Type. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	M Multimedia	2 IU Sampling Inspection
B Compliance Biomonitoring	O Compliance Evaluation (oversight)	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	
L Enforcement Case Support		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

C — Contractor or Other Inspectors (Specify in Remarks columns)	N — NEIC Inspectors
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
	T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow up on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.