



**Public Service
of New Hampshire**

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November 23, 2005

The Northeast Utilities System

D23378

Ms. Joy J. Hilton
U.S. Environmental Protection Agency
Region I
1 Congress Street, Suite 1100 (SEW)
Boston, MA 02114-2023

Reference: NPDES Permit No. NH0001473, Schiller Station, Public Service Company of New Hampshire, issued September 11, 1990; modified May 31, 1991; modified January 24, 1995.

Dear Ms. Hilton:

Schiller Station
5-Day Noncompliance Notification

In compliance with Part II, Section D.1.e., of the referenced NPDES Permit, Public Service Company of New Hampshire (PSNH) submits this noncompliance notification for Schiller Station located in Portsmouth, NH. On Monday, November 21, 2005, Allan Palmer of PSNH telephoned Stephanie Larson of the NH Department of Environmental Services and you to initially report the noncompliance. This letter is to provide greater detail of the event.

Debris loading in the Piscataqua River has been extremely high due to normal fall conditions coupled with heavy and continued rain events. Operations at Schiller Station have increased the frequency of condenser cleanings to remove the excess debris that has carried over from the intake screens. Only two days after a cleaning, however, cooling water discharge temperatures indicated that the Unit 5 condenser was beginning to plug again. At 01:35 on November 9, the generating unit was reduced to the lowest possible coal-fired load and the condenser was opened for cleaning. The tube sheet was found to be nearly entirely obstructed with leaves and other river debris. Approximately 35 gallons of debris was removed from each side of the condenser which represents an extraordinarily high volume of material.

The tube sheet blockage was so extreme that discharge temperatures started to creep higher even with the unit at minimum load. Control Operators were aware of the situation but had no option other than to trip the unit. The cleaning was completed as quickly as possible and the condenser was returned to full service at 03:40. Unfortunately the average temperature differential peaked at 30.9⁰F at 03:00 which is a noncompliance of the 30.0⁰F permit limit. Temperature differentials at 02:00 and 04:00 were 23.9⁰ and 16.7⁰F, respectively, well within the limit. The Unit 5 cooling water discharge is designated as Outfall 003.

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Standard operating procedures were followed and all safeguards functioned properly. In this circumstance, however, the operators simply could not control the climbing temperatures due to extreme pluggage. To guard against a similar event, Schiller Station management is reviewing the feasibility of increasing the frequency of condenser cleanings to prevent severe pluggage during these periods of high river debris. There was also a breakdown in communications within the Operations Department that delayed the timely reporting of this incident which is being investigated. Station management will be completing a report with new or revised procedures and training requirements to ensure that we are better prepared to manage similar heavy debris events and to immediately communicate these unusual circumstances and noncompliances.

If you have any questions regarding this notification, please contact Allan Palmer, PSNH Generation, at (603)634-2439.

Very truly yours,



William H. Smagula, P.E.
Director - Generation

cc: Ms. Stephanie Larson
N.H. Department of Environmental Services
Water Division
Wastewater Engineering Bureau
Permits and Compliance Section
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