



D23601

September 21, 2007

Stephanie Larson, Environmental Inspector
NH Department of Environmental Services
Water Division – Wastewater Engineering Bureau
P.O. Box 95 - 6 Hazen Drive
Concord, NH 03302-0095

Subject: NPDES Compliance Evaluation Inspection (CEI)

Dear Ms. Larson:

Schiller Station CEI
NPDES Permit No. NH0001473

Public Service of New Hampshire Schiller Station has reviewed the deficiencies identified in the NPDES CEI of July 26, 2007. The corrective actions for the deficiencies and observations/recommendations noted during the CEI have been summarized below.

Deficiencies (Response Required):

1). Benchsheets

- a) The time sampled and analyzed on the outfall 016A computer log for pH analyses are listed under a column labeled "TIME". Personnel should change their benchsheets to clearly identify the 2 times.

This comment was regarding the computer based spreadsheet that is used to track information from the continuous chart recorder. An indication that the time sampled and time analyzed are the same has been noted by lab personnel, as of 9/19/07, on the spreadsheet, as requested.

- b) Personnel do not record the effluent temperature at the time of pH analyses. Because pH is affected by temperature the approved analytical methods require temperature to be measured and recorded. This information must be added to your records.

High and low temperatures are noted and recorded in the logbook from the 24 hour chart recorder as of 9/13/07 by lab personnel.

- c) Personnel do not record all the required TSS analysis information – sample volumes, dry and final weights and percent differences – on their benchsheets. Personnel must begin recording all TSS information.
Lab benchsheets have been amended to include all information as requested as of 9/19/07 by lab personnel. Information has been added to the benchsheet. Please see TSS benchsheet (attachment).
- d) Personnel do not list the TSS formula used on their benchsheet. This information must be added to your benchsheets.
Please see TSS benchsheet (attachment).
- e) Personnel note that there should be less the 4% difference between the 2nd dry and final weights. Please note that this is also true for the 1st dry and final weights.
Information has been added to the TSS benchsheet. Please see attachment.
- f) Personnel listed the May 28, 2007 grab sample as also being sampled on May 29, 2007.
Clerical error; corrected with single line through and initials on 9/4/07.
- g) Personnel put their Oil & Grease calculations at the bottom of their benchsheets. Although the calculation are labeled 1,2,3, etc., the sample results listed at the top of the page are not. it is difficult to see which numbered calculation corresponds with which result.
Although samples are presently analyzed by a contract laboratory, plans are underway to obtain instrumentation compatible with EPA Method 1664a, therefore a revised benchsheet has been included for your review. Calculations will be designated by date and outfall number only as of 9/20/07.
- h) Personnel do not list the Oil & Grease formula on their benchsheet. This information must be added to your benchsheet.
Benchsheet has been amended to include this information as of 9/19/07. Please see attachment. Although samples are presently analyzed by a contract laboratory, plans are underway to obtain instrumentation compatible with EPA Method 1664a, therefore a revised benchsheet has been included for your review.
- i) The #3 June 8, 2007 sample calculations are not dated to differentiate them from the June 13, 2007 calculations next to them at the bottom of the benchsheet.
The datasheet has been corrected on 9/4/07 to differentiate the information. Future calculations will be designated by date and outfall number.
- j) Personnel list the June 13, 2007 Oil & Grease sample information on both the May and June 2007 benchsheets. The duplicate and sample results from this sample are then used for the duplicate results for the May 17, 24 and 28, 2007 analyses.
This had been done to indicate that all samples had been analyzed concurrently. Although samples are presently analyzed by a contract laboratory, plans are underway to obtain instrumentation compatible with EPA Method 1664a, therefore a revised benchsheet has been included for your review.

If you have any questions regarding this response, or require additional information please contact Ms. Felicia Giordano, PSNH Schiller Station, at 431-2550, extension 7349.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. P. Despina', with a long horizontal flourish extending to the right.

Richard P. Despina
Schiller Station Manager

Attachments

cc: Joy Hilton, USEPA-Region 1, Water Technical Unit
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