



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

August 21, 2007

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

AUG 23 2007

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

Dear Ms. Giordano:

On July 26, 2007, as a representative of the Department of Environmental Services, Water Division, Wastewater Engineering Bureau (DES), I conducted a NPDES CEI at Schiller Station. Objectives of a CEI include determining compliance with NPDES permit conditions, verifying accuracy of permit required information and adequacy of permittee sampling and monitoring. The following people were present during this CEI:

Felicia Giordano, Sr. Environmental Coordinator, Schiller Station
David Corliss, Working Foreman – Laboratory, Schiller Station
Harlen Tuttle, Sr. Chemical Operator, 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 from June 2006 through May 2007 (the months reviewed).

The deficiencies and observations/recommendations DES observed during the CEI are summarized as follows:

Deficiencies (Response Required):

1) Benchsheets

- a) The times 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.
- 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.
- 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.
- d) Personnel do not list the TSS formula used on their benchsheet. This information must be added to your benchsheets.

- 2) EPA has published new DMR Instructions for 2007. The instructions can be found on the EPA website at www.epa.gov/region1/enforcementandassistance/dmr.html.

Corrective Actions Required:

DES requests that 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/were 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 you submit your inspection response to DES by **September 21, 2007**. If DES does not receive a signed, complete response 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
Permits & Compliance Section
Wastewater Engineering Bureau

Enclosures: EPA Water Compliance Inspection Report Form 3560-3
DMR violations summary (June 2006 – May 2007)

Cc: John R. Bush, P.E., Administrator, DES
Margaret Bastien, P.E., Compliance Supervisor, DES
Joy Hilton, USEPA-Region 1, Water Technical Unit
DES/WWEB/File

Month	Parameter	Type	Units	Permit Limit	Result	# of violation	Reported properly?	Postmark date:	Comments	
2006	6	DMR					Yes	7/17/2006	no violations for outfalls 002A, 003A, 004A, 011A, 013A, 016A, 018A, 020A, 021A. No discharge for outfalls 022A, 019A, 017A, 015A, 006A, 001A. 7/17/06=Saturday.	
	7	Temperature	Daily Maximum	degrees F	95	97	1	Yes	8/14/2006	violation occurred when personnel were performing maintenance on the condensor to clean it of river debris. The discharge temperature climbed more quickly than anticipated due to the reduction in cooling water flow caused by the blockage and related maintenance work. There were no violations for outfalls 002A, 003A, 011A, 016A, 018A, 020A, 021A. No discharge for outfalls 022A, 019A, 017A, 015A, 013A, 006A, 001A.
	8	DMR					Yes	9/15/2006	No violations for outfalls 002A, 003A, 004A, 011A, 016A, 018A, 020A, 021. No discharge for outfalls 001A, 006A, 013A, 015A, 017A, 019A, 022A.	
	9	DMR					Yes	10/16/2006	no violations for outfalls 001A, 002A, 003A, 004A, 011A, 016A, 018A, 020A, 021A. No discharge for outfalls 022A, 019A, 017A, 015A, 013A, 006A.	
	10	DMR					Yes	11/15/2006	no violations for outfalls 002A, 003A, 004A, 011A, 016A, 018A, 020A, 021A. No discharge for outfalls 001A, 006A, 013A, 015A, 017A, 019A, 022A.	
	11	DMR					Yes	12/7/2006		
	12	DMR					Yes	1/16/2007	no discharge for outfalls 001A, 006A, 013A, 015A, 017A, 019A, 022A. No violations for outfalls 002A, 003A, 004A, 011A, 016A, 018A, 020A, 021A.	
2007	1	DMR					Yes	2/15/2007	no violations for outfalls 002A, 003A, 004A, 006A, 011A, 016A, 018A, 020A, 021A. No discharge for outfalls 001A, 013A, 015A, 017A, 019A, 022A.	
	2	DMR					Yes	3/15/2007	no violations for outfalls 002A, 003A, 004A, 011A, 016A, 018A, 020A, 021A. No discharge for outfalls 001A, 006A, 013A, 015A, 017A, 019A, 022A.	
	3	DMR					Yes	4/13/2007	no violations for outfalls 002A, 003A, 004A, 011A, 016A, 018A, 020A, 021A. No discharge from outfalls 001A, 006A, 013A, 015A, 017A, 019A, 022A.	
	4	DMR					Yes	5/15/2007	no violations for outfalls 002A, 003A, 004A, 011A, 013A, 016A, 018A, 020A, 021A. No discharge from outfalls 022A, 019A, 017A, 015A, 006A, 001A.	
	5	DMR					Yes		DES date-stamp 6/18/07. No violations for outfalls 002A, 003A, 004A, 011A, 016A, 018A, 020A, 021A. No discharge for outfalls 001A, 006A, 013A, 015A, 0117A, 019A, 022A.	