



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

July 31, 2008

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

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

Dear Ms. Giordano:

On July 29, 2008, as a representative of the New Hampshire Department of Environmental Services (DES) Wastewater Engineering Bureau, I conducted a National Pollutant Discharge Elimination System (NPDES) Compliance Evaluation Inspection (CEI) at the PSNH Schiller Station (PSNH). Objectives of the CEI included determining compliance with NPDES permit conditions, verifying the accuracy of permit required information, and verifying the 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
Thomas J. Croteau, Environmental Inspector, DES

Please find attached to this cover letter a copy of EPA's Water Compliance Inspection Report.

DEFICIENCIES: (response required)

During the inspection the following deficiency was noted:

PSNH has not been completing the DMRs correctly per the EPA's instructions. A copy of DES's Track 2000 Database Monthly Compliance Report was provided and reviewed with the facility. Specifically, the December 2007 DMR did not specify the flow units. More attention should be exercised since PSNH is certifying that the DMR information is **true, accurate and complete**. Upon DES's request, an amended DMR was received on July 29, 2008.

CORRECTIVE ACTIONS REQUIRED:

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 has 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.

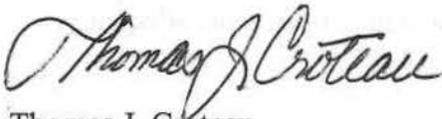
DES requests that PSNH submit its response to this inspection by **September 5, 2008**. If DES does not receive a signed, complete response within the allowed time frame, DES may proceed with an appropriate enforcement action.

Please mail your inspection response to:

Thomas J. Croteau
NHDES/WD-WWEB
P.O. Box 95
Concord, NH 03302-0095

If you have any questions, please call me at 271-2985.

Sincerely,



Thomas J. Croteau
Environmental Inspector
Compliance Section
Wastewater Engineering Bureau

cc: DES, WD, WWEB/File
Paul L. Heirtzler, P.E., Esq., Administrator, WWEB
Tracy Wood, P.E., Compliance Engineer, WWEB
Joy Hilton, USEPA Water Technical Unit

Attachments: EPA Form 3560 – Water Compliance Inspection Report

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

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 - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (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., 04/10/01 = October 01, 2004).

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

A	Performance Audit	U	IU Inspection with Pretreatment Audit	I	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	[Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling]	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	\$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	^	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

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

A	State (Contractor)	O	Other Inspectors, Federal/EPA, (Specify in Remarks columns)
B	EPA (Contractor)	Q	Other Inspectors, State (Specify in Remarks columns)
C	Corps of Engineers	R	EPA Regional Inspector
J	Joint EPA/State Inspectors—EPA Lead	S	State Inspector
Y	Local Health Department (State)	T	Joint State/EPA Inspectors—State lead
N	NEIC Inspectors		

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 followup 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, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

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.

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.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.