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November 12, 1991

Dennis R. Brown, Director
Public Service Co. of New Hampshire
1000 Elm St., P.O. Box 330
Manchester, NH 03105

Subject: NPDES Permit No. NH0001473

Dear Mr. Brown:



Representatives of the Department of Environmental Services performed a Compliance Evaluation Inspection at PSNH - Schiller Station on April 23 and May 24, 1991. The following letter is a report of that inspection and will be forwarded to the Environmental Protection Agency with EPA form 3560-3.

Individuals present during the inspection were:

- Nelson Goodwin - Station Chemical Supervisor
- Kenneth Fisher - Working Foreman Chemical
- Allan G. Palmer - Senior Engineer
- Stephanie Larson - Environmental Inspector, NHDES
- Carroll M. Brown, Jr. - Environmental Inspector, NHDES

The inspection consisted of a tour of the wastewater treatment plant and a visual inspection of all outfalls. Laboratory procedures, analytical methods, and all records and reports relative to the NPDES permit were reviewed. No sampling was conducted.

Treatment plant personnel have spent considerable time in developing the monitoring program for this facility, and a great deal of improvement was noted since the last inspection. The following are items that were discussed at the inspection, including comments and recommendations:

Laboratory

1. There is no thermometer in the refrigerator at the treatment plant and the temperature of this unit could not be verified by facility personnel. This refrigerator should be kept at 4°C to ensure that composite samples are maintained at the temperature required by 40 CFR 136. An accurate thermometer should be placed in this unit as soon as possible.

2. Currently, the duplicate for TSS is chosen by taking the highest result out of the 2 tests conducted. The duplicate should be chosen and the container should be labelled as such prior to conducting the test, not after.

Flow Measurement

1. Flow measurement checks are not performed by the facility.
 - Treatment plant personnel should manually perform instantaneous flow measurement checks at the effluent weir to assure that the chart, readout, and totalizer remain accurate between annual professional calibrations. These checks should be performed every two weeks and recorded in your log books.
2. The actual measured head of the effluent flow was checked against the totalizer and the chart & pen. The acceptable amount of error allowed is +/- 10% from the actual known flow and both units were found to be reading .32% above than the effluent flow.

Discharge Monitoring Reports

1. The monthly Discharge Monitoring Reports (DMR) are not always being completed correctly. They contain spaces to record the EPA computer compatible codes for units, number of exceedances, sample type, and frequency of analysis. These "boxes" have not always been filled in by the person completing the DMR. Directions for completing these forms can be found in the "Example DMR Calculations" mailed to your facility in February 1991.

Quality Control

1. Quality control(QC) tests(duplicates, standards, blanks, and spikes) must be performed in accordance with the NHDES Wastewater Laboratory Quality Assurance Program Guidelines. For each analysis the following tests must be run:
 - one Quality Control standard
 - one sample duplicate
 - one blank
- The above-referenced procedures must be instituted as soon as possible.
- Although a laboratory QA/QC plan has been developed, it is lacking in detail and does not adequately address many of the tests done at the facility. It is my understanding that this will soon be corrected; a review of the complete plan will take place during your next Compliance Inspection.



NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

JK 12/11

Section A: National Data System Coding

Transaction Code: 1 N 2 5 NPDES: 3 N H 00 01 47 3 11 yr/mo/day: 12 9 1 0 4 2 3 17 Inspection Type: 18 C Inspector: 19 S Fac Type: 20 2

Remarks

21 Reserved: 67 69 Facility Evaluation Rating: 70 2 BI: 71 N OA: 72 N Reserved: 73 74 75 80 66

Section B: Facility Data

Name and Location of Facility Inspected PSNH-Schiller Station Gosling Road Portsmouth, NH		Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 9:45	Permit Effective Date 12/12/90
		Exit Time/Date 3:45 91/04/23	Permit Expiration Date 12/12/95
Name(s) of On-Site Representative(s) Allan Palmer Nelson Goodwin Kenneth Fisher		Title(s) Sr. Engineer Sta. Chem. Supervisor Working Foreman Chemical	Phone No(s) (603) 669-4000
Name, Address of Responsible Official Dennis Brown PSNH, P.O. Box 300 Manchester, NH		Title Director, Production Division	Phone No. (603) 669-4000
		Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	N	Pretreatment	S	Operations & Maintenance
S/S	Records/Reports	M	Laboratory	N	Compliance Schedules	N	Sludge Disposal
M	Facility Site Review	S/S	Effluent/Receiving Waters	M	Self-Monitoring Program	U	Other: QA/QC

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

The Facility Evaluation Rating of "2" is due primarily to:
 1) the lack of a written Quality Assurance plan
 2) the lack of complete implementation of QC tests in the laboratory.
 It is expected that the facility should be able to attain a rating of "3" or better when this has been satisfactorily completed.

The FACILITY EVALUATION RATING reflects only the Self-Monitoring Program, and not the overall facility performance.

Name(s) and Signature(s) of Inspector(s) <i>Stephanie Larson</i> Stephanie Larson	Agency/Office/Telephone NHDES (603) 271-2457	Date 11/12/91
<i>Carroll Brown</i> Carroll Brown	NHDES (603) 271-2457	11/8/91
Signature of Reviewer <i>Jeffrey A. Anderson</i>	Agency/Office NHDES	Date 11/13/91
Regulatory Office Use Only		
Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance

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. (*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., 82/06/30 = June 30, 1982).

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

A — Performance Audit	E — Corps of Engrs Inspection	S — Compliance Sampling
B — Biomonitoring	L — Enforcement Case Support	X — Toxic Sampling
C — Compliance Evaluation	P — Pretreatment	
D — Diagnostic	R — Reconnaissance Inspection	

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

C — Contractor or Other Inspectors (<i>Specify in Remarks columns</i>)	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 1972 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1972 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.

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

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.

Section C: Areas Evaluated During Inspection

Indicate findings (S, M, U, or N) in 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 "Other" may include activities such as SPCC, BMP's, and multimedia concerns.

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.