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Public Service of New Hampshire

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The Northeast Utilities System

October 26, 2005

Ms. Sharon Zaya
Massachusetts Office of Ecosystem Protection
U.S. Environmental Protection Agency
Region 1: New England
One Congress Street, Mail Code CIP
Boston, MA 02114-2023

Subject: Schiller Station, NPDES NH0001473

Dear Sharon,

As discussed at the end of our meeting last month, I've enclosed plans which show the modifications being undertaken in the main coal yard at Schiller Station. The project became necessary to meet our minimum coal storage requirements when the station lost the 120,000 square feet of capacity in the reserve coal storage yard to the wood conversion project. This construction will reclaim an open drainage swale along the west side of the main yard to replace 23,000 square feet of storage capacity. The roughly 40-foot wide slice of yard will be supported along the existing roadway with a retaining wall and the working area will be paved with concrete. The new sloped surface will direct runoff to the existing coal yard drainage system which is treated in the wastewater facility. All permits have been acquired and we are only waiting for the building permit to be processed by the local planning board.

The project results in a significant reduction of NPDES-related wastewater flows. The total coal storage area is being reduced by nearly 100,000 square feet and coal pile runoff will no longer be generated in the reserve yard. Engineers reviewed the drainage requirements within the new coal yard and calculated a volume of 287,000 gallons of runoff from a 10-year storm event. The capacity of the existing holding basin is 324,000 gallons, providing for more than a 10-percent buffer. The Drainage Review Report is enclosed. It is also important to note that the holding basin is equipped with two pumps of 100 gpm capacity to transfer the influent to either the wastewater facility or a treatment basin. While the volume of wastewater is being reduced considerably, the characteristics of the runoff will obviously remain unchanged.

All other NPDES-related functions will also remain the same. As mentioned earlier, the coal pile runoff is treated in the wastewater facility so it will continue to be monitored and reported as part of Outfall 016. The drainage swale that is being reclaimed conveyed much of the storm water runoff that discharges via Outfall 018. This runoff will also be significantly reduced when the swale is replaced by only the underdrainage line beneath the new paved area. We will continue to monitor the outfall, estimate the flow and report data in the same manner. While it will be difficult to operate the station with the single coal yard, wastewater flows are reduced and operations are simplified.

As I also mentioned at the meeting, PSNH is in the midst of compiling the documentation necessary to transfer all storm water outfalls at Schiller Station from the existing individual permit to coverage under the Multi-Sector General Permit. This activity is in keeping with guidance provided by EPA's Thelma Murphy. A revised individual permit application will be submitted at that time to propose the removal of the storm water outfalls, as well as reflect this reduction in coal pile runoff.

Please contact me at 603-634-2439 if you have any questions.

Very truly yours,

Allan Palmer
Senior Engineer

cc: Jeffrey Andrews, NHDES