



**Northeast  
Utilities System**

Public Service Company of New Hampshire  
Schiller Station  
400 Gosling Road  
Portsmouth, NH 03801  
(603) 431-2550

D28359

October 9, 2009

Ms. Stephanie Larson  
NHDES/WD-WWEB  
P.O. Box 95  
Concord, NH 03302-0095

Subject: National Pollution Discharge Elimination System  
Compliance Evaluation Inspection (CEI)  
PSNH – Schiller Station  
NPDES Permit Number NH0001473

Dear Ms. Larson:

Public Service Company of New Hampshire hereby submits this letter in response to a deficiency noted during the CEI that took place on September 16, 2009, and, in your letter dated September 25, 2009 which stated:

Deficiencies (Response Required)

1) Proper Operation and Maintenance

a) Part II, Section B.1. of the NPDES permit requires the permittee at all times to properly operate and maintain all facilities and systems of treatment and control which are installed or used to achieve compliance with the permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance (QA) procedures. PSNH – Schiller Station personnel do not always correct laboratory benchsheet results correctly. Personnel sometimes write over or cross out results. Writing over and/or crossing out results to correct benchsheet errors is not a proper QA procedure. Errors should be corrected by drawing a line through the incorrect value(s), writing the correct value next to it and then initialing the correction. PSNH – Schiller Station must ensure that all personnel know the correct procedure for correcting benchsheet errors. DES requests that PSNH – Schiller Station describe all steps taken to correct the deficiencies identified by the inspector, that include the dates the deficiencies were corrected or the anticipated corrections date.

On September 17, 2009, subsequent to the CEI, PSNH – Schiller Station required that all laboratory personnel review and understand the NPDES Permit Program Instructions for the Discharge Monitoring Report Forms (DMRs) Report Year 2009, which states that, "To correct an error in reporting data on the DMR, or if you need to make a change due to an error in reporting, cross out the value(s), reenter the correct value, initial the field/box." Additionally, a notation of the rule has been added to the Schiller Station NPDES QAQC manual, Section 2.0 Testing Procedures: Bench Work Sheets.

If you have any questions, or need additional information, please do not hesitate to contact me directly at 603-431-2550 ext. 7349.

Very truly yours,

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE

Felicia Giordano  
Senior Environmental Coordinator

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