

**RESPONSE TO COMMENTS
REISSUANCE OF NH0001473
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
SCHILLER STATION**

During the period, July 3, 1990 to August 1, 1990, EPA and the New Hampshire Department of Environmental Services solicited public comments on the draft National Pollutant Discharge Elimination System (NPDES) permit to be issued to the Public Service Company of New Hampshire - Schiller Station for the discharge of once through cooling water, treated operational plant wastewater, process water, and coal pile runoff to the Piscataqua River in Portsmouth New Hampshire. Comments were received from PSNH - Schiller Station. Following is a response to comments received during the public notice period, including identification and explanation of those provisions of the draft permit which have changed in the final permit.

Comment 1

Oil and grease samples are collected on a monthly basis for Outfalls 001, 011, and 018. The permit contains two limits which causes confusion when only one value is recorded each month. Public Service on New Hampshire (PSNH) requests the average monthly limit be eliminated and have a daily maximum limit only.

Response

Federal regulations at 40 CFR 122.44(1) stipulate that the limitations of a reissued NPDES permit cannot be less stringent than those of the previously issued permit, except in certain circumstances which do not apply in this case.

Comment 2

PSNH requests that the discharge monitoring report (DMR) submittal deadline for reports be the 28th of each month as required by their existing permit. Additional time is needed to compile the large amounts of data associated with an 18-outfall facility.

Response

Due to requirements by the Water Supply & Pollution Control Division of the New Hampshire Department of Environmental Services, the discharge monitoring report date can be no later than the 15th day of the month following the completed monitoring period. That date has been included in the final permit.

Comment 3

PSNH requests that an emergency temperature provision be granted for Outfalls 002, 003 and 004 to allow less restricted operation during New England power deficiencies. The request is made to lessen the risk of voltage reductions or brownouts during periods of high electrical power demand, usually triggered by extreme weather conditions.

Response

The upper temperature and change of temperature limits are water quality-based and unlike technology-based limits cannot be changed. These limits are "grandfathered" in that their basis was no prior harm to aquatic life at these elevated thermal conditions. EPA biologists have allowed upper temperature limits of 90° to 95° F with few exceptions. Ninety-five (95) degrees F is almost universally accepted amongst biologists as the upper thermal limit that will not adversely impact aquatic life.

Even though the violation can be justified and it will be of a short duration causing no observable harm to the waterway, the EPA can not authorize, through a permit caveat, a violation of an effluent limit.

The permittee can in the likelihood of a thermal excursion, report to the EPA Regional Administrator, the State Director, and the Executive Director of the New Hampshire Fish and Game Department the following information:

- 1) When the thermal excursion is expected
- 2) The expected duration of the thermal excursion
- 3) Monitoring results of impacts on aquatic life, especially any fish kills
- 4) If fish kills occur, the permittee shall operate the facility within the approved permit conditions and report to the Administrator, Director, and Executive Director.

NOTE:

Subsequent to the public notice period, the EPA and the State are requesting that the permittee take two samples from the wastewater treatment facility. The first sample shall be taken within 60 days after the effective date of the final permit. The second sample shall be taken during the first metal cleaning operation after the effective date of the permit. Both samples shall be analyzed for all heavy metals identified in Appendix D, Table III of 40 CFR 122.21 with the exception of cyanide and phenol.

An additional paragraph has been added to the permit, prohibiting the discharge of tank water draws to the Piscataqua River without treatment. In the past, some tank water draws have shown significant toxicity.