

STATE OF NEW HAMPSHIRE

Inter-Department Communication

M4001465

DATE June 18, 1997

FROM: Kendall L. Perkins, Environmental Inspector **(AT OFFICE)** Water Division
Surface Water Quality Bureau (SWQB)

SUBJECT: Inspector's response to letter from R.G. Chevalier, Vice President of Northeast Utilities Service Company (June 9, 1997) regarding Compliance Inspection Report by Kendall Perkins (March 25, 1996)

TO: Douglas H. Starr, P.E., Compliance Supervisor, SWQB
PSNH-Merrimack Station File

On February 21, 1997 I conducted a NPDES Compliance Inspection at Public Service of New Hampshire (PSNH) Merrimack Station (MS). Pursuant to the inspection I sent a Inspection letter to R.G. Chevalier, Vice President of Northeast Utilities, on March 25, 1997. Mr. Chevalier responded to my inspection letter with a letter to Douglas Starr. I intend to address specific items of Mr. Chevalier's letter with this Memorandum.

1 - First, I will address pH monitoring and reporting at PSNH-MS. The PSNH-MS Permit required frequency of analysis for pH at 003A is continuous. However, PSNH-MS monitors 003A pH at a frequency of 96 readings a day. Historically this monitoring effort has sufficed in lieu of continuous monitoring. We should also consider that any monitoring effort which includes less than 96 pH data points per day should constitute a monitoring frequency violation.

Reference is made to the section of R.G. Chevalier's response letter titled Reporting of Biomonitoring pH Data in which he "objects to the statement that erroneous data which falls outside the permitted range should be reported as violations." As evidenced by my attached report, I never made that statement. I did write, "If erroneous reading cause permit exceedances then PSNH-MS shall explain these in accordance with Part II, 2, D, 1, f of the Permit." I do wish to clarify this verbiage. The intent of this sentence is better understood as: **If erroneous readings cause monitoring frequency violations then PSNH-MS shall fully explain the circumstances behind the erroneous readings.** An appropriate explanation would be one that meets the reporting requirements of Part II, 2, D, 1, f of the Permit.

PSNH-MS personnel are editing the pH data to omit "erroneous readings" from the DMRs. PSNH-MS should only omit pH data when there is a well defined, proven, equipment