

AB-010



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June 13, 1990

Nicholas W. Prodany
CT-ME-NH Wastewater Management Section
U.S. Environmental Protection Agency
WMC 2113
J.F.K. Federal Building
Boston, MA 02203



Subject: PSNH Schiller, NPDES Permit No. NH0001473

Dear Mr. Prodany:

As promised, here are our comments on the 14-day draft permit for Schiller Station. Thanks for sending me the information on the low flow. Our comments are as follows:

GENERAL

- We recommend that the permit be written to include all stormwater outfalls. This will eliminate the possible need for EPA and New Hampshire to modify the permit after the new stormwater rules are promulgated.
- The low flow used for the Piscataqua was derived using the average tidal prism of 2.3×10^9 ft³. Shouldn't the low flow be derived using a minimum tidal prism? New Hampshire water quality standards requires that for marine/estuarine discharges that the flow that is exceeded 99% of the time be used.
- New Hampshire has the capability to screen discharges to freshwater (but not saltwater) for acute and chronic toxicity. Since acute toxicity may be present in the mixing zone, we recommend that monitoring be required on outfalls 016 and 017 for two marine species for one year (total of 4 samples). A reopener clause should be put in the permit to allow EPA and the state to impose limits if necessary. Note that our present draft of the water

quality standards regulations requires that for >100:1 dilution, the whole effluent have ≤ 2.0 T.U.a or $LC50 \geq 50\%$.

FACT SHEET

- Att. A - Missing outfalls 015,019,020,021 and 022
- Att. A - Outfall 005 (stormwater) is included here but not in the permit.
- p. 2 - Paragraph 3, the coliform limit for tidal class B waters is 70 org/100 ml (MPN basis)..
- p. 4 - There is a discharge from outfall 006 whenever the old wastewater treatment facility (outfall 015) operates or whenever the new WWTF (outfall 016) is off line since there is no way to return boiler blowdown.
- p.6 - In last paragraph before item V should 316(a) read 316(b)?

DRAFT PERMIT

- p. 1 - DEP should read DES at bottom.
- p. 6,8 through 16 and 19 - To be consistent with previous New Hampshire permits the pH footnotes should read:

"The pH shall not be less than 6.5 standard units (S.U.) nor greater than 8.0 S.U. unless due to naturally occurring conditions in the intake. The pH shall be within 0.5 S.U. of the intake when the pH is outside the above range. Intake pH shall be monitored when the discharge is monitored and shall be reported in the discharge monitoring report."

Note that for stormwater outfalls the word "intake" should be replaced with the word "rainfall."
- p. 7 - Why is the monthly average flow lower than the daily max. here when the two are the same on outfalls 003 and 004?

- On p. V-1 of the application the maximum reported flow is 41.8 MGD. Why is the limit (52.2 MGD) so much higher here?
- p.9,10 - As above, why is the max. day limit so much higher than that reported in the application?
- p.6,8,9 - For flow measurement, the sample type should read
& 10 "calculated" and a footnote should require the continuous recording of the time of operation of the pumps.
- p. 12 - Delete "daily average and " from the pH footnote (see above comment on pH).

- p. 15 - Why does this say groundwater discharge when the application says it contains stormwater and oil tank heater drains?
- p. 17,18- pH monitoring should be required continuously for the WWTF (it already exists).
- p. 17 - Does the application data (012A) reflect a normal or chemical cleaning discharge or both? If not both (or worst case) PSNH should be required to collect and submit the appropriate data and the permit should be reopened if necessary.
- p. 15,19- Where do the tank bottoms for the Newington and Schiller station yard drains go? Concern is with soluble PAHs.
- p. 20 - In Item C. please repeat the sentence on land disposal of screenings that was included on page 2. (Part IA.1.C.).
- d. add "or as naturally occurs".
- p. 21 - Please add the Executive Director of the New Hampshire Fish & Game Department to the list of persons to be notified of any unusual fish entrapment episodes.
- p. 22 - Please add "Permits and Compliance Section" under NHDES.

June 1, 1990 PSNH Letter

Relative to requested revisions noted in the attachment to the June 1, 1990 letter we offer the following:

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| p. 1 Outfalls 001,002,003,004 | Item 1 OK, item 2 OK, item 3 No, PSNH should only chlorinate when sampling is conducted. |
| p. 1 Outfalls 001,011,018, | No, antibacksliding would not allow this. |
| p. 1 Outfall 006 | OK, but only if PSNH proves that the continuous blowdown station is representative of all of the discharges. |
| p. 2 Outfall 011 | No, if sampling conditions are hazardous, PSNH should collect a composite sample from all 3 pipes (if the required analyses allows this). Otherwise all 3 pipes should be sampled. |
| p. 2 Outfalls 011,013,018 | OK |

p. 2 DMR Submittal Date

No. Other permittees with much more complicated monitoring requirements are able to meet the 15th of the month deadline.

p.2,3 Temperature Limitations

Possibly, but not without more information on the impact this will have on the river temperatures and the biological community.

Before we certify the public notice draft of the permit, we ask that you send us a written response to the above comments and concerns. Please also send us copies of any public comments received and your draft response to any significant ones.

If you have any questions relative to this letter, do not hesitate to call me at (603) 271-2457.

Very truly yours,



Jeffrey G. Andrews, P.E., Supervisor
Industrial Permits Section

JGA/cd

cc: William Beckwith
Richard Flanders

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