Ralph C
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PSNH

Earl G. Legacy
Vice President

AR-012

Public Service of New Hampshire

June 1, 1990

Mr. Edward K. McSweeney, Chief
Wastewater Management Branch
U. S. Environmental Protection Agency
J. F. Kennedy Federal Building
Boston, Massachusetts 02203

RE: NPDES Draft Permit No. NH0001473

Dear Mr. McSweeney:

Public Service Company of New Hampshire has reviewed the draft permit for Schiller Station and we are in general agreement with the limitations and requirements. We do, however, have several comments to offer. A copy of the draft permit has been marked up and is enclosed for your consideration. The most substantive comments are discussed in a separate attachment. PSNH compliments the permit writer on creating a reasonable and thorough draft permit.

As previously requested, PSNH has sampled and analyzed stormwater discharges for this facility. The information is being compiled and will be submitted within 30 days.

We appreciate the opportunity to comment on this draft permit. Please contact Allan G. Palmer at (603) 669-4000, extention 2439, if you have any questions.

Very truly yours,

Earl G. Legacy
Vice President

AGP/lm
AGP/7:6

cc: Nicholas Prodany - USEPA
Russell Nylander - NHWSPCD

Comments on Draft Permit No. NH0001473

Outfalls 001, 002, 003, 004

PSNH requests the following modifications to these 4 outfalls:

- Specify that the hourly temperature monitoring only be required when the generating units are on-line. This action could eliminate thousands of meaningless readings when the units are on standby, but the cooling water pumps are still operating. The important elevated temperature data that is generated when the units are on-line will continue to be collected.

- List the flow sample type as a calculated value to indicate that it is based on pump capacity curves and operating times.

- Limit total residual chlorine monitoring to only Monday through Friday to allow 7-day chlorination without requiring weekend duty of the chemists. The station plans to continue with 5-day chlorination, but would prefer the option to weekend treat without sampling if it should become necessary. The stroke on the transfer pumps is closely maintained to assure the proper dose rate and the chlorination cycle is automatically controlled to regulate the time duration. Historically, TRC compliance has been excellent.

Outfalls 001, 011, 018

PSNH requests the average monthly oil and grease limitation be eliminated since the sampling frequency is only monthly.

Outfall 006

PSNH proposes several minor clarifications to this 6-pipe outfall. Most importantly, we ask that the continuous blowdown station be specified as a representative sampling location. This will eliminate safety hazards associated with end-of-the-pipe sampling. The hazards include a dangerous river embankment and the release of pressurized steam at the outfall. The pH of the effluent, boiler condensate, is essentially identical throughout the system.

Outfall 011

This outfall is the culmination of 3 individual pipes that spill into a common earthen trench that eventually discharges via a stormwater culvert. PSNH requests the sampling point be identified as any one of the 3 pipes. This will also eliminate a hazardous sampling condition on the river bank while still providing a representative sample.

Outfalls 011, 013, 018

These 3 outfalls involve the discharge of stormwater from a contained area. Since the daily flows are partially based upon precipitation data, snow fall and icy conditions confuse the water balance accounting due to the retention time. EPA did not respond to our 1987 request for guidance regarding this issue. PSNH asks that the permit allow us the discretion to calculate the flows in a manner we determine to be reasonable.

DMR Submittal Date

EPA has previously granted PSNH the DMR submittal deadline of the 28th day of each month for Schiller Station. We request the retention of this allowance due to the large amount of data compilation associated with an 18-outfall facility.

Temperature Limitations

In our application, PSNH asked if temperature limit variances could possibly be granted for Outfalls 002, 003 and 004 during critical power generation periods. We suggested that it might be possible to link the variances to a New England Power Exchange (NEPEX) utility emergency response action termed Operating Procedure #4 (OP-4). EPA requested more information.

OP-4 is a formalized series of electric utility response actions that NEPEX implements when the New England region experiences an energy capacity deficiency. The actions are specifically defined and are generally applicable to all New England utilities simultaneously. The responses are usually triggered by extreme weather conditions but are also influenced by other factors such as large generating unit outages, including those outside of New England.

The first response action under OP-4 is to bring all of the steam generating units up to Maximum Claimed Capability (MCC). Temperature limitations are regularly approached by Schiller Station Units 4, 5, and 6 when they are operated at MCC. To avoid the conflict between responding to the regional power demand and the NPDES permit, PSNH requests the temperature limits be suspended during these brief emergency periods.

OP-4 implementation is typically infrequent and short-lived. In 1989, NEPEX called upon OP-4 less than 1% of the year. An unofficial summary of the last 7 years is provided here:

OP-4 Events

YEAR	NO. OF DAYS	NO. OF HRS.	% OF YR.
1983	0	0	0.0
1984	13	50	0.6
1985	7	30	0.3
1986	32	112	1.3
1987	24	119	1.4
1988	34	181	2.1
1989	21	71	0.8

Due to new generation, New England is predicted to have a larger surplus of power from 1990 through 1994 than it had in 1989. By 1995, the region is expected to face a similar supply and demand situation as in 1989. Consequently, OP-4 should be in effect less than 1% of the entire life of the permit. Additionally, it is possible that Schiller Station units could be out of service during OP-4 events or that temperature compliance could still be achieved when operating at MCC. This reduces even further the frequency that the variance will be needed. It will, however, allow the generation of valuable power during critical supply periods.

PSNH understands that this may be a procedure that is unfamiliar to EPA. More details are available if desired; perhaps we can discuss the concept further and the possible means to implement the variance and to document it. Special reporting or possibly a trial program could be arranged.