



PECO ENERGY

PECO Energy Company
2301 Market Street
PO Box 8699
Philadelphia, PA 19103-8699
215 841 4000

March 17, 1994

Mr. Sohan Garg
Department of Environmental Resources
Suite 6010, Lee Park
555 North Lane
Conshohocken, PA 19428

Dear Mr. Garg:

Subject: Limerick Generating Station NPDES Permit No. PA0051926

Pursuant to Chapter 92.7, "Reporting of New or Increased Discharges," we are requesting the subject permit be amended to allow the use of Betz FoamTrol 144A as a replacement for Betz FoamTrol CT. The anti-foaming agent products are inherently the same materials with only slight differences in formulation. We are requesting that the current FoamTrol CT usage rate of 700 lb/day be approved for the FoamTrol 144A.

The FoamTrol CT uses a mineral oil carrier that contains undesirable dioxin precursors (up to 50 ppb). For this reason, Betz is phasing out the FoamTrol CT and replacing it with FoamTrol 144A. The FoamTrol 144A contains approximately 5% fatty acid, 8% fatty ester, 10% poly glycol, and 77% oil (non-dioxin carrier). Attached are the aquatic toxicity data and MSDS information for the FoamTrol 144A.

A copy of this letter (including any attachments or enclosures) is being sent to the U.S. Nuclear Regulatory Commission (USNRC) in accordance with the Limerick Generating Station, Units 1 and 2, Environmental Protection Plan, Section 3.2, which stipulates that USNRC shall receive a copy of any proposed changes to the NPDES permit at the same time that the permitting agency is notified.

Since the replacement of FoamTrol CT with the FoamTrol 144A will result in a significant benefit to the environment and since Betz is phasing out the FoamTrol CT, your prompt attention in this matter would be greatly appreciated. If you have any questions or require additional information, please contact me at (215) 841-5177.

Sincerely,

Robert M. Matty, Jr.
Engineer
Environmental Affairs

Attachment

cc: U.S. Nuclear Regulatory Commission, Document Control Desk
(Docket Nos. 50-352 and 50-353 & License Nos. NPF-39 and NPF-85)
T. T. Martin, Administrator, USNRC, Region 1
N. S. Perry, USNRC Senior Resident Inspector, LGS

9403230319 940317
PDR ADOCK 05000352
PDR

COOL

BETZ LABORATORIES
4636 SOMERTON ROAD , TREVOSE, PA 19053

PRODUCT: FOAM-TROL 144A

AQUATIC TOXICOLOGY

Fathead Minnow

96 Hour Static Renewal Bioassay

LC50: 51 MG/L

No effect level: <38 MG/L

Daphnia magna

48 Hour Static Renewal Bioassay

LC50: 8.1 MG/L

No effect level: 3.12 MG/L

MAMMALIAN TOXICOLOGY

NO DATA AVAILABLE

BETZ LABORATORIES, INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19053
BETZ MATERIAL SAFETY DATA SHEET
EMERGENCY TELEPHONE (HEALTH/ACCIDENT) 800-877-1940

(PAGE 1 OF 3)
EFFECTIVE DATE 04-20-92
PRINTED: 20-Apr-1992

PRODUCT : FOAM-TROL 144A

REVISIONS TO SECTIONS: 1

PRODUCT APPLICATION : ANTIFOAM.

-----SECTION 1-----HAZARDOUS INGREDIENTS-----
INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC
PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD IS
LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE
AND CHRONIC HAZARDS OF THIS FORMULATION.

DISTILLATES (PETROLEUM), SOLVENT-REFINED AND/OR SEVERELY HYDROTREATED
PARAFFINIC***CAS#NOT APPLICABLE;POTENTIAL IRRITANT;PEL/TLV:5 MG/M3(OIL
MIST)
ALCOHOLS,C10-16***CAS#67762-41-8;EYE IRRITANT;MAY CAUSE DEFATTING-TYPE
DERMATITIS;PEL/TLV:NONE.

-----SECTION 2-----TYPICAL PHYSICAL DATA-----

PH: 5% EMULSION (APPROX.)	5.5	ODOR: SLIGHT HYDROCARBON
FL.PT.(DEG.F): >200 P-M(CC)		SP.GR.(70F)OR DENSITY: 0.875
VAPOR PRESSURE(mmHG): <5		VAPOR DENSITY(AIR=1): >1
VISC cps70F: 54		%SOLUBILITY(WATER): 0
EVAP.RATE: ND WATER=1		APPEARANCE: COLORLESS TO YELLOW
PHYSICAL STATE: LIQUID		FREEZE POINT(DEG.F): 60

-----SECTION 3-----REACTIVITY DATA-----

STABLE.MAY REACT WITH STRONG OXIDIZERS.DO NOT CONTAMINATE.BETZ TANK
CLEAN-OUT CATEGORY 'B'

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

BETZ MATERIAL SAFETY DATA SHEET (PAGE 2 OF 3)

PRODUCT: FOAM-TROL 144A

-----SECTION 4-----HEALTH HAZARD EFFECTS-----

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE

SLIGHTLY IRRITATING TO THE SKIN. MAY CAUSE DERMATITIS.

ACUTE EYE EFFECTS ***

MODERATELY IRRITATING TO THE EYES

ACUTE RESPIRATORY EFFECTS ***

MISTS/AEROSOLS MAY CAUSE IRRITATION TO UPPER RESPIRATORY TRACT

CHRONIC EFFECTS OF OVEREXPOSURE***

PROLONGED OR REPEATED EXPOSURES MAY CAUSE DEFATTING-TYPE DERMATITIS.

MEDICAL CONDITIONS AGGRAVATED ***

NOT KNOWN

SYMPTOMS OF EXPOSURE ***

MAY CAUSE REDNESS OR ITCHING OF SKIN.

-----SECTION 5-----FIRST AID INSTRUCTIONS-----

SKIN CONTACT***

REMOVE CONTAMINATED CLOTHING. WASH EXPOSED AREA WITH A LARGE QUANTITY OF SOAP SOLUTION OR WATER FOR 15 MINUTES

EYE CONTACT***

IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES. IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

INHALATION EXPOSURE***

REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR. APPLY APPROPRIATE FIRST AID TREATMENT AS NECESSARY

INGESTION***

DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DO NOT INDUCE VOMITING. IMMEDIATELY CONTACT PHYSICIAN. DILUTE CONTENTS OF STOMACH USING 3-4 GLASSES MILK OR WATER

-----SECTION 6-----SPILL, DISPOSAL AND FIRE INSTRUCTIONS-----

SPILL INSTRUCTIONS***

VENTILATE AREA, USE SPECIFIED PROTECTIVE EQUIPMENT. CONTAIN AND ABSORB ON ABSORBENT MATERIAL. PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL, OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
FLUSH AREA WITH WATER. WET AREA MAY BE SLIPPERY. SPREAD SAND/GRIT.

DISPOSAL INSTRUCTIONS***

WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT PRODUCT (AS IS) -

INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***

FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS (FULL FACE-PIECE TYPE). PROPER FIRE EXTINGUISHING MEDIA: DRY CHEMICAL/CO₂/FOAM OR WATER. SLIPPERY CONDITION. USE SAND/GRIT