

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION
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M. J. MCCORMICK, JR., P.E.
PLANT MANAGER
LIMERICK GENERATING STATION

November 29, 1990

Mr. Robert Bauer, Jr.
Department of Environmental Resources
Bureau of Water Quality Management
1875 New Hope Street
Norristown, PA 19401

Subject: Noncompliance with NPDES Permit
Limerick Generating Station
NPDES Permit No. PA-0051926

Dear Mr. Bauer:

DESCRIPTION OF NONCOMPLIANCE

On October 3, 1990, a routine weekly Discharge 001 sample was collected and sent to the Corporate Chemistry Lab to be analyzed for oil and grease. Station personnel received the analysis result on November 13, 1990. The sample result was 43.7 mg/l which exceeded the instantaneous maximum permit limit of 30 mg/l for oil and grease in Discharge 001. The remainder of the oil and grease samples from Discharge 001 for the month of October were well below the limit, and therefore, the monthly average permit limit of 15 mg/l was not exceeded.

CAUSE OF THE NONCOMPLIANCE

The sample result of 43.7 mg/l is an abnormally high reading for Discharge 001. The normal sample results are typically in the range of 0.8 to 1.6 mg/l. Following further investigation, we believe the sample taken on October 3, 1990, was not representative of the 001 Discharge flow. The sample taken contained silt that had a high oil and grease content. Visual examination of the silt that was flushed from the piping of one of the 001 Discharge sample pumps indicated that the material was primarily coagulated solids with oil and grease, which is indicative of the settled sludge found in the Holding Pond.

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The discharge pipe from the Holding Pond connects into the 001 Discharge line approximately 25 feet upstream of where the 001 Discharge sample pumps draw their suction. On October 3, 1990, when the sample was taken, it is believed that some of the accumulated silt dislodged from the sample piping and was collected in the sample. The effluents to the 001 Discharge line other than the Holding Pond do not contain oil and grease, so therefore, the potential source of the oil and grease is the Holding Pond. When the 001 sample was collected a separate sample was also taken from the 201 Discharge line because there was a discharge from the Holding Pond in progress. The sample from the Holding Pond discharge contained 2.8 mg/l oil and grease. Therefore, we have concluded that the sample was not representative of the actual flow out Discharge 001 and believe that the 001 flow was below the limit for oil and grease. However, we recognize that the source of the oil and grease is the Holding Pond and are taking corrective actions. The cause of the oil and grease that was discharged from the Holding Pond was the same as reported in our previous NPDES Noncompliance Letter dated October 26, 1990.

DURATION OF THE NONCOMPLIANCE

For the reasons stated above we do not believe that an actual noncompliance occurred. Recent Holding Pond problems caused the Discharge 001 sample system to accumulate solids fouled with oil and grease, thereby causing the sample result to be unrepresentatively high. The concentration of this material in our 001 Discharge was not believed to be great enough to have caused an actual violation of our oil and grease permit limits for that discharge.

CORRECTIVE ACTION

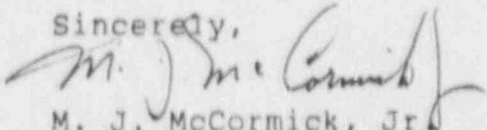
In addition to the corrective actions described in our NPDES Noncompliance Letter dated October 26, 1990, the Discharge 001 sample piping is routinely flushed daily and after the weekly 001 sampling is performed. Ongoing discussions with the Corporate Chemistry Lab are continuing in order to remedy the problem of untimely notifications of noncompliance.

PREVENTION OF FUTURE OCCURRENCES

A contractor has been procured to remove the sludge from the Holding Pond and Waste Water Settling Basin. The contractor has begun to remove sludge from the Holding Pond and has been informed that this facility must have first priority for his sludge removal and cleaning operation. System Engineers are continuing to investigate the best method for determining the sludge levels so that future cleaning of the Holding Pond and Waste Water Settling Basin can be initiated to avoid future noncompliance.

The revision of plant training programs has been initiated as per the action specified under the "Prevention of Future Occurrences" paragraph in our previous NPDES Noncompliance Letter dated October 26, 1990.

Sincerely,


M. J. McCormick, Jr.
Plant Manager

JCE/JLP/rak

cc: U.S. Nuclear Regulatory Commission
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