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November 21, 2000

Mr. James Newbold
Regional Manager Water Management
Pennsylvania Department of Environmental Protection
Southeast Regional Office
Suite 6010, Lee Park
555 North Lane
Conshohocken, PA 19428

SUBJECT: Follow up letter regarding the Limerick Generating Station, NPDES Permit PA0051923 Non-Compliance for Oil and Grease

REFERENCE: Letter dated September 27, 2000 from R. Braun to J. Newbold.

Dear Mr. Newbold:

We have completed our investigation regarding the August and September Oil and Grease NPDES permit non-compliances. The results are detailed below:

DESCRIPTION OF THE NON-COMPLIANCE

During the month of August and September, 2000, the Limerick NPDES limit for oil and grease was not met for the daily maximum at outfall 201 (Holding Pond). The permit allows a discharge with a maximum daily oil and grease level of 20 mg/l.

On August 16 and September 13, 2000, the daily maximum for oil and grease at outfall 201 was 21.1 mg/l and 21.4 mg/l, respectively. Backup samples for these two dates were analyzed for oil and grease by EPA 413.1 and 413.2 methodologies and confirmed the non-compliance. The results of these analyses were as follows:

Date	EPA 413.1	EPA 413.2
August 16	31.8 mg/l	27 mg/l
September 13	30.2 mg/l	28 mg/l

The monthly averages for the month of August and September were in compliance.

CAUSE OF THE NON-COMPLIANCE:

An investigation of possible sources of oil and grease revealed that the alpha oily waste interceptor (OAT703) was found to be in high flow alarm. That interceptor is one of five interceptors and two oily waste separators designed to collect oil waste prior to industrial wastewater reaching outfall 201 (holding pond). A high flow alarm results in a bypass configuration of the interceptor. Such a configuration would normally occur during major rainfall events. As a result of the alarm, maintenance on that interceptor was scheduled for September 20, 2000. The cause of the high flow alarm was debris that clogged the

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flow orifice. The debris was removed and the interceptor was returned to service. Our investigation is documented in an internal document number I00011778.

CORRECTIVE ACTIONS TAKEN:

The alpha oily waste interceptor was repaired and put back in service. The alpha oily waste separator was cleaned during the week of October 23, 2000.

CORRECTIVE ACTIONS TAKEN TO PREVENT RECURRENCE:

The procedure dealing with the Main Control Room Annunciator Response Cards (ARC-MCR-001) associated with the oily waste interceptors are being enhanced. Operations will direct Chemistry to sample outfall 201 for the parameter oil and grease, whenever the high flow bypass alarm is activated during non-storm events.

If you have any questions please do not hesitate to contact Mr. Douglas Wahl at (610) 718-2733.

Sincerely,

Robert C. Braun
Plant Manager

RCB/dew

cc: U. S. Nuclear Regulatory Commission
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