

Exelon Nuclear
Limerick Generating Station
P.O. Box 2300
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Nuclear

NPDES PA 0054089

December 19, 2006

Mr. Sohan Garg
Chief, Permits Section
Water Management Program
Southeast Section
Department of Environmental Protection
2 East Main Street
Norristown, PA 19401

Subject: Comments on Draft Pottstown Limerick Airport NPDES Permit PA0054089

Reference: PADEP Letter from S. Garg dated 11/7/06

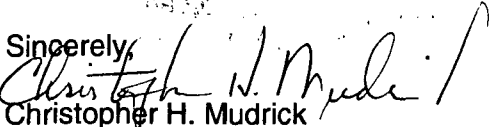
Dear Mr. Garg:

The subject draft permit has been reviewed, and the following comments are being submitted for consideration:

1. Page 15, Part C I.8.b specifies the EPA test method for oil and grease sampling. It is requested that EPA Method 1664A for Total Recoverable Petroleum Hydrocarbons be added to this section.
2. Outfall 003 is currently specified in the Permit as the representative storm water outfall for required annual sampling. Historically, Outfall 003 has not presented discharge flow without a significant rainfall event of extended duration. Consequently, this outfall has posed a significant challenge in satisfying the associated sampling requirements annotated in "Other Requirements", Section I.F.1. It is requested that Outfall 003 be replaced with Outfall 002, 007, or 008 as the designated representative storm water outfall. A site map is attached for reference.
3. From a historical perspective, the only chemical containing ethylene glycol that was stored at the airport was Teleflex AL-5®, a deicing fluid. The use of this product was terminated several years ago, and all containers of the substance have been removed from the facility. Based on this information, it is requested that sampling requirements for ethylene glycol be removed for Outfall 001 and the storm water outfall.

Should you have any questions concerning any of these comments, please contact Mr. Robert Alejnikov at (610) 718-2513. It is also requested that a copy of the Response to Comments Document be forwarded to Limerick Generating Station when complete. Thank you for your attention and cooperation regarding this matter.

Sincerely,

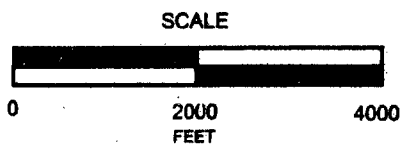
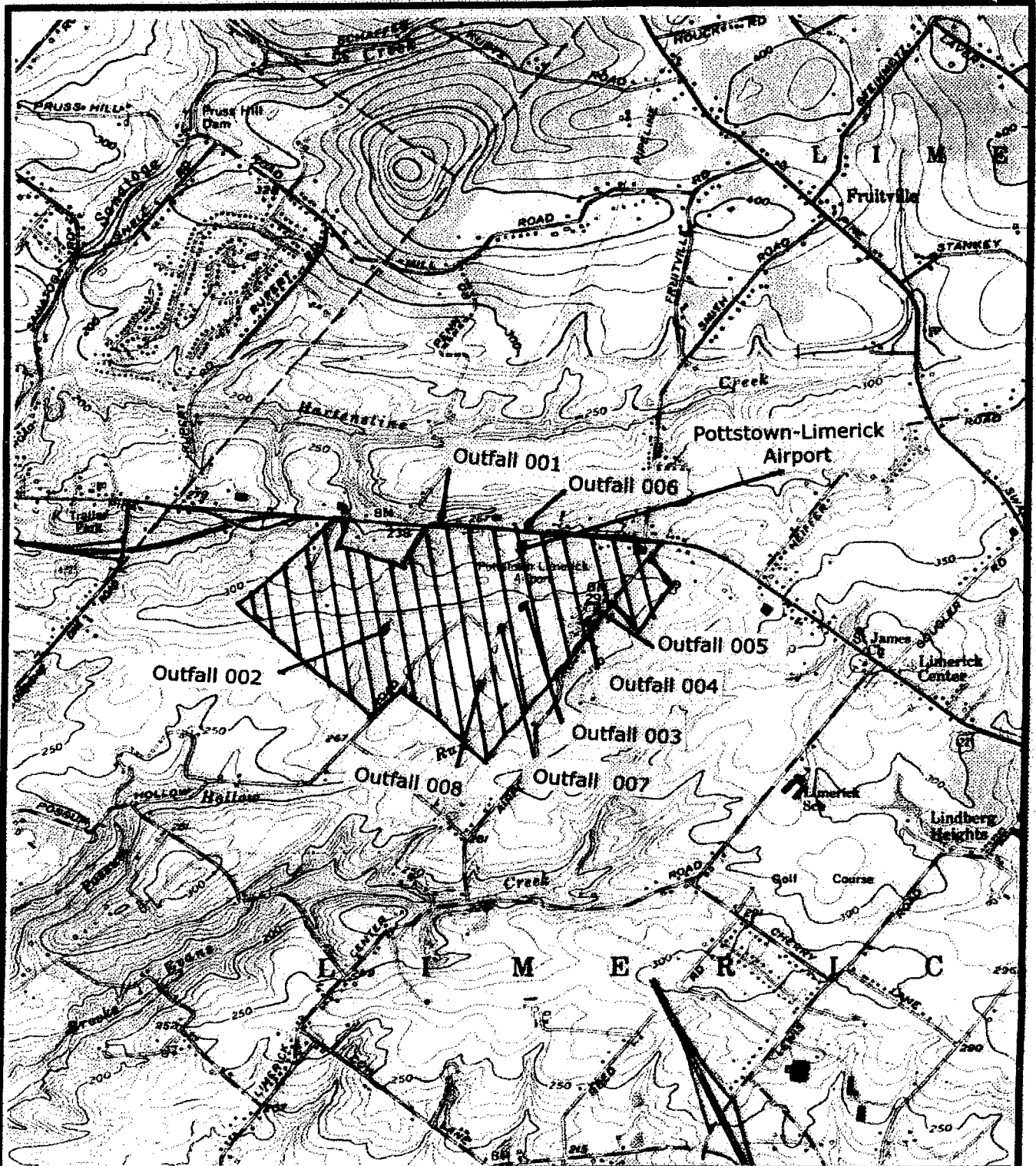

Christopher H. Mudrick
Plant Manager – LGS
Exelon Generation Company, LLC

C001

Attachment: Pottstown-Limerick Airport Location Map

cc: S. Collins, Region 1 Administrator, USNRC
S. Hansell, Resident Inspector, USNRC
Document Control Desk, USNRC, Wash. DC

Bcc R. DeGregorio GML 5-1
C. Mudrick GML 5-1
R. Kreider SSB 2-4
T. Basso SSB 2-2
S. Mitten SSB 2-2
R. Alejnikov SSB 2-2
T. Siglin KSA



Source: National Geographic TOPO! USGS
Quadrangle Mapping, Phoenixville, PA Quadrangle.



POTTSTOWN-LIMERICK AIRPORT
MONTGOMERY COUNTY, PENNSYLVANIA

LOCATION MAP

SCALE: AS SHOWN

DATE: MARCH 2004

FIGURE: 1



McFarland-Johnson, Inc.

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