TENNESSEE VALLEY AUTHORITY
KNOXVILLE, TENNESSEE 37902

AUG 29 1988

Mr. Ralph M. Sinclair
Manager, Permits Section
Division of Water Pollution Control
Tennessee Department of Health
and Environment
TERRA Building
150 Ninth Avenue, North
Nashville, Tennessee 37219-5404

Dear Mr. Sinclair:

WATTS BAR NUCLEAR PLANT (WBN) - NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT NUMBER TN0020168 - UNPERMITTED PAINT SPRAY BOOTH DISCHARGES

During a recent self-inspection of the WBN site, two minor unpermitted discharges were noted. Both of these discharges are from paint spray booths, one of which is used by our construction paint crews and the other by the plant paint crews. The construction paint booth is used sparingly and roughly 500 gallons of wastewater are discharged about every two months. The plant paint spray booth has not been used for about two years, but may be used in the future. When in use, it would also discharge roughly 500 gallons every two months. Hold orders prohibiting discharge from both of these facilities were issued when these unpermitted discharges were discovered.

A sample of the construction paint booth's wastewater was collected and analyzed for priority pollutants and the Resource Conservation and Recovery Act (RCRA) extraction metals. The analytical results are enclosed for your review. The results indicate that the wastewater is nonhazardous. Concentrations of most of the priority pollutants were less than detectable and those which were detected were relatively low.

The construction paint booth discharges to the construction runoff holding pond and the plant paint booth discharges to the yard holding pond. Due to the very low volume and infrequent discharge of these facilities, we propose that they be monitored for hazardous waste characteristics (i.e., the RCRA extraction metals) prior to each batch release and, if nonhazardous, be released with no further monitoring requirements. Results of these analyses would be reported along with the regular discharge monitoring reports. During the release, caution will be taken to minimize the release of suspended solids. The residual sludge will be tested for hazardous waste characteristics and, if hazardous, will be disposed of as hazardous waste. If nonhazardous, the sludge will be solidified and disposed of at the Rhea County Landfill.

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AUG 29 1988

Mr. Ralph M. Sinclair

Thank you for your consideration of this matter. If there are any questions regarding these discharges, please call Abraham H. Loudermilk of my staff at (615) 632-6714 in Knoxville.

Sincerely,

M. Paul Schmierbach, Manager
Environmental Quality

Enclosure
cc (Enclosure):

Mr. Bruce R. Barrett, Director
Water Management Division
U.S. Environmental Protection
Agency, Region IV
345 Courtland Street, NE.
Atlanta, Georgia 30365

Ms. S. C. Black, Assistant Director
for Projects
TVA Projects Division
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852

Mr. F. R. McCoy, Assistant Director
for Inspection Programs
TVA Projects Division
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW., Suite 2900
Atlanta, Georgia 30323

Mr. Philip L. Stewart, Manager
Chattanooga Field Office
Division of Water Pollution Control
2501 Milne Street
Chattanooga, Tennessee 37406

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Lab Sample Number : 88/03878 Project Leader : David M. Varnell

Sample ID Information : WB 4/13-H&P, WB
Sample comments : PAINT BOOTH EFFLUENT
Sample type/matrix : WATER
Sample collected by : FOE
Sample collection date : 880413
Sample login date : 880413
Sample account number : 2340-N03A72-X38511

Alt. IDC	Analysis Performed	result	units
00556	Oil and Grease in Water	5	mg/L
34694	Phenol	< 5.0	ug/L
34586	2-Chlorophenol	< 5.0	ug/L
34283	Bis(2-Clisopropyl)ether	< 5.0	ug/L
34591	2-Nitrophenol	< 5.0	ug/L
34606	2,4-Dimethylphenol	< 5.0	ug/L
34601	2,4-Dichlorophenol	< 5.0	ug/L
34452	4-Chloro-3-methylphenol	< 30.	ug/L
34621	2,4,6-Trichlorophenol	< 20.	ug/L
34616	2,4-Dinitrophenol	< 20.	ug/L
34646	4-Nitrophenol	< 30.	ug/L
34657	4,6-Dinitro-o-cresol	< 30.	ug/L
34433	N-Nitrosodiphenylamine	< 5.0	ug/L
39032	Pentachlorophenol	< 30.	ug/L
34566	1,3-Dichlorobenzene	< 5.0	ug/L
34571	1,4-Dichlorobenzene	< 5.0	ug/L
34536	1,2-Dichlorobenzene	< 5.0	ug/L
34273	Bis(2-chloroethyl)ether	< 5.0	ug/L
34396	Hexachloroethane	< 5.0	ug/L
34447	Nitrobenzene	< 5.0	ug/L
34428	N-Nitrosodipropylamine	< 5.0	ug/L
34408	Isophorone	< 5.0	ug/L
34278	Bis(2-Clethoxy)methane	< 5.0	ug/L
34551	1,2,4-Trichlorobenzene	< 5.0	ug/L
34696	Naphthalene	< 5.0	ug/L
39702	Hexachlorobutadiene	< 5.0	ug/L
34386	HexaClcyclopentadiene	< 5.0	ug/L
34581	2-Chloronaphthalene	< 5.0	ug/L
34200	Acenaphthylene	< 5.0	ug/L
34341	Dimethyl phthalate	< 5.0	ug/L
34626	2,6-Dinitrotoluene	< 5.0	ug/L
34205	Acenaphthene	< 5.0	ug/L
34611	2,4-Dinitrotoluene	< 5.0	ug/L
34381	Fluorene	< 5.0	ug/L
34641	4-Chlorodiphenyl ether	< 5.0	ug/L
34336	Diethyl phthalate	< 5.0	ug/L
34636	4-Bromodiphenyl ether	< 5.0	ug/L
39700	Hexachlorobenzene	< 5.0	ug/L
34461	Phenanthrene	< 5.0	ug/L

34220	Anthracene	< 5.0	ug/L
39110	Dibutyl phthalate	< 5.0	ug/L
34376	Fluoranthene	< 5.0	ug/L
34469	Pyrene	< 5.0	ug/L
39120	Benzidine	< 50.	ug/L
34292	Benzylbutylphthalate	< 5.0	ug/L
34526	Benzo(a)anthracene	< 5.0	ug/L
34320	Chrysene	< 10.	ug/L
34631	3,3'-Dichlorobenzidine	< 25.	ug/L
39100	Bis(2ethylhexyl)phthlate	< 5.0	ug/L
34230	Benzo(b)fluoranthene	< 10.	ug/L
34596	Dioctyl phthalate	< 10.	ug/L
34242	Benzo(k)fluoranthene	< 10.	ug/L
34247	Benzo(a)pyrene	< 10.	ug/L
34403	Indeno(1,2,3-cd)pyrene	< 10.	ug/L
34556	Dibenzo(a,h)anthracene	< 10.	ug/L
34521	Benzo(ghi)perylene	< 10.	ug/L
34438	N-Nitrosodimethylamine	< 5.0	ug/L
00335	Chemical Oxygen Demand	110	mg/L
38260	Methylene Blue Act. Sub.	< 0.1	mg/L
00081	Apparent Color in Water	110	PC Units
00530	Non-Filterable Residue	93	mg/L
00610	Ammonia Nitrogen	0.02	mg/L
00630	Nitrate-Nitrite Nitrogen	0.53	mg/L
00625	Total Kjeldahl Nitrogen	0.84	mg/L
00605	Organic Nitrogen	0.82	mg/L
01059	Thallium, Total in Water	< 50.	ug/L
01007	Barium, Total in Water	410.	ug/L
01012	Beryllium, Tot in Water	< 1.	ug/L
01077	Silver, Total in Water	< 10.	ug/L
01102	Tin, Total in Water	< 50.	ug/L
01062	Molybdenum, Tot in Water	< 20.	ug/L
01092	Zinc, Total in Water	6000.	ug/L
01045	Iron, Total in Water	6500.	ug/L
01022	Boron, Total in Water	< 50.	ug/L
01055	Manganese, Tot in Water	120.	ug/L
00927	Magnesium, Tot in Water	9.8	mg/L
00916	Calcium, Total in Water	31.	mg/L
01042	Copper, Total in Water	20.	ug/L
01105	Aluminum, Total in Water	300.	ug/L
01152	Titanium, Total in Water	46.	ug/L
79741	Arsenic, RCRA Extract	< 100.	ug/L
79737	Selenium, RCRA Extract	< 100.	ug/L
79734	Cadmium, RCRA Extract	< 1.	ug/L
79736	Lead, RCRA Extract	< 50.	ug/L
79733	Barium, RCRA Extract	40.	ug/L
79735	Chromium, RCRA Extract	< 50.	ug/L
HRDCLC/W	Ca and Mg Hardness Calc.	118.	mg/L CaCO3
79738	Silver, RCRA Extract	< 10.	ug/L
71900	Mercury, Total in Water	1.4	ug/L
79729	Mercury, RCRA Extract	< 0.2	ug/L
00680	Total Organic Carbon	44	mg/L
00745	Total Sulfide in Water	0.14	mg/L

00940	Chloride in Water	5	mg/L
00945	Sulfate in Water	10	mg/L
00951	Fluoride in Water	0.1	mg/L
71870	Bromide in Water	<0.1	mg/L
00950	Dis. Fluoride in Water	<0.1	mg/L
00665	Total Phosphorus	0.35	mg/L
00310	Biochem Oxy Demand 5 Day	5.8	mg/L
01027	Cadmium, Total in Water	4	ug/L
01034	Chromium, Total in Water	64	ug/L
01097	Antimony, Total in Water	< 1	ug/L
01002	Arsenic, Total in Water	< 1	ug/L
01051	Lead, Total in Water	240	ug/L
01067	Nickel, Total in Water	< 1	ug/L
01147	Selenium, Total in Water	< 1.	ug/L
01037	Cobalt, Total in Water	13	ug/L
34030	Benzene	< 10.	ug/L
32101	Bromodichloromethane	< 10.	ug/L
32104	Bromoform	< 10.	ug/L
34413	Bromomethane	< 10.	ug/L
32102	Carbon tetrachloride	< 10.	ug/L
34301	Chlorobenzene	< 10.	ug/L
34311	Chloroethane	< 10.	ug/L
34576	2-Chloroethylvinyl ether	< 10.	ug/L
32106	Chloroform	< 10.	ug/L
34418	Chloromethane	< 10.	ug/L
32105	Dibromochloromethane	< 10.	ug/L
34496	1,1-Dichloroethane	< 10.	ug/L
34531	1,2-Dichloroethane	< 10.	ug/L
34501	1,1-Dichloroethylene	< 10.	ug/L
34546	trans1,2Dichloroethylene	< 10.	ug/L
34541	1,2-Dichloropropane	< 10.	ug/L
34704	cis-1,3-Dichloropropene	< 10.	ug/L
34699	trans-1,3Dichloropropene	< 10.	ug/L
34371	Ethylbenzene	< 10.	ug/L
34423	Methylene chloride	< 10.	ug/L
34516	1,1,2,2-TetraClethane	< 10.	ug/L
34475	Tetrachloroethylene	< 10.	ug/L
34010	Toluene	< 10.	ug/L
34506	1,1,1-Trichloroethane	< 10.	ug/L
34511	1,1,2-Trichloroethane	< 10.	ug/L
34488	Trichlorofluoromethane	< 10.	ug/L
39175	Vinyl chloride	< 10.	ug/L
39180	Trichloroethylene	< 10.	ug/L
34210	Acrolein	< 100.	ug/L
34215	Acrylonitrile	< 100.	ug/L
00720	Total Cyanide in Water	< 0.02	mg/L
32730	Total Phenol in Water	14	ug/L

LAB NAME: TVA Laboratory Branch:
GC/MS OPERATIONS

DATE: 4/20/88

ANALYST: CVS

RESULTS OF LIBRARY SEARCH FOR NON-PRIORITY POLLUTANT COMPOUNDS

LAB#	FIELD ID	DATE RECEIVED	COMPOUNDS	APPROXIMATE CONCENTRATION
88/03878			2-Butanone (MEK)	15 µg/L
			Benzene, 1,3-dimethyl- (m-xylene)	13 µg/L