



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Release All

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 • (312) 814-6030

ROD R. BLAGOJEVICH, GOVERNOR • DOUGLAS P. SCOTT, DIRECTOR

217/785-0561

March 31, 2006

CERTIFIED MAIL # 7004 2510 0001 8655 8716
RETURN RECEIPT REQUESTED

Exelon Generation - Dresden
Attn: Danny Bost
Site Vice President
6500 N. Dresden Rd.
Morris, IL 60450

Re: Violation Notice: EXELON GENERATION - DRESDEN STATION
Violation Notice No.: M-2006-02010

Dear Mr. Bost:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act, 415 ILCS 5/31(a)(1), and is based upon review of available information and investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of violations of environmental statutes, regulations or permits as set forth in Attachment A to this letter. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified violations, including an estimate of a reasonable time period to complete the necessary activities. However, due to the nature and seriousness of the violations cited, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. The response must address each violation specified in Attachment A and include for each, an explanation of the activities that will be implemented and the time schedule for the completion of each activity. Also, if a pollution prevention activity will be implemented, indicate that intention in any written response. The written response will constitute a proposed Compliance Commitment Agreement ("CCA") pursuant to Section 31 of the Act. The Illinois EPA will review the proposed CCA and will accept or reject the proposal within 30 days of receipt.

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EXELON GENERATION - DRESDEN STATION
VN M-2006-02010

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with a referral to the prosecutorial authority.

Written communications should be directed to BEVERLY BOOKER at the ILLINOIS EPA, BUREAU OF WATER, CAS #19, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276. All communications must include reference to this Violation Notice number, M-2006-02010.

Questions regarding this Violation Notice should be directed to Gary Forsee at 217/785-0561.

Sincerely,



Michael S. Garretson, Manager
Compliance Assurance Section
Bureau of Water

Attachment

cc: Melburg, Peg
Ryhak, Robert

cc addresses and bccs

Peg Melburg
Exelon Generation - Braidwood
31000 S. Rt. 53
Braceville, IL 60407

Bob Rybak
Regulatory Assurance
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, IL 60450-9765

ATTACHMENT A

EXELON GENERATION - DRESDEN STATION, VIOLATION NOTICE NO. M-2006-02010:

Questions regarding the violations identified in this attachment should be referred to Gary Forsee at (217) 785-0561.

A review of information available to the Illinois EPA indicates the following violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation including an estimated time period for resolution.

Groundwater Quality

No person shall cause, threaten, or allow the release of any contaminant to a resource groundwater such that treatment or additional treatment is necessary to continue an existing use or to assure a potential use of such groundwater, or such that the existing or potential use of such groundwater is precluded. Exelon Generation - Dresden Station must cease and desist of any further violations of the Act.

<u>Violation Date</u>	<u>Violation Description</u>	
	Sampling results indicate violations of Section 12 of the Act, the General Prohibition Against Use Impairment of Resource Groundwater, and the causing of the groundwater quality standard of tritium (20,000 pCi/L) to be exceeded during the time period and at the location(s) designated below:	
11/1/05	W-2R	91,000 pCi/L
	W-3	73,000 pCi/L
	T-1	169,000 pCi/L
11/29/05	DSP-124	37,200 pCi/L
12/6/05	E-10	28,000 pCi/L
12/30/05	W-2R	63,000 pCi/L
	T-1	128,000 pCi/L
1/3/06	T-1	84,000 pCi/L
1/4/06	W-2R	93,000 pCi/L
	E-9	24,000 pCi/L
1/19/06	E-3	89,000 pCi/L
1/31/06	T-6	86,000 pCi/L
	E-3	90,000 pCi/L
	W-2R	60,000 pCi/L

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	T-1	46,000 pCi/L
	W-3	21,000 pCi/L
2/10/06	E-3	486,000 pCi/L
2/11/06	E-3	510,000 pCi/L
	E-10	20,000 pCi/L
	T-5	51,000 pCi/L
2/12/06	T-6	124,000 pCi/L
	E-3	589,000 pCi/L
2/13/06	T-6	131,800 pCi/L
	E-3	680,100 pCi/L
	W-2R	63,800 pCi/L
2/14/06	T-6	134,300 pCi/L
	E-3	550,400 pCi/L
2/15/06	T-6	128,300 pCi/L
	E-3	1,069,400 pCi/L
2/16/06	T-6	102,300 pCi/L
	T-1	48,400 pCi/L
2/17/06	E-3	653,000 pCi/L
	T-1	65,900 pCi/L
2/18/06	T-6	24,800 pCi/L
	T-1	47,400 pCi/L
2/19/06	T-6	48,300 pCi/L
	E-3	30,000 pCi/L
	T-1	47,700 pCi/L
2/20/06	T-6	57,600 pCi/L
	E-3	47,600 pCi/L
	T-1	43,000 pCi/L
2/21/06	T-6	50,100 pCi/L
	T-1	40,100 pCi/L
2/22/06	T-6	47,100 pCi/L
	T-1	43,100 pCi/L

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2/23/06	T-1	39,100 pCi/L
	T-6	35,000 pCi/L
	E-3	36,500 pCi/L
2/24/06	T-1	34,700 pCi/L
	T-6	25,600 pCi/L
	E-3	31,600 pCi/L
2/25/06	T-1	36,200 pCi/L
	E-3	21,900 pCi/L
2/26/06	T-1	37,100 pCi/L
2/27/06	T-1	38,800 pCi/L
2/28/06	T-1	40,200 pCi/L
3/1/06	T-1	57,700 pCi/L
3/2/06	T-1	68,800 pCi/L
3/3/06	T-1	89,200 pCi/L
3/4/06	T-1	91,800 pCi/L
3/5/06	T-1	113,500 pCi/L
3/7/06	T-1	217,700 pCi/L
3/8/06	W-3	66,800 pCi/L
	T-1	226,300 pCi/L

Rule/Reg: Section 12(a) and (d) of the Act, 415 ILCS 5/12(a) and (d) (2004), 35 Ill. Adm. Code 620.115, 35 Ill. Adm. Code 620.301(a) (1) and (2), and 35 Ill. Adm. Code 620.410(e) (3).

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EXELON GENERATION - DRESDEN STATION, VIOLATION NOTICE NO. M-2006-02010:

<u>Violation Date</u>	<u>Violation Description</u>	
	Sampling results indicate violations of Section 12 of the Act, the General Prohibition Against Use Impairment of Resource Groundwater during the time period and at the location(s) designated below:	
11/1/05	T-2	9,000 pCi/L
	T-6	7,000 pCi/L
	R-1	1,000 pCi/L
	R-2	1,000 pCi/L
	R-3	2,000 pCi/L
	E-2	1,000 pCi/L
	E-3	1,000 pCi/L
	E-9	3,000 pCi/L
	E-10	1,000 pCi/L
11/29/05	DSP-149	590 pCi/L
	DSP-156	226 pCi/L
	DSP-159M	784 pCi/L
12/6/05	E-9	5,000 pCi/L
12/30/05	T-6	6,000 pCi/L
	W-3	12,000 pCi/L
	T-2	3,000 pCi/L
	T-6	6,000 pCi/L
1/3/06	T-6	17,000 pCi/L
	E-3	5,000 pCi/L
	E-9	2,000 pCi/L
	E-10	3,000 pCi/L
	W-3	7,000 pCi/L
	T-2	3,000 pCi/L
	T-6	17,000 pCi/L
	R-1	1,000 pCi/L
	R-2	2,000 pCi/L
	R-3	1,000 pCi/L
	E-2	1,000 pCi/L
	E-3	5,000 pCi/L
1/4/06	E-5	1,000 pCi/L
	E-10	2,000 pCi/L
1/15/06	Thorsen well	680 pCi/L

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1/17/06	DSP-106	1,770 pCi/L
	DSP-108	2,200 pCi/L
	DSP-122	1,240 pCi/L
	DSP-123	13,200 pCi/L
	DSP-124	15,200 pCi/L
	DSP-125	714 pCi/L
	DSP-150	1,210 pCi/L
1/19/06	E-9	1,000 pCi/L
1/31/06	E-10	17,000 pCi/L
	T-2	2,000 pCi/L
2/11/06	E-8	1,000 pCi/L
	E-10	5,000 pCi/L
2/12/06	E-9	2,000 pCi/L
	E-10	5,000 pCi/L
2/13/06	DSP-116	1,800 pCi/L
	E-9	1,400 pCi/L
	E-10	6,300 pCi/L
	DSP-125	1,500 pCi/L
	E-5	1,500 pCi/L
	E-6	1,300 pCi/L
2/14/06	E-8	2,700 pCi/L
	E-9	1,800 pCi/L
	E-10	6,200 pCi/L
	E-2	600 pCi/L
2/15/06	DSP-116	600 pCi/L
	E-10	4,700 pCi/L
	Thorsen well	739 pCi/L
	DSP-124	11,752 pCi/L
	E-2	1,400 pCi/L
	DSP-149	778 pCi/L
	DSP-159M	348 pCi/L
2/16/06	E-8	1,900 pCi/L
	DSP-124	9,300 pCi/L
	DSP-116	400 pCi/L

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2/17/06	DSP-116	1,100 pCi/L
	T-6	11,200 pCi/L
	DSP-124	12,000 pCi/L
	E-5	1,900 pCi/L
2/18/06	DSP-116	1,600 pCi/L
	DSP-124	12,200 pCi/L
2/19/06	DSP-116	1,700 pCi/L
	DSP-124	10,300 pCi/L
2/20/06	DSP-116	1,300 pCi/L
	E-8	2,600 pCi/L
	DSP-124	9,800 pCi/L
2/21/06	DSP-116	1,100 pCi/L
	E-3	19,900 pCi/L
	E-8	2,800 pCi/L
	DSP-124	9,500 pCi/L
2/22/06	DSP-116	800 pCi/L
	E-3	17,100 pCi/L
	E-8	2,400 pCi/L
	DSP-124	11,100 pCi/L
	DSP-105	389 pCi/L
	DSP-106	2,007 pCi/L
	DSP-107	6,922 pCi/L
	DSP-108	2,467 pCi/L
	DSP-123	14,179 pCi/L
	DSP-151	211 pCi/L
2/23/06	DSP-124	9,700 pCi/L
	E-8	2,900 pCi/L
	DSP-116	400 pCi/L
2/24/06	DSP-124	9,600 pCi/L
	E-5	600 pCi/L
	E-8	2,600 pCi/L
	DSP-116	1,100 pCi/L
2/25/06	DSP-124	8,700 pCi/L
	T-6	19,000 pCi/L
	E-5	700 pCi/L
	E-8	2,000 pCi/L
	DSP-116	1,500 pCi/L

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2/26/06	DSP-124	9,200 pCi/L
	T-6	17,000 pCi/L
	E-3	13,000 pCi/L
	E-5	2,700 pCi/L
	E-8	2,600 pCi/L
	DSP-116	1,100 pCi/L
2/27/06	T-6	11,800 pCi/L
	DSP-116	900 pCi/L
2/28/06	DSP-124	6,600 pCi/L
	T-6	6,300 pCi/L
3/1/06	DSP-124	9,200 pCi/L
	DSP-125	1,800 pCi/L
	T-6	6,500 pCi/L
	E-5	900 pCi/L
	DSP-116	1,500 pCi/L
3/2/06	DSP-124	9,000 pCi/L
	DSP-125	11,400 pCi/L
	T-6	5,600 pCi/L
	E-5	1,800 pCi/L
3/3/06	DSP-124	9,600 pCi/L
	DSP-125	1,800 pCi/L
	T-6	6,200 pCi/L
	E-5	1,100 pCi/L
	DSP-116	2,400 pCi/L
3/4/06	DSP-124	8,300 pCi/L
	DSP-125	1,700 pCi/L
	T-6	7,200 pCi/L
	E-5	1,600 pCi/L
	DSP-116	1,200 pCi/L
3/5/06	DSP-124	7,300 pCi/L
	DSP-125	400 pCi/L
	T-6	7,800 pCi/L
	DSP-116	500 pCi/L
3/6/06	DSP-124	8,800 pCi/L
	DSP-125	1,900 pCi/L
	T-6	6,000 pCi/L

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3/7/06	DSP-124	7,600 pCi/L
	DSP-125	1,700 pCi/L
	T-6	6,000 pCi/L
	E-5	800 pCi/L
	DSP-116	1,700 pCi/L

3/8/06	DSP-124	7,500 pCi/L
	DSP-125	1,000 pCi/L
	T-6	5,800 pCi/L
	E-5	600 pCi/L
	DSP-116	600 pCi/L

Rule/Reg. Section 12(a) and (d) of the Act, 415 ILCS 5/12(a) and (d)(2004), 35 Ill. Adm. Code 620.115, and 35 Ill. Adm. Code 620.301(a) (1) and (2).

Discharging Wastewaters Without NPDES Permit

Determine the cause and extent of all wastewater discharges, including those containing tritium, which have exited Exelon's wastewater treatment and discharge system other than through the NPDES-permitted outfall discharge points and investigate corrective actions to eliminate such discharges. Submit a detailed response including a timetable for each corrective measure proposed. Compliance is expected to be pursued immediately.

<u>Violation Date</u>	<u>Violation Description</u>
12/07/05 & 3/10/06	Discharge of wastewater containing contaminants from areas of the discharge canals other than the permitted outfall points.

Rule/Reg. Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and f) (2004); 35 Ill. Adm. Code 309.102(a).

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Failure to Ensure Proper Operation and Maintenance and Failure to Mitigate

Determine the cause and extent of all wastewater discharges, including those containing tritium, which have exited Exelon's wastewater treatment and discharge system other than through the NPDES-permitted outfall discharge points and investigate corrective actions to eliminate such discharges. Submit a detailed response including a timetable for each corrective measure proposed. Compliance is expected to be pursued immediately.

<u>Violation Date</u>	<u>Violation Description</u>
12/07/05 & 03/10/06	Failure to prevent or mitigate the discharge of wastewater containing contaminants from areas other than permitted outfall points.
Rule/Reg.	Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (2004); 35 Ill. Adm. Code 306.102(a) and (b), 309.102(a); Standard Conditions 1, 4 and 5 of NPDES Permit No. IL0002224.

Failure to Report

Determine the nature and cause of all instances where Exelon failed to report violations of the terms and conditions of its NPDES permit to the Illinois EPA as required by the Act, Illinois PCB regulations and the terms and conditions of Exelon's NPDES Permit No. IL0002224 and investigate corrective actions to eliminate such reporting failures. Submit a detailed response including a timetable for each corrective measure proposed. Compliance is expected to be pursued immediately.

<u>Violation Date</u>	<u>Violation Description</u>
12/07/05 & 03/10/06	Failure to provide notification of noncompliance to the Illinois EPA.
Rule/Reg.	Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (2004); 35 Ill. Adm. Code 309.102(a); Standard Condition 12(e) and (f) of NPDES Permit No. IL0002224.