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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
 AUTH.NAME AUTHOR AFFILIATION
 FURLER, T. Pennsylvania Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 AUGUSTINE, K. Pennsylvania, Commonwealth of
 SIRACUSE, J. Pennsylvania, Commonwealth of

SUBJECT: NPDES noncompliance notification: on 940825 ethylene glycol spill.

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NOTES: 05000387

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Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

September 16, 1994

Mr. Kevin Augustine
Pennsylvania Department of Environmental Resources
Bureau of Solid Waste Management
90 East Union St.
Second Floor
Wilkes-Barre, PA 18701

Mr. Jim Siracuse
Luzerne County Emergency Management Agency
Luzerne County Courthouse
Wilkes-Barre, PA 18711

SUSQUEHANNA STEAM ELECTRIC STATION
FOLLOW-UP ON SPILL OF ETHYLENE GLYCOL
CCN 741326 FILE R9-7
PLE- 18027

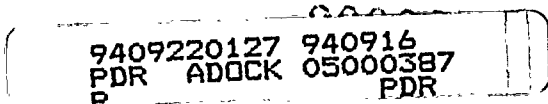
Dear Sirs:

On August 25, there was an ethylene glycol spill at PP&L's Susquehanna Steam Electric Station (SSES). On that same day, I notified your agency of the spill by telephone. This letter is a follow-up to that notification.

SUMMARY OF EVENTS

Six drums of 50% ethylene glycol solution were stored in a bermed area of the waste accumulation area at SSES. The drums were five years old and appeared to be in generally good condition. The product was manufactured as an agent for deicing roads and for melting snow. About a year ago, we replaced this product with another deicer. Since ethylene glycol was recently listed as a hazardous air pollutant in the Clean Air Act amendments, PP&L has refrained from using ethylene glycol as a deicer. We decided to dispose of it when we couldn't find anyone who could use the product for a purpose that would not result in its release to the environment. It was at the waste accumulation area in preparation for shipment to a disposal facility the following week.

The waste accumulation area was inspected on August 24 and there were no problems noted with the drums at that time. During the inspection at 1205 hours on August 25, it



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was discovered that one drum had developed a leak and lost almost all of its contents. The material leaked into a concrete bermed area, then seeped through a joint between the wall and floor of the berm. (Repairs to the joints in the berm had actually begun in the days before the spill, but had not yet been completed.) Approximately 500 pounds of the 50% solution -- effectively 250 pounds of pure ethylene glycol -- soaked into the ground along the joint. The affected area was about 15 feet long by three feet wide. Another 20 pounds of solution lay on the floor of the berm in puddles.

Spill response personnel cleaned up the free-standing solution by using clay absorbent and absorbent pads. No personnel were exposed to direct contact with the solution at any time. The five other drums were relocated to an area with a more secure berm. No attempt was made to recover the solution which soaked into the ground.

THE NOTIFICATIONS

As I stated earlier, ethylene glycol is now listed as a hazardous air pollutant in the Clean Air Act amendments. The Comprehensive Environmental Responsibility, compensation, and Liability Act (CERCLA) states that any hazardous air pollutant listed in the Clean Air Act is considered a hazardous substance and has a statutory reportable quantity (RQ) of one pound until a regulatory RQ is established for it. An RQ of 5000 pounds has been proposed for ethylene glycol, but had not been approved prior to the spill. Therefore, from a regulatory standpoint, the spill was reportable, even though there was negligible environmental impact.

A notification was made to the Coast Guard National Response Center, as required by CERCLA. In addition, courtesy notifications were made to the Luzerne County Emergency Management Agency and the Pennsylvania Department of Environmental Resources. The US Nuclear Regulatory Commission was also notified of the spill.

THE AFTERMATH

The remaining five drums of ethylene glycol solution have been sent to a licensed disposal facility, as originally planned. The joints in the berm have been repaired so that the integrity of the berm was restored. Regarding the spilled material, it is our intent to leave it where it is (disposal in place). We feel that this is justified because the product is highly biodegradable. (Recall that the product was originally manufactured for deicing roads and walkways.)

I discussed our plan for disposal with Jerry Lehman of PaDER on August 26, 1994. Mr. Lehman said that he would have a staff chemist call me and inform me whether disposal in place is allowed. Since I have not heard from PaDER since then, we have assumed that PaDER concurs with this method of disposal.

September 16, 1994

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CCN 741326
PLE- 18027

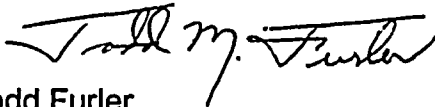
FILE R9-7

If you have any questions or comments, please call either of the following persons for assistance:

Todd Furler, A9-3
PP&L
Two North Ninth St.
Allentown, PA 18101
(610) 774-7888

Tim Belles
Susquehanna SES
Effluents Management
PO Box 467
Berwick, PA 18603
(717) 542-3800

Sincerely,



Todd Furler
Project Engineer - Nuclear

Copy to:

~~U.S. Nuclear Regulatory Commission~~
U.S. Environmental Protection Agency
Pennsylvania Emergency Management Agency