

NPDES NONCOMPLIANCE NOTIFICATION
Possible Noncompliance With Daily Average/Maximum Limitation
March 26, 1980

Plant: Palisades Permit No: MI 0001457
Outfall Description: Turbine Sump Oil Separator Waste Outfall No: 800218
Parameter: Oil and Grease Parameter No: 00556

1. Date of Incident: March 10, 1980
2. Identification of specific effluent limitation exceeded:
Daily maximum limit for oil and grease of less than 20 mg/l.
3. Description of Incident:
A grab sample was collected from Outfall 000/00G (turbine sump oil separator Tank T-41) on March 10, 1980 and sent to a vendor for analysis. The results were received March 18, 1980 by telephone and were reported at 32.6 mg/l. At this time, it appears that noncompliance was a one time occurrence and and is not expected to continue.
4. Apparent Cause:
See attached sheet, Item No 4.
5. If not immediately corrected, the anticipated time the condition is expected to continue:
NA
6. Corrective Action - The following corrective action was taken or will be taken to reduce, eliminate and prevent recurrence:
See attached sheet, Item No 5.
7. Additional Comments:
NA
8. Signed: R L Fobes
Ronald L Fobes

4. On March 5, 1980, a spill of diesel fuel was detected in the diesel generator room. This spill resulted when a fuel tank high level shut off switch failed to stop a transfer pump while filling the fuel tank. This spilled diesel fuel then ran down a floor drain to the turbine building sump.

Ordinarily, the floor drains in this room have plugs in them to stop any oil from reaching the turbine sump. These plugs were removed a few days before because a water line break in the room required draining water to the turbine sump. The water level reached 2 feet deep, endangering emergency generating equipment. The plugs were left out to prevent further flooding of this critical equipment.

After the oil reached the turbine sump, some of it was pumped through the oil removal equipment to T-41 (outfall 000/00G). This oil removal system is rated to reduce the oil concentration by a factor of ten thousand; but this performance was not good enough to reduce the oil and grease to below 20 mg/liter.

5. (Corrective Action)

Immediate action was to stop the spilling fuel in the diesel generator room, and begin cleanup in that room to prevent further flow into the turbine sump. A three man crew was assigned to begin cleanup of the turbine sump and worked from noon until 4 p.m. on March 5, 1980. The oil was pumped from the surface of the turbine sump into waste oil containers (55 gallon drums). The turbine sump oil separator tank was then cleaned by four additional men called in on overtime to pump off any oil on the surface of that tank. This oil/water mixture was also pumped into waste oil drums. This crew worked from 4 p.m. until 8 p.m. on March 5.

After the clean up effort was complete, oil absorbant bundles were floated on the surface of the turbine sump and the turbine sump oil separator tank to further absorb small quantities of oil left in those locations. It should be noted that the oil removal system delta pressure indicators had been repaired and calibrated prior to the spill and these indicated that the filters were performing correctly.

At this time (3/5/80) it was felt that the above cleanup efforts would be sufficient to prevent any oil from being released to the environment. It should be stated that during and for a week following the incident the daily observation for oil on the surface water at the plant discharge showed no visible oil on the surface waters.

Also at this time a request for modification to the floor drains in the diesel generator rooms was initiated to better control oil spills in those rooms. (copy attached).

(Corrective Action on March 18, 1980)

Upon receiving a telephone call from General Analytics (vendor laboratory) about the high oil and grease in the March 10, 1980 sample, further action was taken as follows: The surface of the turbine sump oil separator was examined and a one-inch thick layer of oil was found. A contractor was called and this tank was drained and cleaned on March 19, 1980. The oil treatment system filters were also changed, though not completely exhausted.

Also being considered at this time is the purchase of a hydro-carbon detection system which will better monitor the water being released through the turbine sump system and provide an alarm when oil is detected. An Action Item Record was initiated to assure that this consideration is completed in a timely manner. (Copy attached).

Also being considered is the purchase of petroleum embiber beads for insertion in the diesel generator room drains that allow water to pass to waste but which swell when in contact with oil and block further flow.