



VIRGINIA POWER

April 3, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. R. R. Jenkins
Virginia Water Control Board
Piedmont Regional Office
2201 West Broad Street
Richmond, VA 23230

Re: **REPORTABILITY OF OIL SPILLS -
SURRY POWER STATION DISCHARGE CANAL**

Dear Mr. Jenkins:

As you are aware, Virginia Power has routinely provided the Virginia Water Control Board with a verbal and five-day written notification of all oil sheens observed in the discharge canal at Surry Power Station. Many of these sheens have resulted from extremely minor events such as residual yard runoff and all have been easily contained and subsequently cleaned up within the boundaries of the concrete-lined portion of the discharge canal prior to release to the James River.

The discharge canal extends from the station to the James River. It is 3/4 of a mile long, 200 feet wide, and 20 feet deep. It serves as a conduit for discharges from the power station to the river and can be physically divided into two portions. The upper portion (photo 1) nearest the station is man-made, concrete-lined, and surrounded by an earth bank which is on approximately a 45° slope from the plant. In order to reach the upper portion of the canal one would have to go out-side of the plant's fenced in area and down a long, steep staircase. The lower portion (photo 2) extends from the concrete-lined area through a granite boulder groin into the river. Two floating containment booms, used to contain any oil discharges or spills, have been permanently installed across the canal between these two portions. A third boom has also recently been placed further up the canal below the storm drains as an additional control measure. These booms, in conjunction with the steeply banked slopes, effectively prevent navigation in the upper portion and act to contain any oil released to the discharge canal within this upper portion.

While we have continued to respond in writing to each oil spill event, it has been our contention that since the cooling water discharge canal is a concrete lined conveyance designated as waste stream outfall 001 in our NPDES permit VA0004090, it does not constitute state or navigable waters. Therefore, any oil spills reaching only the concrete-lined portion of the

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discharge canal which are wholly contained within this area and subsequently removed do not constitute reportable releases.

The status of reportability in no way lessens our resolve to eliminate all spills in the first place. The resources necessary to locate, report and cleanup a spill are better and more properly focused elsewhere. We will therefore continue to emphasize prevention however, in the event a release should occur, immediate response and verbal notification will be provided to the Virginia Water Control Board regardless of the quantity or area involved. Reporting to the National Response Center and written notification to your office will also be provided should a release escape the discrete containment area provided by the concrete liner and booms.

If you have any questions or desire additional information, please contact Mr. Glenn Bishop at (804) 273-2988.

Sincerely,



B. M. Marshall, P.E.
Manager
Water Quality

WGB:rw:1894

cc: National Response Center (CERTIFIED MAIL)
Coast Guard Headquarters Bldg.
Room 2611
2100 2nd Street, S.W.
Washington, DC 20460

Environmental Protection Agency (CERTIFIED MAIL)
Region III
Emergency Response Section
8411 Chestnut Building
Philadelphia, Pennsylvania 19107

U.S.N.R.C., Atlanta Georgia, Docket #50/280-50-281
U.S.N.R.C., Washington, DC, Docket #50/280-50-281
U.S.N.R.C., Senior Resident Inspector, Surry Power Station