

Report of Non-compliance
Permit No. PA 0009920
Report No. 82-03

Date of Occurrence: March 8 and 18, 1982

Identification of Occurrence:

Oil and grease samples for DSN 105 were not collected during periods of effluent release in the monitoring period of March 1982. The non-compliance with the monitoring frequency of oil and grease at DSN 105 was identified on March 31, 1982, during review of NPDES data for preparation of the Monthly Discharge Monitoring Report.

Description of Discharge:

DSN 105, is an intermittent discharge of waste water from the Unit 1 Secondary Waste Neutralizing Tank. The system is sampled prior to discharge into the station's main discharge line (DSN 001). The Secondary Waste Neutralization Tank is used as a collection and treatment facility.

Cause of Non-compliance:

Due to the intermittent, "as needed", basis of the discharge of DSN 105, sampling cannot be routinely scheduled, as is done with other continuously operating discharge streams. Typically, this presents no problem in that multiple releases are made from DSN 105, thus affording multiple opportunities to fulfill the required two per month samples for oil and grease analysis. However, during this reporting period, a lack of communication between operations and chemistry resulted in a failure to sample during either discharge.

Duration of Non-compliance:

March 8, 1982, 84,900 gallons discharged over 1174 minutes
March 18, 1982, 88,296 gallons discharged over 940 minutes.

Assuming an average concentration of 1 mg/l oil and grease, based on collected data from DSN 105 during the past 6 months, the most probable amount of oil and grease in the discharge would be between 0.40 and 0.80 pounds per day. The quantity of oil and grease varying the amount of actual discharge.

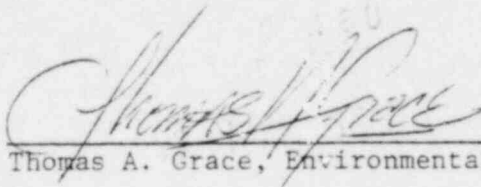
Corrective Action to Prevent Recurrence:

Short Term: An in situ sample of the Secondary Waste Neutralizer Tank was obtained and analyzed on March 31, 1982, upon realization that a sample for oil and grease was not performed during the two discharges through DSN 105 on March 8 and 18. The analysis of this sample indicated an oil and grease concentration of 2.0 mg/l. If this amount of oil and grease discharged would be 1.42 and 1.47 pounds per day respectively. In addition, a review of past non-compliances from DSN 105 was done. The review indicated that historically the NPDES parameter set for oil and grease at DSN 105 has never been violated.

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Long Term: Operating procedures for station generated releases from the Secondary Waste Neutralizer Tank (DSN 105) will be changed to require that each discharge batch is to be sampled and an oil and grease analysis performed unless notified by the Chemistry Department.

Prepared by :



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Date: April 19, 1982