



Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038

Nuclear Department

MAR 29 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
ARTICLE NUMBER: Z 691 525 734

NLR-E94059

Mr. Steven Mathis
NJ Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Southern Bureau of Water and Hazardous Waste Enforcement
Suite 301 South
20 East Clementon Road
Gibbsboro, NJ 08026

Dear Mr. Mathis:

HOPE CREEK GENERATING STATION
NJPDES PERMIT NO. NJ0025411
OIL DISCHARGE TO RIVER
CASE NOS. 94-03-24-1037-39 AND 94-03-24-1659-11

On March 24, 1994, Public Service Electric and Gas Company (PSE&G) reported a violation of the daily maximum discharge limit for petroleum hydrocarbons from the discharge of the Low Volume and Oily Waste (LV&OW) system, DSN 461C. In accordance with NJAC 7:14A-3.10(d), PSE&G reported this violation to the NJDEPE Hotline and was assigned Case No. 94-03-24-1037-39.

The LV&OW system is essentially an oil water separator equipped with a crossflow plate pack to enhance gravity separation. The system treats potentially oily wastewater and stormwater from the Hope Creek site. Oil and sludge are removed from the separator and transferred to separate storage tanks for disposal. The treated effluent is then discharged through the cooling tower blowdown line, DSN 461A, to the Delaware River.

The result of the system's effluent sample obtained by Hope Creek Chemistry personnel on March 16 indicated a petroleum hydrocarbon concentration of 22.4 mg/l. The daily maximum discharge limit is 15 mg/l. PSE&G was informed of the sample results on the morning of March 24 by our contract laboratory, NET Atlantic. Chemistry personnel immediately took actions to secure the influent lift station to the LV&OW system to prevent further discharges.

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The power is in your hands.

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The effluent violation was caused by an overload of the system's treatment capacity due to an excessive amount of waste oil transferred from the Diesel Building sump. The system remained out of service until both the sump and downstream lift station were cleaned. In order to reduce the potential for future violations, caution tags have been hung on inlet drains in the diesel fuel oil storage tank room to control the discharge of oily wastes to the sump.

At approximately 3:25 p.m., an attempt was made to return the LV&OW system to service. During the restart, Chemistry personnel stationed at the separator observed a small quantity of oily sludge discharging over the effluent weir. The system was again shutdown and personnel were dispatched to the River where a small oil sheen was discovered in the area of the cooling tower blowdown outfall. The sheen was reported to the Senior Nuclear Shift Supervisor for notification of response personnel and regulatory agencies. The sheen was reported to the NJDEPE Hotline, Case No. 94-03-24-1659-11, and the National Response Center, Case No. 231-592. The U. S. Coast Guard dispatched Petty Officer Michael Thompson to inspect the discharge and cleanup activities.

The oil sheen was limited by wind and wave action to a small area, approximately 20 feet by 30 feet, along the shoreline directly adjacent to the Hope Creek barge slip. Site Protection personnel immediately took action to place absorbant pads and boom in the area. Absorbant pads were also used to remove any oil trapped in the riprap along the shoreline. Cleanup activities were completed at approximately 7:30 p.m.

During the seven hours the LV&OW system was out of service to correct the petroleum hydrocarbon effluent violation, the water level in the separator dropped several inches due to a leaky influent check valve. As a result, the separator's oil/water interface reached the level of the effluent weir resulting in the oil discharge. The separator was taken apart and all oil was removed from the plate pack. The separator was then refilled with clean water and returned to service without incident at approximately 9:00 p.m. on March 25. A work order has been issued to repair/replace the leaky check valve.

PSE&G contends that the violation of petroleum hydrocarbon limit at the LV&OW system and the oil sheen from the cooling tower blowdown are interrelated and due to a single operational incident. In accordance with NJAC 7:14-8.5(b), these violations should be treated as a single effluent violation.

S. Mathis, NJDEPE
NLR-E94059

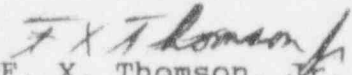
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For your information, PSE&G is providing a copy of the "Pollution Incident Witness Statement" prepared by Site Protection personnel who responded to the oil sheen.

If you have any questions or require additional information, please contact Pat McCabe of my staff at (609) 339-1245.

Sincerely,


F. X. Thomson, Jr.
Manager -
Licensing and Regulation

Attachment (1)

C Assistant Director of Enforcement
NJ Department of Environmental Protection and Energy
401 East State Street
CN 029
Trenton, NJ 08625-0029

Petty Officer Michael L. Thompson
U. S. Coast Guard
1 Washington Avenue
Philadelphia, PA 19147

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

U.S. Department
of Transportation
United States
Coast Guard



Commanding Officer
U.S. Coast Guard

1 Washington Ave.
Philadelphia Pa.
19147-4395
(215) 271-4800

PRIVACY ACT STATEMENT

The standard procedure in a pollution incident requires that the investigator collect all necessary information, including private information, to complete the pollution investigation case. As required by the Privacy Act, Title 5 U.S.C. 552a(e)(3), the investigator will:

- a. Inform you as to his authority to collect this information.
- b. Inform you as to the primary purpose of this information.

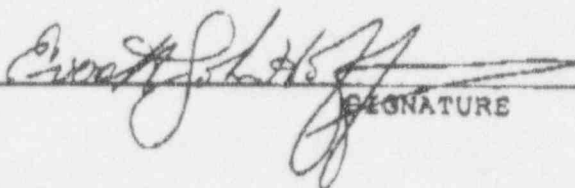
1. Authority

The investigator, as a Federal Law Enforcement Officer (14 U.S.C. 93(e) and E.O. 11735 of August 3, 1973) is requesting information pursuant to the authority contained in the Federal Water Pollution Control Act, as amended (33 U.S.C. 1321 et seq) and regulations written to enforce this law.

2. Principal Purpose

The statement you provide the investigator will be used to determine the cause of this pollution incident and establish the identity of the discharger. Private information collected by the investigator is necessary to enable him to contact you, if more information is needed or to clarify information already given. Your identity and contact information is needed in order to use your statement at the civil and sometimes criminal proceedings which may result from this investigation. There are no other uses intended for your private information. Disclosure of this information is strictly voluntary.

I HAVE READ AND UNDERSTAND THE ABOVE STATEMENT.


SIGNATURE

POLLUTION INCIDENT WITNESS STATEMENTDate/Time of incident: 03/19/2000 1640Date/Time of statement: 03/19/2000

1. When and where did you see the pollution incident occur? What was the waterbody?

Delaware River, New Jersey side, just north of the
Artificial Island Nuclear Complex

2. What kind of pollution was it and how much entered the water?

#2 Diesel oil (waste), approximately 5 to 10 gallons.

3. What did the pollution look like (e.g., rainbow sheen, sludge, etc.)?

Almost completely a rainbow sheen.

4. What was the source of the pollution and what caused it to enter the water?

An oily waste separator on the north side of the
island. Maintenance was being performed & accidentally
oil was blown & reached a blowdown pipe that discharges
to the river.

5. What actions were taken to stop, mitigate, or clean up the pollution? By whom?

When the oil was observed one of the waste separator's
maintenence work was ceased & mitigated. A pump & oil
stopped the blowdown line pipe & to the river. The site manager
was dispatched, deployed a boat with absorbent boom & cleaned up
what could be.

Name: Everett J. Hoffman, NPLS Phone: 609-339-2800

Address: P.O. Box 236
Hancock Bridge NJ
08038

Signature: 

On Scene Coordinator's Representative: Cmdr. Michael J. Thompson

Signature: 

U.S. Department of Transportation
United States Coast Guard



NOTICE OF FEDERAL INTEREST FOR
AN OIL POLLUTION INCIDENT

COMMANDING OFFICER

COMMANDING OFFICER
USCG MSO/GROUP OFFICE
1 WASHINGTON AVE.
PHILADELPHIA, PA 19147-4395
(215) 271-4800

PSG46 Hope Creek Cove Sta.

P.O. Box 236

Harrocks Bridge, NJ. 08038

24 MAR 94

Gentlemen:

On or about 1630 24 MAR 94, an oil pollution incident occurred or threatens to occur at Hope Creek Cove Sta., Harrocks Bridge, NJ. You may be financially responsible for that incident. Under Federal Statutes, the United States Government may take action to minimize or mitigate damage to the public health or welfare that is threatened or that may be caused by this incident.

Under the Oil Pollution Act of 1990, the responsible party is liable for, among other things, removal costs and damages resulting from this incident. The failure or refusal of the responsible party to provide all reasonable cooperation and assistance requested by the Federal On-Scene Coordinator (OSC) will eliminate any defense or entitlement to limited liability which otherwise might be available under the Act.

You are advised that your failure to properly carry out the removal of the discharge as ordered by the OSC or to comply with any administrative orders necessary to protect the public health and welfare, may subject you to additional penalties. For such failure, owners, operators, or persons in charge of the vessel or facility from which the oil is discharged are subject under the Federal Water Pollution Control Act (FWPCA), as amended, to a civil penalty of up to \$25,000 per day of violation or up to 3 times the costs incurred by the Oil Spill Liability Trust Fund. Should you require further information concerning this matter, please contact LTJG JOHN FLYNN at the above address and telephone number.

As long as the OSC determines that you are taking adequate actions in this matter, Federal removal action will usually be limited to monitoring the progress of your actions and providing guidance as necessary. Under the FWPCA, as amended, your response actions may be taken into account in determining the amount of any penalty assessed as a result of the discharge.

Sincerely,

[Signature]

Received and Acknowledged:

[Signature]

Witness(es):

[Signature]