



April 15, 1994

Ms. Mary Simmons, Enforcement Assistant U.S. Environmental Protection Agency Region 6 - 6W-EA 1445 Ross Avenue Dallas, Texas 75202-2733

Subject:

Permit Excursion, Oil and Grease Concentration, Outfall 002

Reference:

NPDES Permit LA0042731

File No.:

G1.11.7/RBG-40,501

Dear Ms. Simmons:

This letter is notification of a discharge permit excursion at Outfall 002 (effluent from a low volume wastewater treatment system) on April 4, 1994. A sample of effluent collected on April 4, 1994 was analyzed for oil and grease on April 11, 1994, indicating an effluent concentration of 24.6 mg/l. Our NPDES permit restricts this parameter to a daily maximum limit of 20 mg/l for effluent released from Outfall 002.

Our investigation indicates that the probable cause for this permit excursion was a lube oil purification system seal leak to a floor drain, which flows to this low volume wastewater treatment system. Effluent samples collected during March, 1994, for this treatment system averaged approximately 12 mg/l oil and grease, which is several times greater than historical values. The onset of these elevated oil and grease concentrations seems to coincide with the occurance of the seal leak observed during the first week of March, 1994.

Our corrective measures included inspecting floor drain sumps and picking up visible oil with absorbant materials. Two samples of effluent from this wastewater treatment system were collected and analyzed on April 13, 1994, with effluent concentrations of 0.7 and 1.0 mg/l oil and grease; the next sample was collected and analyzed on April 14, 1994 with 0.2 mg/l oil and grease, indicating the effectiveness of these measures. In order to prevent recurrance, we plan to reroute the lube oil purification system drain line so that it no longer communicates with the floor drain.

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Ms. Simmons April 15, 1994 G1.11.7 Page 2 of 2

I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Michael A. Harrington

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Environmental Supervisor

MAH/mh