



PECO ENERGY

PECO Energy Company
2301 Market Street
PO Box 8699
Philadelphia, PA 19101-8699
215 641 4000

May 23, 1994

Mr. Sohan Garg
Department of Environmental Resources
Suite 6010, Lee Park
555 North Lane
Conshohocken, PA 19428

Dear Mr. Garg:

Subject: Limerick Generating Station NPDES Permit No. PA0051926

The following information is being provided, as per your request, to update the subject NPDES permit application. Also enclosed is evidence of municipal and county notification and a check (No. 158544) in the amount of \$500.00 to cover the permit application fee.

1. We would like the functional description of the holding pond (monitoring point 201) to be changed to read: "Non-hazardous/industrial wastes generated as part of routine plant operations, testing, and maintenance, including, at a minimum, plant cooling water, closed cooling water (sodium nitrite/nitrate), mop/wash water, stand-by liquid control system test water (residual sodium pentaborate and demineralized water), rainwater, approved treatment chemicals, and chemical reagents/products utilized in the site chemistry labs. Holding pond discharge to outfall 001 can be either a batch or continuous process." Please note that this does not reflect a change in plant operations or conditions. The listed processes were in place during the last permit application and the subsequent effluent characterization. We feel this description better details the processes involved.

In addition, concerning the question of the water treatment plant discharge and regenerative wastes, the only wastewater going to the holding pond from the water treatment plant are from the clarification process. No regenerative wastes are discharged to the holding pond. Also, no photographic wastes are discharged to the holding pond. Photographic wastes were contained in the original description of the holding pond due to activities occurring during the construction of the plant. Please remove photographic waste from the holding pond description.

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2. The Laundry Drain System functional description should be described as receiving the same types of wastes as described for the holding pond.
3. Outfall 021 collects stormwater runoff, however, due to cooling tower drift, cooling tower basin leakage, and cooling tower weir screen cleaning, treated cooling water also enters the outfall. Due to the nature of this discharge, the flow volume would vary and is often zero. On average, the expected discharge would be 5,000 gallons per day, with a maximum discharge rate of 150,000 gallon per day (this only occurs just before start-up until the tower basin expands due to plant heat). This effluent would be of the same character as water discharged from outfall 001.
4. Stormwater outfalls at the site are to be grouped as follows, based on drainage area similarities. Groups 1 and 2 are stormwater outfalls associated with industrial activities. One outfall from Group 1 and one outfall from Group 2 will be sampled on a yearly basis.

Group 1 - 006, 007, 008 and 009.

Group 2 - 002, 003, 004, 005 012, and 022.

Group 3 - 013, 014, 015, 016, 017, 018, 019. This group of outfalls consist of stormwater only and are not associated with an industrial activity.

5. Although no discharge from the sewage treatment plant has occurred over the past five years, we would like to leave the discharge (and the subsequent internal monitoring point) in the permit for potential use of the plant in the future.
6. The following information is provided concerning fire protection system testing and affected stormwater outfalls. The testing is performed as per various fire protection standards. Note, due to the low volumes of water, many of the listed discharges would not normally reach an outfall.

a) Sprinkler System Flow Tests

Each site building sprinkler system is tested yearly. Each test will flow approximately 40 gpm for five minutes. The number of tests will depend on the overall number of site buildings and the schedule for those tests.

Currently, the number of tests and nearest outfall are as follows:

<u>Nearest Outfall</u>	<u>Number of Tests</u>
003	6
005	3
006	2
007	2
008	2
009	2
018	1
021	2

In addition, the Limerick Training Center is tested, with no designated outfall.

b) Fire Hydrant Flow/Flush Test

Each site fire hydrant is flushed with cooling tower water at approximately 1,500 gpm for five minutes yearly.

The current number of tests and the nearest outfall is as follows:

<u>Nearest Outfall</u>	<u>Number of Tests</u>
002	1
003	5
004	1
005	5
013	1
014	1
018	1
021	1

In addition, two hydrants at Limerick Training Center and one at the Information Center are tested with no designated outfall.

c) Fire Main Flush Tests

Once per year, approximately 10,000 gallons of cooling tower water is flushed towards outfalls 003 and 009.

d) Fire Main Flow Test

Once per year, approximately 60,000 gallons of cooling tower water is sprayed through deluge guns in the general vicinity of outfall 003 and 009.

e) Fire Pump Flow Test

These tests are conducted yearly.

<u>Test</u>	<u>Gallons</u>	<u>Receiving Outfalls</u>
Motor Driven Pump	66,000	002 or 005
Diesel Driven Pump	66,000	009 or 003

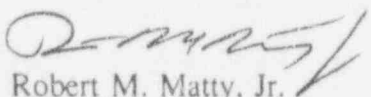
f) Transformer Deluge Test

Each site transformer is tested yearly at approximately 1,500 gpm for seven minutes. Most are diked, with waste being routed to the holding pond. Two transformers in the 200 kV yard are not diked, and the nearest outfall is 009. Three transformers are located in the 500 kV yard--two are diked. There is no designated outfall.

A copy of this letter (including any attachments or enclosures) is being sent to the U.S. Nuclear Regulatory Commission (USNRC) in accordance with the Limerick Generating Station, Units 1 and 2, Environmental Protection Plan, Section 3.2, which stipulates that USNRC shall receive a copy of any proposed changes to the NPDES permit at the same time that the permitting agency is notified.

If you have any questions or require additional information, please contact me at (215) 841-5177.

Sincerely,


Robert M. Matty, Jr.
Engineer
Environmental Affairs

Attachment

cc: U.S. Nuclear Regulatory Commission, Document Control Desk ✓
(Docket Nos. 50-352 and 50-353 & License Nos. NPF-39 and NPF-85)
T. T. Martin, Administrator, USNRC, Region 1
N. S. Perry, USNRC Senior Resident Inspector, LGS



PECO ENERGY

PECO Energy Company
2301 Market Street
PO Box 8699
Philadelphia, PA 19101-8699
215 841-4000

April 20, 1994

Mr. Mark John
Code Office
Limerick Township Municipal Building
646 West Ridge Pike
Limerick, PA 19468

Dear Mr. John:

Pursuant to PA Act 14, P.L. 834, we hereby notify you that PECO Energy Company will be filing with the Pennsylvania Department of Environmental Resources (PaDER) for renewal of an NPDES Discharge Permit at our Limerick Generating Station. Renewal of the permit is required for continuing the discharge of waste water and storm water from the plant to the Schuylkill River.

If you have any questions, please contact Robert M. Matty, Jr. at (215) 841-5177.

Sincerely,

George M. Morley
Director
Environmental Affairs

bcc: J. W. Durham
D. R. Helwig
R. W. Boyce
J. A. Muntz
G. A. Hunger
E. J. Cullen
W. F. McElroy
J. L. Kantner
D. P. Helker
K. S. Kemper
CCD



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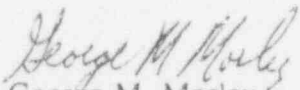
Mr. Nicholas Melair
Montgomery County Commissioners Office
Montgomery County Court House
Norristown, PA 19404

Dear Mr. Melair:

Pursuant to PA Act 14, P.L. 834, we hereby notify you that PECO Energy Company will be filing with the Pennsylvania Department of Environmental Resources (PaDER) for renewal of an NPDES Discharge Permit at our Limerick Generating Station. Renewal of the permit is required for continuing the discharge of waste water and storm water from the plant to the Schuylkill River.

If you have any questions, please contact Robert M. Matty, Jr. at (215) 841-5177.

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George M. Morley

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