Dake Power Company Catawba Nuclear Station 4800 Concord Road York, SC 29745



DUKE POWER

October 5, 1995

Mr. Steve Spigner South Carolina Dept. of Health and Environmental Control P.O. Box 100, Ft. Lawn, SC 29741

Subject: Response to SCDHEC Air permit Inspection File No.: 700.08

Dear Mr. Spigner:

This letter is to confirm our phone conversation of yesterday, concerning the response of the Catawba Site to the SCDHEC Air permit inspection of Sept. 18, 1995. That inspection was conducted by Mr. Brian Burgess of SCDHEC. From that inspection, there were two action items for the Catawba Site:

1. Set up a system to monitor Communications Diesel run hours monthly.

2. Set up a "rolling 12-month total" of diesel engine run times and VOC emissions.

While reviewing our operating permit, (2440-0070), a point of confusion arose. Our operating permit limits us to 75 tons per year of VOC's emitted, but does not make specific reference to the paint spray booths at our on-site painting facility. Instead, the paint spray booths are covered by construction permits 2440-0070-CA and 2440-0070-CB, which limit the run hours, opacity and particulate matter. (According to Dennis Hairston of Duke-ESS, Catawba's operating permit is being revised to include the spray booths. The 75 ton limit was established to include all site activities, including the paint spray booths.)

I discussed this matter with John Hiers, the Permitting Engineer. It was his recommendation that we account for all VOC's emitted on site on a monthly basis. (He also recommended that if the spray booth run hours limit presents a problem, we could deal with that as a separate issue.)

The Catawba Site intends to follow the recommendation to monitor total VOC's emitted on site on a monthly basis, and to keep a "rolling 12-month total" to ensure compliance with the yearly limit. However, in order to properly set up the database, we will need additional time beyond the original 10-6-95 due date.

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As agreed to in our conversation yesterday, it is the Catawba Site's intention to have a system in place to monitor all VOC's emitted on site by 10-27-95.

Sincerely,

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Thomas E. Cook, Engineer Catawba Site Environmental Management

cc:

Al Williams, SCDHEC - Catawba District
John Hiers, SCDHEC Permitting
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