



PECO ENERGY

PECO Energy Company
2301 Market Street, S21-2
PO Box 8699
Philadelphia, PA 19101-8699
215 841 5030

September 1, 1998

Mr. Sohan Garg
Department of Environmental Protection
Water Management Program
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

Dear Mr. Garg:

Subject: Limerick Generating Station NPDES Permit No. PA0051926

This letter is being sent to request that the subject permit be amended by adding the BetzDearborn chemical additive Spectrus BD1500 to Part C of the permit. The additive will be used for controlling algae growth in the cooling water system.

Spectrus BD1500 is a water-based deposit control agent. The treatment schedule for each unit is expected to be once per day, twice a week. However, in order to more effectively control algae, it may be necessary to initially treat each unit twice per day. Usage rate of the additive will be 466 pounds per treatment. We are requesting that the additive be permitted for a maximum usage rate of 2500 pounds per day. The expected concentration at the outfall is 8 ppm as product and 1.2 ppm as active. Enclosed is a copy of the MSDS and aquatic toxicity data for the product.

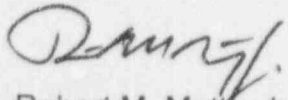
A copy of this letter (including any attachments or enclosures) is being sent to the U.S. Nuclear Regulatory Commission (USNRC), in accordance with the Limerick Generating Station, Units 1 and 2, Environmental Protection Plan, Section 3.2, which stipulates that the USNRC shall receive a copy of any proposed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

120175

9809090022 980901
PDR ADOCK 05000352
P PDR

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)
H. J. Miller, Administrator, USNRC, Region 1
USNRC Senior Resident Inspector, LGS



August 31, 1998

BetzDearborn Water Management Group
 Neshaminy Plaza II
 3070 Bristol Pike, Suite 201
 Bensalem, PA 19020-5361
 (800) 646-5510
 (215) 245-4622 (Fax)

Mr. David Piller
 PECO Nuclear
 Limerick Generating Station
 Evergreen and Sanatoga Roads
 Sanatoga, PA 19464

Subject: State Approval (Spectrus BD1500)

Dear Dave:

The use Spectrus BD1500 at Limerick Generating Station is dependent upon state approval. The Material Safety Data Sheet is included with this letter. Included in the MSDS is the Aquatic Toxicology information. The estimated usage for each unit is 55 gallons per shot dosage. This equals 466 pounds of product. This is expected to be the average usage rate per treatment. Initially, the treatment will be fed once per day, twice per week. The ppm feedrate is dependent on demand and is expected to be 8 ppm as product and 1.2 ppm as active. Spectrus BD1500 is a 15% active solution. We would like to request that the permit allows us to feed 2500 pounds of product per day.

Thank You for the opportunity to serve PECO Nuclear - Limerick Generating Station.

Very Truly Yours,

A handwritten signature in cursive script that reads 'Daryl Coupe'.

Daryl Coupe
 Technical Specialist
 BetzDearborn Water Management Group

Post-it® Fax Note		7871	Date	# of pages ▶
To	Bob Klaty		From	
Co./Dept.			Co.	
Phone #			Phone #	
Fax #			Fax #	

BETZDEARBORN MATERIAL
SAFETY DATA SHEET

EFFECTIVE DATE: 14-JUL-1997

PRINTED DATE: 31-AUG-1998

1) CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME : SPECTRUS BD1500

PRODUCT APPLICATION AREA: WATER-BASED DEPOSIT CONTROL AGENT.

COMPANY ADDRESS:

BetzDearborn Inc.

4636 Somerton Road, Trevoise, Pa. 19053

Information phone number: (215) - 355-3300

EMERGENCY TELEPHONE (HEALTH/ACCIDENT): (800)-877-1940 (USA)

2) COMPOSITION / INFORMATION ON INGREDIENTS

Information for specific product ingredients as required by the U.S. OSHA HAZARD COMMUNICATION STANDARD is listed. Refer to additional sections of this MSDS for our assessment of the potential hazards of this formulation.

HAZARDOUS INGREDIENTS:

This product is not hazardous as defined by OSHA regulations.

No component is considered to be a carcinogen by the National Toxicology Program, the International Agency for Research on Cancer, or the Occupational Safety and Health Administration at OSHA thresholds for carcinogens.

PAGE 1

CONTINUED

PRODUCT NAME : SPECTRUS BD1500

EFFECTIVE DATE: 14-JUL-1997

3) HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

CAUTION

May cause slight irritation to the skin. May cause moderate irritation to the eyes. Mists/aerosols may cause irritation to upper respiratory tract.

DOT hazard is not applicable
Emergency Response Guide is not applicable
Odor: Slight; Appearance: Colorless, Liquid

Fire fighters should wear positive pressure self-contained breathing apparatus(full face-piece type). Proper fire-extinguishing media: dry chemical, carbon dioxide, foam or water

POTENTIAL HEALTH EFFECTS

ACUTE SKIN EFFECTS:

Primary route of exposure; May cause slight irritation to the skin.

ACUTE EYE EFFECTS:

May cause moderate irritation to the eyes.

ACUTE RESPIRATORY EFFECTS:

Mists/aerosols may cause irritation to upper respiratory tract.

INGESTION EFFECTS:

May cause slight gastrointestinal irritation.

TARGET ORGANS:

No evidence of potential chronic effects.

MEDICAL CONDITIONS AGGRAVATED:

Not known.

SYMPTOMS OF EXPOSURE:

May cause redness or itching of skin.

PAGE 2

CONTINUED

PRODUCT NAME : SPECTRUS BD1500

EFFECTIVE DATE: 14-JUL-1997

4) FIRST AID MEASURES

SKIN CONTACT:

Remove contaminated clothing. Wash exposed area with a large quantity of soap solution or water for 15 minutes.

EYE CONTACT:

Immediately flush eyes with water for 15 minutes. Immediately contact a physician for additional treatment.

INHALATION:

Remove victim from contaminated area to fresh air. Apply appropriate first aid treatment as necessary.

INGESTION:

Do not feed anything by mouth to an unconscious or convulsive victim. Do not induce vomiting. Immediately contact physician. Dilute contents of stomach using 3-4 glasses milk or water.

5) FIRE FIGHTING MEASURES

FIRE FIGHTING INSTRUCTIONS:

Fire fighters should wear positive pressure self-contained breathing apparatus (full face-piece type).

EXTINGUISHING MEDIA:

dry chemical, carbon dioxide, foam or water

HAZARDOUS DECOMPOSITION PRODUCTS:

Thermal decomposition (destructive fires) yields elemental oxides.

FLASH POINT:

> 200F SETA(CC)

6) ACCIDENTAL RELEASE MEASURES

PROTECTION AND SPILL CONTAINMENT:

Ventilate area. Use specified protective equipment. Contain and absorb on absorbent material. Place in waste disposal container.

Flush area with water. Wet area may be slippery. Spread sand/grit.

DISPOSAL INSTRUCTIONS:

Water contaminated with this product may be sent to a sanitary sewer treatment facility, in accordance with any local agreement, a permitted waste treatment facility or discharged under a permit. Product as is - Incinerate or land dispose in an approved landfill.

7) HANDLING AND STORAGE

HANDLING:

Alkaline. Do not mix with acidic material.

STORAGE:

Keep containers closed when not in use. Reasonable and safe chemical storage.

PAGE 3

CONTINUED

PRODUCT NAME : SPECTRUS BD1500

EFFECTIVE DATE: 14-JUL-1997

8) EXPOSURE CONTROLS/PERSONAL PROTECTION

EXPOSURE LIMITS

This product is not hazardous as defined by OSHA regulations.

ENGINEERING CONTROLS:

adequate ventilation

PERSONAL PROTECTIVE EQUIPMENT:

Use protective equipment in accordance with 29CFR 1910 Subpart I

RESPIRATORY PROTECTION:

A RESPIRATORY PROTECTION PROGRAM THAT MEETS OSHA'S 29 CFR 1910.134 AND ANSI Z88.2 REQUIREMENTS MUST BE FOLLOWED WHENEVER WORKPLACE CONDITIONS WARRANT A RESPIRATOR'S USE.

USE AIR PURIFYING RESPIRATORS WITHIN USE LIMITATIONS ASSOCIATED WITH THE EQUIPMENT OR ELSE USE SUPPLIED AIR-RESPIRATORS.

If air-purifying respirator use is appropriate, use a respirator with dust/mist filters.

SKIN PROTECTION:

rubber gloves— Wash off after each use. Replace as necessary.

EYE PROTECTION:

splash proof chemical goggles

9) PHYSICAL AND CHEMICAL PROPERTIES

Specific Grav. (70F)	1.020	Vapor Pressure (mmHG)	18.0
Freeze Point (F)	31.00	Vapor Density (air=1)	< 1.00
Viscosity (cps 70F)	30	% Solubility (water)	100.0

Odor	Slight
Appearance	Colorless
Physical State	Liquid

Flash Point (F) > 200 SETA(CC)
pH As Is (approx.) 12.5
Evaporation Rate (Ether=1) < 1.00

NA = not applicable ND = not determined

PAGE 4

CONTINUED

PRODUCT NAME : SPECTRUS BD1500

EFFECTIVE DATE: 14-JUL-1997

10) STABILITY AND REACTIVITY

STABILITY:

Stable under normal storage conditions.

HAZARDOUS POLYMERIZATION:

Will not occur.

INCOMPATIBILITIES:

May react with strong oxidizers.

DECOMPOSITION PRODUCTS:

Thermal decomposition (destructive fires) yields elemental oxides.

BETZ INTERNAL PUMPOUT/CLEANOUT CATEGORIES:

"A"

11) TOXICOLOGICAL INFORMATION

Oral LD50 RAT: >2,000 mg/kg

NOTE - Estimated value

Dermal LD50 RABBIT: >2,000 mg/kg

NOTE - Estimated value

12) ECOLOGICAL INFORMATION

AQUATIC TOXICOLOGY

Rainbow Trout 48 Hour Static Screen

0% Mortality: 1000 mg/L

Daphnia magna 48 Hour Static Screen

0% Mortality: 500 mg/L

Menidia beryllina (Silversides) 96 Hour Static Acute Bioassay

0% Mortality: 5000 mg/L

Mysid Shrimp 96 Hour Static Acute Bioassay

25% Mortality: 5000 mg/L

No Effect Level: 2500 mg/L

BIODEGRADATION

COD (mg/gm): 334 Calculated

TOC (mg/gm): 80 Calculated

BOD-5 (mg/gm): 4 Calculated

BOD-28 (mg/gm): 5 Calculated

PAGE 5

CONTINUED

PRODUCT NAME : SPECTRUS BD1500

EFFECTIVE DATE: 14-JUL-1997

13) DISPOSAL CONSIDERATIONS

If this undiluted product is discarded as a waste, the US RCRA hazardous waste identification number is :
D002=Corrosive(pH).

Please be advised; however, that state and local requirements for waste disposal may be more restrictive or otherwise different from federal regulations. Consult state and local regulations regarding the proper disposal of this material.

14) TRANSPORT INFORMATION

DOT HAZARD: Not Applicable
UN / NA NUMBER: Not applicable
DOT EMERGENCY RESPONSE GUIDE #: Not applicable

15) REGULATORY INFORMATION

TSCA:

All components of this product are listed in the TSCA inventory.

CERCLA AND/OR SARA REPORTABLE QUANTITY (RQ):

No regulated constituent present at OSHA thresholds

SARA SECTION 312 HAZARD CLASS:

Product is non-hazardous under Section 311/312
 SARA SECTION 302 CHEMICALS:
 No regulated constituent present at OSHA thresholds
 SARA SECTION 313 CHEMICALS:
 No regulated constituent present at OSHA thresholds

CALIFORNIA REGULATORY INFORMATION

CALIFORNIA SAFE DRINKING WATER AND TOXIC
 ENFORCEMENT ACT (PROPOSITION 65) CHEMICALS PRESENT:

No regulated constituent present at OSHA thresholds

MICHIGAN REGULATORY INFORMATION

No regulated constituent present at OSHA thresholds

PAGE 6

CONTINUED

PRODUCT NAME : SPECTRUS BD1500

EFFECTIVE DATE: 14-JUL-1997

16) OTHER INFORMATION

NFPA/HMIS

CODE TRANSLATION

Health	1	Slight Hazard
Fire	1	Slight Hazard
Reactivity	0	Minimal Hazard
Special	ALK	pH above 12.0
(1) Protective Equipment	B	Goggles, Gloves

(1) refer to section 8 of MSDS for additional protective equipment recommendations.

CHANGE LOG

EFFECTIVE

DATE REVISIONS TO SECTION: SUPERCEDES

MSDS status: 14-JUL-1997

** NEW **