

H. B. ROBINSON STEAM ELECTRIC PLANT
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
PERMIT NO. SC0002925
SEPTEMBER 1997

Report required by National Pollutant Discharge Elimination System (NPDES)
Permit No. SC0002925, Part II.B.3, "Other Non-Compliance"

Non-Compliance

As stated in NPDES Permit No. SC0002925, Internal Outfall 006, "Low Volume Wastes and Chemical Metal Cleaning Wastes from the Radwaste System," the Oil and Grease monthly average limitation is 15.0 mg/l. The September 24, 1997, sample results indicated that the monthly average limitation was exceeded for Internal Outfall 006.

Description of Non-Compliance

There were two discharges from Internal Outfall 006 for the month of September and both were on September 24, 1997. The results of sample analyses from the two discharges indicated an Oil and Grease concentration of 34.9 mg/l and <1.0 mg/l with a calculated monthly average of 17.4 mg/l. Initial investigation of this event indicates that the low volume wastes processing was not completely effective. If the Oil and Grease samples had been analyzed prior to release of the low volume wastes, the low volume wastes could have been reprocessed through the demineralizer and charcoal beds. However, previous Discharge Monitoring Report (DMR) data and the consistent nature of the previous discharges indicated that there was no need to analyze Oil and Grease samples prior to discharge. Since there were no other discharges from Internal Outfall 006 for the month, additional samples could not be acquired. The number of sample measurements during the monitoring period that exceed the maximum permit requirement is indicated in the "NO EX" (number of exceptions) block. In addition, the Oil and Grease results have been reported on the September DMR with an annotation and explanation in the comment section.

Steps Being Taken to Reduce, Eliminate, and Prevent Recurrence

Routinely, NPDES samples will be analyzed for Oil and Grease prior to release of the low volume wastes from Outfall 006. The guidance will be added to Environmental Monitoring Procedure (EMP) - 006, "NPDES Program," by December 15, 1997. Until that time, a Night Order has been issued to administratively control the guidance for NPDES sample analysis.

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PDR ADOCK 05000261
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