



PECO ENERGY

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

April 23, 1996

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

Dear Mr. Garg:

Subject: Limerick Generating Station NPDES Permit No. PA0051926
Chemical Additive Betz Deposi-Trol 855D

As per our recent telephone conversations, we are requesting that the chemical additive Betz Deposi-Trol 855D be added to Limerick Generating Station's NPDES Permit. The product was originally approved by the Department in 1992 (see attached approval letter). However, it was not included in the new permit issued January 1, 1995. The product was approved as a developmental product, Betz DE-1579. Betz has since renamed the product to Deposi-Trol 855D. There is no change in the chemical properties (see attached Betz letter).

In addition, the original approval contained the condition that during use of the product, outfall 001 shall be sampled for total iron and dissolved iron. The concentrations of the metals are not to exceed 1.5 mg/l and 0.3 mg/l, respectively. We are requesting that the monitoring condition for total and dissolved iron be moved from outfall 001 to the emergency spray pond discharge. Since the additive will be discharged through the spray pond, monitoring at the pond discharge (prior to mixing with cooling tower blowdown) will provide better data concerning iron levels that result due to use of the product. Also, due to varying levels of iron in the river, the specified limits may be exceeded at outfall 001 with no direct correlation to the use of the additive or plant operations.

Enclosed is a copy of the Material Safety Data Sheets (MSDS) and the Aquatic Toxicity Data for the product. At this time, there is a need to treat an emergency diesel generator cooling system with the chemical additive. Since this product has been previously approved, we would appreciate your immediate attention to this matter.

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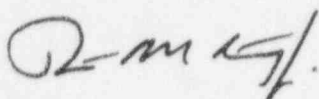
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cooling

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.

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



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

FIELD OPERATIONS - WATER QUALITY MANAGEMENT
Suite 6010, Lee Park
555 North Lane
Conshohocken, PA 19428
215 832-6130

RECEIVED
SEP 2 1992

G. M. MORLEY

RMM

August 31, 1992

Mr. George M. Morley
Director, Environmental Affairs
Philadelphia Electric Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101

Re: IW NPDES Permit No. PA0051926
Limerick Generating Station
Limerick Township
Montgomery County

Dear Mr. Morley:

This is in response to your June 12, 1992 letter requesting an approval to use chemical additive Betz DE-1579 for the cleaning of a heat exchanger tube at the Limerick Generating Station.

We have completed our review and hereby approve your request. The wastewater will continue to discharge on an average rate of 14.27 million gallons per day to the Schuylkill River through Outfall 001. The approval is subject to the following conditions:

1. The approved additive and usage rate are as follows:

<u>Name</u>	<u>Usage Rate (gallons/day)</u>
Betz DE-1579	600

2. Discharges containing chemical additives to control corrosion, sealing, algae, slime, fouling, oxygen, etc., shall be managed by the permittee to ensure that toxic effects in the receiving stream are prevented. Usage rates shall be limited to the minimum amount necessary to accomplish the intended purposes of chemical addition.
3. Accurate records of usage (name of additive, quantity added, date added) of the approved chemical additive and blow down discharge volumes must be maintained and kept onsite by the permittee.
4. Outfall 001 shall be sampled and analyzed daily for total iron and dissolved iron, the concentrations for these metals shall not exceed 1.5 mg/l and 0.3 mg/l respectively.



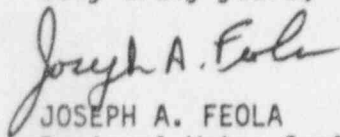
Mr. George M. Morley
August 31, 1992

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The existing NPDES Permit will be revised to include this approval once our review of the permit renewal application is completed.

If you have any questions, please feel free to contact Sohan Garg of our Permits Section.

Very truly yours,



JOSEPH A. FEOLA
Regional Water Quality Manager

cc: Limerick Generating Station
Limerick Township
EPA
DRBC
Permits & Compliance
Re 30 (SH)230.8

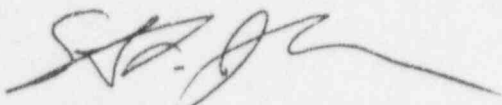
April 22, 1996

Mr. Dave Piller
PECO Energy Company
Limerick Generating Station
Evergreen & Sanatoga Roads
Sanatoga, PA 19464

Dear Dave,

This is to confirm that Betz DE1579, which was a developmental cleaning product, was renamed to Betz 855D upon upgrade to full "product" status. There is no difference what so ever in the chemical properties of these two products.

Sincerely,



Steve Jordan
Area Manager
Delaware Valley District

**BETZ MATERIAL
SAFETY DATA SHEET****BETZ**

EFFECTIVE DATE: 29-AUG-1995

PRINTED DATE: 09-APR-1996

1) CHEMICAL PRODUCT AND COMPANY IDENTIFICATION**PRODUCT NAME : DEPOSI-TROL 855D****PRODUCT APPLICATION AREA: CHEMICAL CLEANING COMPOUND.****COMPANY ADDRESS:**

Betz Water Management Group, Division Betz Laboratories, Inc.
200 Witmer Road Horsham, PA 19044
Information phone number (215) 773-6131

EMERGENCY TELEPHONE (HEALTH/ACCIDENT): (800)-877-1940 (USA)**2) COMPOSITION / INFORMATION ON INGREDIENTS**

Information for specific product ingredients as required by the OSHA HAZARD COMMUNICATIONS STANDARD is listed. Refer to additional sections of this MSDS for our assessment of the potential hazards of this formulation. This product is subject to the Pennsylvania and New Jersey Worker and Community Right to Know Law.

HAZARDOUS INGREDIENTS:

CAS#

CHEMICAL NAME

TRADE SECRET INGREDIENT(E195);TSRN 125438 - 5118P
Irritant (eyes)

TRADE SECRET INGREDIENT(122);;TSRN 125438 - 5214P
Potential irritant (eyes)

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 Pennsylvania thresholds for carcinogens.

PRODUCT NAME : DEPOSI-TROL 855D

EFFECTIVE DATE: 29-AUG-1996

NON-HAZARDOUS INGREDIENTS:

CAS#

CHEMICAL NAME

7732-18-5

WATER

TRADE SECRET (NK55) TSRN: 125438 - 5628P

PRODUCT NAME : DEPOSI-TROL 855D

EFFECTIVE DATE: 29-AUG-1995

3) HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

WARNING

May cause slight irritation to the skin. Severe irritant to the eyes. Vapors, gases, mists and/or aerosols cause irritation to the upper respiratory tract.

DOT hazard: Corrosive to steel

Emergency Response Guide #

Odor: Pungent; Appearance: Colorless To Green, 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:

Severe irritant to the eyes.

ACUTE RESPIRATORY EFFECTS:

Primary route of exposure; Vapors, gases, mists and/or aerosols cause irritation to the upper respiratory tract.

INGESTION EFFECTS:

May cause slight gastrointestinal irritation with possible nausea, vomiting, diarrhea, incoordination, mental confusion, dizziness and lethargy.

TARGET ORGANS:

Prolonged or repeated exposures may cause primary irritant dermatitis and/or toxicity to the lung.

MEDICAL CONDITIONS AGGRAVATED:

Not known.

SYMPTOMS OF EXPOSURE:

Inhalation may cause irritation of the respiratory tract. Skin contact may cause itching and/or redness.

PRODUCT NAME : DEPOSI-TROL 855D

EFFECTIVE DATE: 29-AUG-1995

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 P-M(CC)

MISCELLANEOUS:

Corrosive to steel

UN1760, Emergency Response Guide #

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:

PRODUCT NAME ; DEPOSI-TROL 855D

EFFECTIVE DATE: 29-AUG-1995

8) EXPOSURE CONTROLS/PERSONAL PROTECTION**EXPOSURE LIMITS****CHEMICAL NAME**

TRADE SECRET INGREDIENT(E195);TSRN 125438 - 5118P

PEL (OSHA): NOT DETERMINED

TLV (ACGIH): NOT DETERMINED

TRADE SECRET INGREDIENT(122);TSRN 125438 - 5214P

PEL (OSHA): NUISANCE DUST

TLV (ACGIH): 5 MG/M3

MISC: Note: manufacturer's recommended exposure limit: 10 mg/m3.

ENGINEERING CONTROLS:

Adequate ventilation to maintain air contaminants below exposure limits.

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:

Neoprene gloves. Wash off after each use. Replace as necessary.

EYE PROTECTION:

Splash proof chemical goggles.

9) PHYSICAL AND CHEMICAL PROPERTIES

Specific Grav. (70F)	1.070	Vapor Pressure (mmHG)	~ 36.0
Freeze Point (F)	27.00	Vapor Density (air=1)	< 1.00
Viscosity (cps 70F)	9	% Solubility (water)	100.0

Odor	Pungent
Appearance	Colorless To Green
Physical State	Liquid
Flash Point (F)	> 200 P-M(CC)
pH As Is (approx.)	1.4
Evaporation Rate (Ether=1)	< 1.00

PRODUCT NAME : DEPOSI-TROL 855D

EFFECTIVE DATE: 29-AUG-1995

10) STABILITY AND REACTIVITY

STABILITY:

Stable

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:

"B"

11) TOXICOLOGICAL INFORMATION

Oral LD50 RAT:

6,829 mg/kg

Dermal LD50 RABBIT:

>5,000 mg/kg

NOTE - Estimated value

12) ECOLOGICAL INFORMATION

AQUATIC TOXICOLOGY

Fathead Minnow 96 Hour Static Screen

0% Mortality: 1500 mg/L

Daphnia magna 48 Hour Static Screen

0% Mortality: 1000 mg/L.

BIODEGRADATION

No Data Available.

13) DISPOSAL CONSIDERATIONS

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

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.

PRODUCT NAME : DEPOSI-TROL 855D**EFFECTIVE DATE: 29-AUG-1995**

14) TRANSPORT INFORMATION

DOT HAZARD: Corrosive to steel
UN / NA NUMBER: UN1760
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):

11,224 gallons due to (122);

SARA SECTION 312 HAZARD CLASS:

Immediate(acute);Delayed(Chronic)

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

PRODUCT NAME : DEPOSI-TROL 855D

EFFECTIVE DATE: 29-AUG-1995

16) OTHER INFORMATION

NFPA/HMIS

CODE TRANSLATION

Health	2	Moderate Hazard
Fire	1	Slight Hazard
Reactivity	0	Minimal Hazard
Special	CORR	DOT corrosive
(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: 22-AUG-95

REVISED FORMAT