

OPERATING PROCEDURE RAINWATER DISPOSAL

APPLICATION

Evaluating and disposing of rainwater collected in secondary containment structures. Following a rain storm, it must be determined whether liquid found in a secondary containment structure open to precipitation can be considered only rainwater and disposed of accordingly. If liquid thought to be rainwater is discovered in a secondary containment structure, a thorough inspection of the system must be performed to determine whether the liquid is rainwater or is the result of a spill from the tank system, containers, or oil-filled equipment.

EH&S will notify the Maintenance Supervisor after 3 in. of rainfall.

SPECIAL INSTRUCTIONS

- **Special skills required:** Up-to-date training in spill prevention control countermeasures (SPCC).
- Personnel scheduled to perform this procedure: Plant Maintenance Technicians are responsible for all secondary containments.

WORK STEPS

1. Possible contaminants for each secondary containment structure are listed in the information table accompanying this procedure. Review before examining secondary containments.
2. Check for any evidence of rainwater contamination (e.g., color, clarity, odor, oil sheen). IF there is no evidence of contamination, go to step 3. IF there is evidence of contamination, go to step 5. Record results in the rainwater disposal log.
3. IF there is no evidence of rainwater contamination or a release from tank system, release rainwater from containment onto ground, or pump or drain it into storm water system. If rainwater is drained through a berm drain, replace the drain cap and shut and lock the drain valve after discharging the rainwater.
4. Record discharge and operator name and signature in the Rainwater Disposal log.
 - Record must include:
 - Time and date of discharge
 - Tank/equipment identification, location, and contents
 - Results of visual inspection of contents
 - Records must be kept for at least three years and be made available for review at request of EH&S or regulatory personnel.
5. IF there is evidence of rainwater contamination, follow steps 6 - 11 below. IF hazardous constituents are present, immediately initiate spill response procedures and notify EH&S (Step 10).
6. Check for visual or audio alarms on equipment.
7. Check leak monitoring equipment, overfill protection devices, and spill prevention devices for signs of system malfunctions.
8. Check tank(s), drum(s), piping, pump(s), valve(s), and joints for signs of leakage (e.g., drips, stains, wet spots, cracks, bulges).
9. Check level in tank(s) or drum(s) for unexplained level changes or exceptionally high level(s).
10. Record inspection results, EH&S notification, and signature in the Rainwater Disposal Log.
11. Notify EH&S (x5251) of rainwater contamination. IF inspection is inconclusive, an EH&S representative must sample and analyze the liquid, which must be disposed of properly based on results.

12. If applicable, an EH&S representative must record the results of chemical analysis and final disposition of contaminated rainwater. The Facilities Maint Supt and an authorized EH&S representative must sign log sheets regarding contaminated rainwater.

INFORMATION TABLE			
Secondary Containment	Possible Contaminants	Release By	Location of Valves or Pump
Bldg 6 Transformer Pad Lower Sump	Transformer oil No PCBs	Portable trash pump to be installed	East end of the Bldg.
Bldg 6 Transformer Pad Upper Sump	Transformer oil No PCBs	1 locked valve	East end of the Bldg
Bldg 25, Bank 14	Transformer oil	Locked valve	
Bldg 27, Transformer CTS-HVPS- 1, Sump	Transformer oil No PCB	1 valve	Northwest corner of containment pad.
Bldg 37, Bank 218	Transformer oil	Locked valve	Upper pad
Bldg 46 So. End, Bank 49 Sump	Silicone transformer oil No PCBs	Portable trash pump to be installed	
Bldg 50, Bank 25 Pad Sump	Transformer oil No PCBs	Pump	West end of containment pad.
Bldg 58, Bank 36 & 158	Possible PCBs to 7 ppm		Locked valve bottom of containment sump
Bldg 62, Bank 66	Possible PCBs up to 6 ppm	Locked valve	
Bldg 66, Bank 215	Transformer oil	Locked valve	
Bldg 69 Sub	Silicone transformer oil No PCBs.	1 locked valve	East side of containment pad.
Bldg 70, Bank 70, OS-1-70, Bank 30	Transformer oil	Locked valve Valve & pump	
Bldg 70A, Bank 31	Diala AX transformer oil No PCBs	2 locked valves	East end of containment pad.
Bldg 77, Bank 72	Diala AX transformer oil No PCBs	1 locked valve	Down pipe for valve handle within sump under transformers (Southwest side of pad)
Bldg 88, Bank 80; Oil Separation Sump	Diala AX transformer oil Possible PCBs, up to 17 ppm		West end of containment pad.
Bldg 90, Bank 90	Diala AX transformer oil No PCBs	1 locked valve	West end of containment pad.

FIGURE 1: Secondary Containment Locations

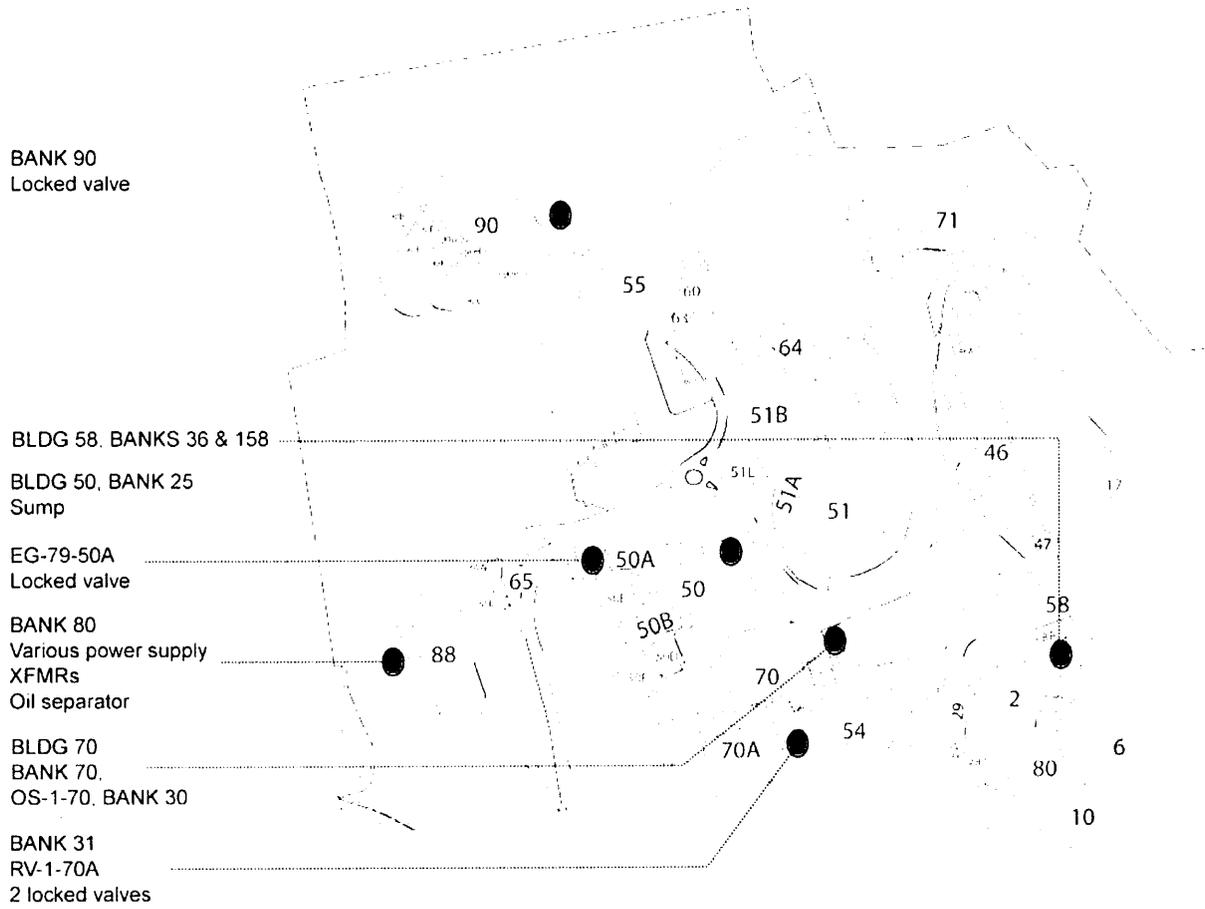
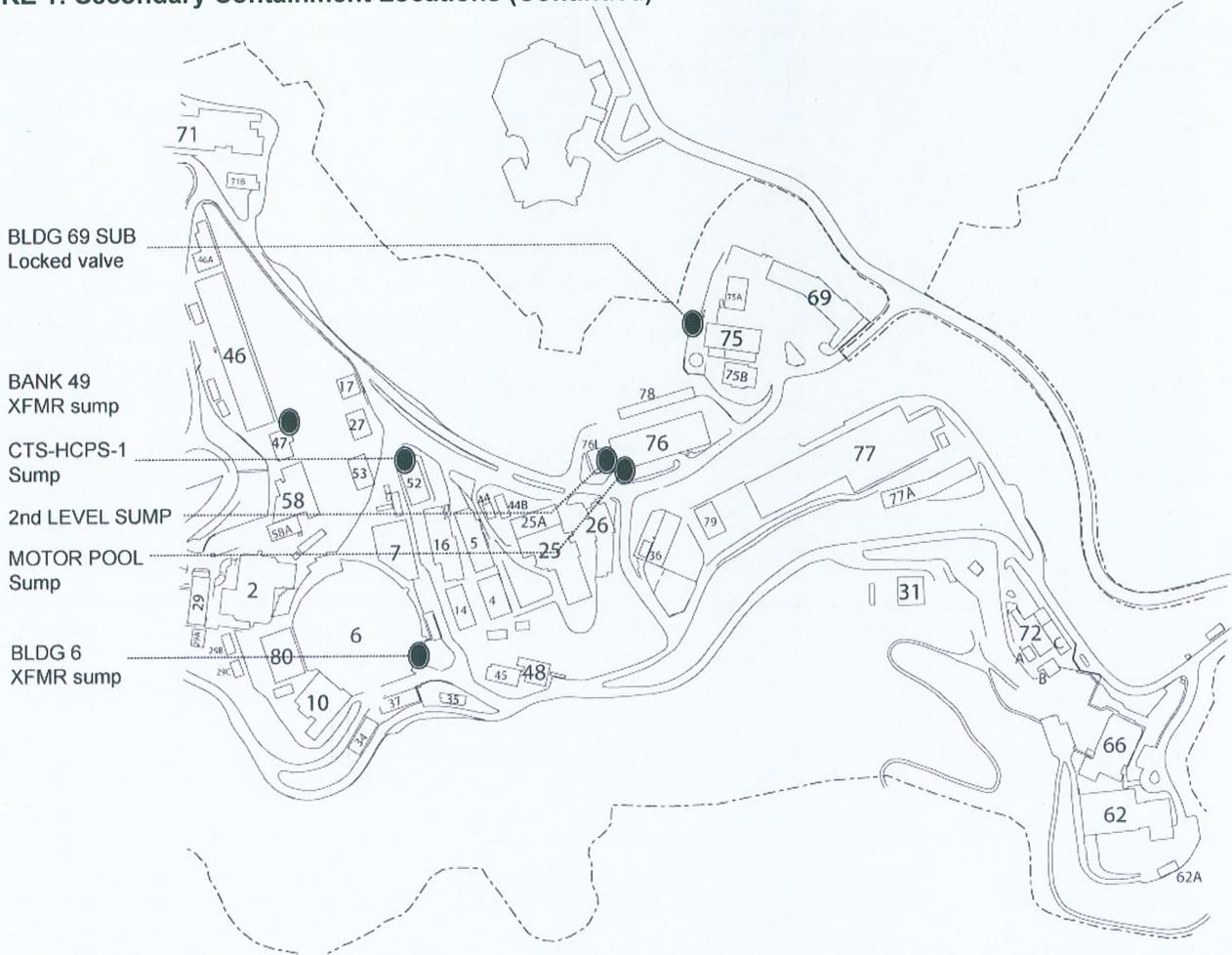


FIGURE 1: Secondary Containment Locations (Continued)



CONDITION CODE:

- 10 - No defects found
- 11 - Minor repair required
- 12 - Major repair required
- 13 - Replacement required

COMMENT:

RESPONSIBILITIES AND CONTROLS

Rev. No.	SME/Title	REV/Title	Approved/Title	Date	Effective Date
1	<i>Michael Botello</i> Michael Botello Plant Maint Tech Lead	<i>Larry Begley</i> Larry Begley Maintenance Supervisor	<i>Ken Fletcher</i> Ken Fletcher Operations Department Head	6/11/09	6/11/09

ATTACHMENT: Rainwater Disposal Log - Inspection Checklist

Complete log entries in accordance with Facilities Dept procedure OPER-056.

SECONDARY CONTAINMENT UNIT: _____

UNIT LOCATION: _____

POSSIBLE CONTAMINANTS (Refer to table in OPER-056): _____

DATE: _____ **OPERATOR NAME:** _____

- 1. Is there any evidence of rainwater contamination (e.g., color, clarity, odor, oil sheen?)

If yes, describe: _____

Rainwater Discharge Information (not contaminated)

- 2. Rainwater discharged (if there is no evidence of contamination):

Time of discharge: _____ am / pm

Operator signature: _____

Contaminated Rainwater Information

- 3. Describe results of inspection from steps 6-9 of Oper-056 (if there is no evidence of contamination):

Operator signature:

- 4. Results of chemical analysis of rainwater, if any:

- 5. Final disposition of rainwater:

Authorization

- 6. Facilities Maint Supt and authorized EH&S representative must sign here to approve of contaminated rainwater:

Name:	_____	Name:	_____
Title:	_____	Title:	_____
Signature:	_____	Signature:	_____
Date:	_____	Date:	_____