



The Sewerage & Water Board

OF NEW ORLEANS

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August 24, 2022

CERTIFIED MAIL (7018 1830 0000 4116 7807)
RETURN RECEIPT REQUESTED

Louisiana Department of Environmental Quality
Office of Environmental Compliance
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention: Kelly O'Neal

RECEIVED
AUG 30 2022
LDEQ/OEC
ENFORCEMENT DIVISION

RE: ENFORCEMENT TRACKING NUMBER: HE-C-22-00472
AGENCY INTEREST NO. 5673
ALT. ID: LAD981511850

Dear Madam:

The SEWERAGE & WATER BOARD OF NEW ORLEANS (SWBNO) is in receipt of **COMPLIANCE ORDER HE-C-22-00472** issued by the Louisiana Department of Environmental Quality (the Department) on July 20, 2022, which was received on July 26, 2022, evident by the date and signature on the return receipt (green card).

In response to No. III of the Order Portion, the following details the circumstances and action taken by SWBNO to be provided to the Department within thirty (30) days of receipt of the enforcement action:

On March 4, 2022, the Department conducted an investigation of the SWBNO's *Carrollton Water Purification Plant* located at 8800 S. Claiborne Avenue in New Orleans, Orleans Parish, Louisiana (the Site), in response to a citizen's complaint of oily fluids discharging offsite from turbine operation. Specifically, the investigation revealed remnants of stains observed on street top, catch basin covers and on adjacent residents' property located on Spruce Street. Although Turbine 5 was operating at the time of the investigation, there was no indication that oily fluids were being emitted and/or discharged to the environment. On March 18, 2022, SWBNO submitted a response letter to the Department via email detailing the inability to remediate per recommendation of SWBNO's contracted vendor for Emergency Response and Remediation Services, OMI Environmental Solutions, along with SWBNO accepting claims regarding any potential damages to private property per impacted residents.

SWBNO started the process of conducting an internal investigation into the cause of any potential discharge of oily fluids and sought additional technical assistance in determining a root cause analysis. On March 24, 2022, General Electric (GE) conducted a site visit to investigate potential oil release issues and suggested it was possible the oil tank was overfilled. No oil was visually observed to be emanating from the exhaust stack while operating Turbine No. 5. GE indicated that overfilling the oil reservoir could result in the vapor extractor, which helps prevent oil from escaping at the shaft seals, could potentially draw excess oil from the tank and discharge oil into the turbine exhaust. Following the site visit, SWBNO requested GE to write a proposal with recommendations to remedy the issue to prevent any future incident. On March 25, 2022, SWBNO gathered drawing details identifying proper oil levels in the tank.

On April 19, 2022, GE provided recommendations on proper tank level when filling oil tank, installation of a knockdown vessel in the vapor extractor piping (which would take engineering design), and possible excessive clearance in the bearing oil seals (which would require significant disassembly to confirm). Further discussion on bearing seals led to a suggestion to perform a borescope to identify if oil is pooling inside Turbine No. 5. On May 4, 2022, SWBNO requested GE prepare a proposal for adding a knockdown vessel to the vapor extractor line and requested a timeline for when to expect GE to complete the design. On May 11, 2022, GE confirmed personnel to perform borescope for May 24, 2022; however, the borescope was postponed due to anticipated weather. SWBNO needed to keep Turbine No. 5 online due to ongoing maintenance activities on Turbine No. 4. Due to the need to maintain operation of the turbine for more rain events, the borescope was further postponed to late June and then to mid-July.

In response to No. II of the Order Portion, the following is a summary of the investigation conducted by GE to determine the cause of the incident to reported to the Department within forty-five (45) days of receipt of the enforcement action:

On July 20, 2022, GE performed the borescope and found no sign of oil pooling inside Turbine No. 5. Oil leaking into the turbine and exhausted was ruled out as a likely cause for the incident. The likely cause of the incident prompting the Department's inspection, was that of operator error in over filling the oil tank. The GE's Gas Turbine Borescope Inspection Report is attached for the Department's review.

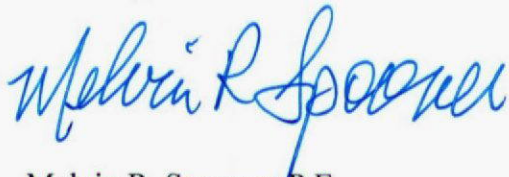
In response to No. I of the Order Portion, the following was done immediately after the incident to meet and maintain compliance with the Hazardous Waste Regulations.

After the incident occurred, increased monitoring of the oil gauge on the reservoir was compared to the tank level observed with a dipstick ensuring proper oil level when refilling reservoir. Turbine Operations has yet to overfill the oil reservoir levels since the incident. SWBNO will continue to utilize Turbine No. 5 based upon the operational requirements to this agency and residents in the surrounding area are being notified via email when Turbine No. 5 is operational. As of August 24, 2022, 174 days has passed without additional incidents occurring since the Department's initial inspection on March 4, 2022.

In closing, SWBNO is still awaiting the GE proposal to determine the feasibility of adding the knock down tank to support the vapor extractor to modernized Turbine No. 5. It is the SWBNO's

anticipation that this response satisfactorily resolves all the noncompliance cited in **COMPLIANCE ORDER HE-C-22-00472**. If you should have any further questions and/or concerns, please feel free to contact Corwin L Washington at (504) 930-7250 or via email at cwashington3@swbno.org.

Sincerely,



Melvin R. Spooner, P.E.
General Superintendent
Sewerage and Water Board of New Orleans

ATTACHMENT

- General Electric's Gas Turbine Borescope Inspection Report

cc: SWBNO

Chris Bergeron, P.E., Engineering Division Manager
Chanelle Collins, Assistant Special Council
Ghassan Korban, P.E., Executive Director
Thomas Moore, III, P.E., Mechanical Engineering
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