

Enclosure 5 to
LTR-RAC-20-94
Date: December 18, 2020

Enclosure 5

Response to Request for Additional Information

RAF-104-5, Environmental Protection Guidelines and Checklist

TITLE: ENVIRONMENTAL PROTECTION GUIDELINES
AND CHECKLIST
TYPE: CONTINUOUS USE
DATE: 05-14-20

FORM NO:
REFERENCE NO:
REVISION:

RAF-104-5
NONE
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Environmental Protection Guidelines and Checklist

REGULATORY AFFAIRS PROCEDURES WHICH REFERENCE THE FOLLOWING TOPICS:

RA-400, NPDES Permit Program
RA-401, Environmental Control Requirements mandated by 10CFR20 Regulations and NRC License SNM-1107
RA-405, Hazardous Chemical and Waste Management
RA-409, EPA Risk Management Program

REFERENCE: EH&S Engineering will assist with interpretation of the following:

29CFR1910 Subpart Z, Occupational Safety and Health Standards-Toxic and Hazardous Substances Hazard Communication Standard.
40CFR302 Appendix F, CERCLA Hazardous Substances; EPA Designation, Reportable Quantities, and Notification Requirements for Hazardous Substances Under CERCLA
40CFR355 Appendix G, Extremely Hazardous Substances; EPA Regulations for Emergency Planning and Notification under CERCLA
40CFR261, Identification and Listing of Hazardous Waste
40CFR68, EPA Risk Management Program
40CFR82, Protection of Stratospheric Ozone
SC-DHEC, Regulations 61-62, Air Pollution Control Regulations
SC-DHEC, Air Permit #1900-050
SC-DHEC, NPDES Permit SC0001848
SC-DHEC, IGP, Storm Water Discharges, SCR000000
ISO 14001, STANDARD FOR ENVIRONMENT MANAGEMENT SYSTEMS

Does the proposed change potentially impact Environmental Protection?

YES NO If YES, continue with this form.

If NO, further review is not required, provide signature below and complete justification section.

LIQUID EFFLUENT	Yes	No	N/A
Does the change generate a liquid effluent? If No, skip to the next section.			
Does change alter the characteristic of the waste from the process (i.e., Non- Hazardous to Hazardous)?			
Is a sampling and analysis plan required to properly characterize waste stream?			
Does the stream or solution leave the process area?			
Will this change alter the radiological content such that it will exceed established process controls that could ultimately raise the radiological effluents?			
Will sampling be required prior to pump out?			
Does the change affect stormwater?			
Does stream discharge to the river?			
Will chemical discharges meet current NPDES Permit criteria?			
Are any process modifications made which will change the liquid effluent requiring SC-DHEC NPDES Engineering liquid effluent notification?			
GASEOUS EFFLUENT	Yes	No	N/A
Does the change generate a gaseous effluent? If No, skip to the next section.			
Will it be necessary to vent the gaseous effluent to the outside?			
Does gaseous effluent require scrubbing?			
Are hazardous, toxic, or corrosive chemicals contained in the gaseous stream?			
Will this change alter the radiological content such that it will exceed established process controls that could ultimately raise radiological effluents?			
Will this change require additional air sampling measures?			
Will this create a new combustion source (boilers, incinerators, etc.)?			

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Does the change result in ventilation process modifications, which affect the current SC Air Quality Permit #1900-050 or SC-DHEC regulations 61-62 or may require submission of construction permits?			
Will the change result in release of greater than 100 tons/year of a regulated air pollutant (Title V Applicability)?			
Will the change result in a single hazardous air pollutant (HAP) emission of at least 10 tons/year or a 25 tons/year of any combination of HAP (Title V Applicability)?			
SOLID WASTE	Yes	No	N/A
Does the process generate any solid waste? If No, skip to the next section.			
Have provisions been made to dispose of any solid waste?			
Will the process require the removal or relocation of potentially contaminated soil and/or surfacing materials?			
Has sampling/analysis been performed to properly characterize waste (i.e., radioactive, hazardous)?			
Does the process involve sandblasting which may generate a hazardous material in the waste?			
Does the process generate a waste stream classified as hazardous, or require a TCLP test to verify per 40 CFR 261.24 and 261.3?			
Are chemicals used in process listed in the approved hazardous list for Plant? (RA-405)			
Has EH&S Engineering been notified of any new hazardous materials?			
Will CERCLA, SARA, RCRA, Pollution Prevention Act, and Stormwater requirements be affected?			
RISK MANAGEMENT PROGRAM	Yes	No	N/A
Does the change introduce a new hazard or increase an existing hazard to receptors, the public, or the environment related to RMP-EPA 40CFR68?			
Does the change involve current RMP covered system programs for aqueous ammonia >20% which require compliance with the 14 RMP program elements such as a Pre-Startup Safety Review, Hot Work Permit, or special training requirements?			
GROUNDWATER WELLS	Yes	No	N/A
Does the change impact any groundwater well directly, or does the change occur in the nearby vicinity of any groundwater well?			
Does the change impact groundwater or subsurface soil?			
ASBESTOS	Yes	No	N/A
Will any PACM (presumed asbestos containing material) be disturbed? If No, skip to the next section.			
Is asbestos inspection or sampling required?			
Is asbestos abatement required?			
OTHER REQUIREMENTS	Yes	No	N/A
Does the change potentially impact any archeological or historical sites on the Westinghouse property, or have provisions been made for protection or mitigation in the event of an archeological or historical discovery on-site?			
Does the change affect any environmental SSCs?			
Does the change affect an existing environmental aspect or impact, or create a new aspect or impact, as defined by ISO 14001 EMS criteria?			
Justification - Provide a justification for allowing the CCF change. This justification should be clear and detailed enough to allow for independent verification by a knowledgeable reviewer.			
Completed By: _____ Date: _____			

Retain form in ENOVIA for life of plant.