

Pamela F. Faggert  
Vice President and Chief Environmental Officer  
5000 Dominion Boulevard, Glen Allen, VA 23060  
Phone: 804-273-3467



July 24, 2001

50-280/281

HAND DELIVERED

7/24/01 DJF

Oula K. Shehab  
Piedmont Regional Office  
Department of Environmental Quality  
4949-A Cox Road  
Glen Allen, VA 23060-5106

**Re: Surry Power Station - VPDES Permit No. VA0004090 – Storm Water Exclusion**

Dear Ms. Shehab:

This is in follow up to your discussions with Daniel James regarding storm water permitting issues to accompany our application for a new VPDES permit for the discharges at Surry Power Station.

As noted in the original storm water permit application for Surry Power Station submitted in September 1992, and in subsequent applications and VPDES permits, all of the storm water discharges subject to input from industrial activities are included in our application for the VPDES permit. Due to the very nature of the activities at Surry, none of the industrial activities are exposed to storm water and contribute no contamination of storm water discharges. All discharges that combine with storm water are direct discharges identified as outfalls in the VPDES permit application. None of the other storm water routes or conveyances around the station property are subject to contamination from the industrial activities conducted at Surry.

Enclosed is a No Exposure Certification for all of the storm water discharges at Surry Power Station not already covered by the current VPDES permit and included in the recently submitted application. Should you desire additional information or have any questions, please contact Daniel James at (804) 273-2996.

Sincerely,

*Pamela F. Faggert*

Pamela F. Faggert

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4/1*

cc w/ attachments:

U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta St., NW  
Suite 2900  
Atlanta, GA 30323

Re: Surry Units 1 & 2  
Docket Nos. 50-280/50-281  
License Nos. DPR-32/DPR-37

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Re: Surry Units 1 & 2  
Docket Nos. 50-280/50-281  
License Nos. DPR-32/DPR-37

NRC Senior Resident Inspector  
Surry Power Station

**VIRGINIA DEQ NO EXPOSURE CERTIFICATION  
FOR EXCLUSION FROM VPDES STORM WATER PERMITTING**

Submission of this No Exposure Certification constitutes notice that the entity identified below does not require permit authorization for its storm water discharges associated with industrial activity under the VPDES Permit Program due to the existence of a condition of No Exposure.

A condition of No Exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the No Exposure exclusion. In addition, the exclusion from VPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the No Exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity below is certifying that a condition of No Exposure exists at its facility or site, and is obligated to comply with the terms and conditions at 9 VAC 25-31-120.F (the VPDES Permit Regulation).

Please Type or Print All Information. ALL INFORMATION ON THIS FORM MUST BE PROVIDED.

**1. Facility Owner Information**

Name: Dominion Generation  
Mailing Address: 5000 Dominion Blvd.  
City: Glen Allen State: VA Zip: 23060 Phone: (804) 273-3346

**2. Facility/Site Location Information**

Facility Name: Surry Power Station  
Address: 5570 Hog Island Rd., State Route 650  
City: Surry State: VA Zip: 23883  
Latitude: 37° 10' 01" Longitude: 76° 41' 50"

**3. Was the facility or site previously covered under a VPDES storm water permit?** Yes  No

If "Yes", enter the VPDES permit number: VA0004090 for both waste water and stormwater

**4. SIC/Activity Codes:** Primary: 4911 Secondary (if applicable): \_\_\_\_\_

**5. Total size of facility/site associated with industrial activity:** 830 (est.) acres

**6. Have you paved or roofed over a formerly exposed pervious area in order to qualify for the No Exposure exclusion?** Yes  No

If "Yes", please indicate approximately how much area was paved or roofed. Completing this question does not disqualify you for the No Exposure exclusion. However, DEQ may use this information in considering whether storm water discharges from your site are likely to have an adverse impact on water quality, in which case you could be required to obtain permit coverage.

Less than one acre  One to five acres  More than five acres

**7. Exposure Checklist**

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future? (Please check either "Yes" or "No" in the appropriate box.) If you answer "Yes" to any of these questions (1) through (11), you are not eligible for the No Exposure exclusion.

	Yes	No
1. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Materials or residuals on the ground or in storm water inlets from spill/leaks	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Materials or products from past industrial activity	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Material handling equipment (except adequately maintained vehicles)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Materials or products during loading/unloading or transporting activities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Materials or products handled/stored on roads or railways owned or maintained by the discharger	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Application or disposal of process wastewater (unless otherwise permitted)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**8. Certification Statement**

I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from VPDES storm water permitting.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 9 VAC 25-31-120.F).

I understand that I am obligated to submit a No Exposure Certification form once every five years to the Department and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the Department, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under a VPDES permit prior to any point source discharge of storm water from the facility.

Additionally, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: Pamela F. Faggert

Print Title: Vice President & Chief Environmental Officer

Signature: Pamela Faggert

Date: 7-24-01

For Department of Environmental Quality Use Only

Accepted/Not Accepted by: \_\_\_\_\_ Date: \_\_\_\_\_