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

Dominion

50-338/339

Certified Mail
Return Receipt Requested

April 28, 2004

Mr. Jeffrey Talbot
Northern Regional Office
13901 Crown Court
Woodbridge, Va. 22193

Re: Sampling / Testing Plan and Requests for Waivers
Reissuance of VPDES Permit No. VA0052451
Dominion - North Anna Power Station

Dear Mr. Talbot:

The attached document identifies our sampling and testing plan for the above-mentioned VPDES permit reissuance application, and describe our requests for sampling and testing waivers. The permit is due to expire on January 11, 2006, and we are currently developing a sampling schedule to support the application, which will be submitted next summer (2005).

In accordance with the requirements as we understand them, we have developed the attached Sampling and Testing Plan detailing the upcoming work planned for this facility. We plan to report analytical data from 2002-2004 (three years) of discharge monitoring reports for those conventional pollutant parameters currently limited in the NPDES permit for each process wastewater outfall.

Please also find enclosed the NPDES form 3510-11, EPA's No Exposure Certification for Exclusion from NPDES Storm Water Permitting. This form identifies North Anna Power Station as a "no exposure" facility, which relieves the facility from storm water permitting under EPA's Storm Water Multi-Sector General permit.

Dominion and North Anna Power Station appreciate this opportunity to review these requirements and coordinate our sampling plan with your agency. If you have any questions, please contact Joyce Livingstone at (804) 273-2985.

Sincerely,

Pamela F. Faggert

Pamela F. Faggert
Attachment

IE25

ATTACHMENT

cc: (w/attach.)
U. S. Nuclear Regulatory Commission
Region II
Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, GA 30303
RE: North Anna Units 1 and 2
Docket Nos. 50-338/50-339
License Nos. NPF-4/NPF-7

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555
RE: North Anna Units 1 and 2
Docket Nos. 50-338/50-339
License Nos. NPF-4/NPF-7

Mr. M. T. Widmann
NRC Senior Resident Inspector
North Anna Power Station

ATTACHMENT

SAMPLING / TESTING PLAN AND REQUESTS FOR WAIVERS
VPDES PERMIT NO. VA0052451 – NORTH ANNA POWER STATION
LIST OF VPDES OUTFALLS

EXTERNAL OUTFALLS

Outfall 001	Discharge of Condenser Cooling Water from WHTF at Dike 3
Outfall 009	Settling Pond
Outfall 013	Turbine Bldg Sump #1 and Common Sump & Storm Water only
Outfall 014	Turbine Bldg Sump #2 & Storm Water only
Outfall 016	Intake Screen Wash Water
Outfall 020	Reverse Osmosis Reject
Outfall 021	Reverse Osmosis Drain Line
Outfall 022	Drainage Area #2A (storm water only – no exposure)
Outfall 023	Drainage Area #2B (storm water only – no exposure)
Outfall 024	Drainage Area #3 (storm water only – no exposure)
Outfall 025	Drainage Area #18 (storm water only – no exposure)
Outfall 026	Drainage Area #25 (storm water only – no exposure)

INTERNAL OUTFALLS

Outfall 103	Process Waste Clarifier
Outfall 104	Oil/Water Separator & Storm Water
Outfall 105	Bearing Cooling Tower Blowdown
Outfall 107	Bearing Cooling System Discharge - Lake to Lake Operation
Outfall 108	Service Water Overboard
Outfall 109	Hot Well Drain Unit 1
Outfall 110	Hot Well Drain Unit 2
Outfall 111	Main Sewage Treatment Plant
Outfall 112	Steam Generator Blowdown Unit 1
Outfall 113	Steam Generator Blowdown Unit 2
Outfall 114	Service Water Pipe Vault Drain
Outfall 115	Service Water System Blowdown

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Outfall 001 Discharge of Condenser Cooling Water from WHTF at Dike 3

This outfall continuously discharges condenser cooling water from the Waste Heat Treatment Facility (WHTF) to Lake Anna at Dike 3. The retention time in the WHTF > 24 hours.

BOD_5, COD and TOC, Total Suspended Solids, Ammonia, Temperature (summer only): We will submit data from a grab sample in accordance with Form 2C instructions (retention period > 24 hours). A waiver for the off-season winter temperature is requested because it is regularly submitted in quarterly reports to DEQ.

Flow, pH, Total Residual Chlorine: Existing DMR data for 2002-2004 will be submitted consistent with reporting required by the current permit.

Form 2C - Part V-B and V-C parameters: We will collect and analyze a single grab sample for all pollutants included in Form 2C, Parts V-B & C of the permit application (Tables II, III and IV believed to be present). We acknowledge that the steam electric industry is not required to analyze for base neutrals or organic pesticide compounds [40 CFR Part §122, Appendix D, Note 1(c)(5), 7/1/03 edition] in once through cooling water. Also, Bis (Chloromethyl) Ether, Dichlorodifluoromethane and Trichlorofluoromethane are delisted priority pollutants and we do not plan to test for these parameters.

Outfall 009 Settling Pond

This intermittent discharge is from ground water, backwash cleaning from sand filters and reverse osmosis units with the majority of the discharge consisting of storm water runoff. The retention time > 24 hours.

BOD_5, COD, TOC, Ammonia, Temperature (summer and winter): We will submit data from a single grab sample in accordance with Form 2C instructions.

Flow, TSS, pH: Existing DMR data for 2002-2004 will be submitted consistent with reporting required by the current permit.

Form 2C - Part V-B and V-C parameters: We will collect and analyze a single grab sample for all pollutants included in Form 2C, Parts V-B & C of the permit application (Tables II, III and IV believed to be present). We acknowledge that the steam electric industry is not required to analyze for organic pesticide compounds [40 CFR Part §122, Appendix D, Note 1(c)(5), 7/1/03 edition]. Also, Bis (Chloromethyl) Ether, Dichlorodifluoromethane and Trichlorofluoromethane are delisted priority pollutants and we do not plan to test for these parameters.

Outfall 013 Turbine Bldg Sump #1 & Common Sump & Storm Water only

This intermittent outfall is an alternate discharge route for the effluent making up the majority of the flow at Outfall 104. Outfall 104 will be submitted to represent Outfall 013.

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Outfall 014 Turbine Bldg Sump #2 & Storm Water only

This intermittent outfall is an alternate discharge route for the effluent making up the majority of the flow at Outfall 104. Outfall 104 data will be submitted to represent Outfall 014.

Outfall 016 Intake Screen Wash Water

This outfall is a low volume, non-process discharge that consists entirely of lake water. Intake data will be submitted to represent Outfall 016.

Outfall 020 Reverse Osmosis Reject

This outfall is designed to discharge continuously, but there are times, which are rare, normally during outages when no make-up water is needed and all tanks are full, when it does not discharge. It consists of reverse osmosis reject water that contains only a 3.3x concentration of constituents of lake water, and a potential residual of 0-1 ppm free chlorine from sodium hypochlorite used in the Ionics system. No process waste waters or pollutants from other sources are added. Also, this outfall discharges into the incoming cooling water flow just outside the intakes. The retention time < 24 hours.

BOD_5, COD, TOC, Ammonia, Temperature (summer & winter): We request a waiver from the 24-hour composite sample requirement to be substituted with results from a single grab sample.

Flow, pH, TSS, Total Residual Chlorine: Existing DMR data for 2002-2004 will be submitted consistent with sampling required by the current permit.

Form 2C - Part V-B and V-C parameters: We request a waiver from the 24-hour composite sample requirement to be substituted with results from a single grab sample. We will collect and analyze for all pollutants included in Form 2C, Parts V-B & C of the permit application (Tables II, III and IV believed to be present). We acknowledge that the steam electric industry is not required to analyze for organic pesticide compounds [40 CFR Part §122, Appendix D, Note 1(c)(5), 7/1/03 edition]. Also, Bis (Chloromethyl) Ether, Dichlorodifluoromethane and Trichlorofluoromethane are delisted priority pollutants and we do not plan to test for these parameters.

Outfall 021 Reverse Osmosis Drain Line

This outfall is designed to discharge pure lake water from the reverse osmosis system. Outfall 021 has never been used and is in the permit for emergency use only in the case where the whole ionic system is down and the line needs to be drained. Intake data will be submitted to characterize Outfall 021.

Outfall 022 Drainage Area #2A (storm water only)

This is an area of approximately 52 acres, with approximately 7.1 acres of impervious area. Storm water collected in the higher portion to the south, contractor shops, parking lots and the switch yard flows into

ATTACHMENT

a drop grating to a culvert near the northeast corner of the switch yard and discharges into Lake Anna at Outfall 022. The lower, more level portion includes a vehicle maintenance shop, a paint shop and part of an outdoor equipment lay down area. Storm water runoff from the grassed portions of this area adjacent to the lakeshore is generally sheet flow.

This drainage area and storm water discharge is addressed in the attached **No Exposure Certification.**

Outfall 023 Drainage Area #2B (storm water only)

This is a small area of approximately 6 acres. The only impervious area is the 0.09 acre storage building which is used for hazardous waste accumulation, with other miscellaneous storage. This storage building is constructed with a curbed foundation to contain any spillage and to prevent any discharge outside the structure. Storm water collected in the higher portion to the south flows into a culvert under this storage building then discharges into Lake Anna at Outfall 023. Storm water runoff from the grassed portions of this area adjacent to the lake shore is generally sheet flow.

This drainage area and storm water discharge is addressed in the attached **No Exposure Certification.**

Outfall 024 Drainage Area #3 (storm water only)

A small drainage area of 9 acres with primarily sheet flow runoff of stormwater to Lake Anna. About 0.08 acre is paved and impervious. A portion of the laydown area, shared with Area 2A has runoff through a drop culvert under the roadway and into Lake Anna at Outfall 024.

This drainage area and storm water discharge is addressed in the attached **No Exposure Certification.**

Outfall 025 Drainage Area #18 (storm water only)

This 56 acre drainage area, with 4 acres of impervious area, includes a portion of the warehouse facilities, an outdoor laydown area and some small utility buildings. Storm water from the northern portion of this drainage area is conveyed under the paved roadway via two culverts. The culvert to the west carries the smaller amount of storm water flow which drains from open, grassed fields with no industrial activity. The culvert to the east was chosen as the sample point from Area 18 because it carries the collected drainage from the larger portion of the area, from the warehouse and laydown facilities. Outfall 025 discharges storm water from this drainage into the Waste Heat Treatment Facility.

This drainage area and storm water discharge is addressed in the attached **No Exposure Certification.**

Outfall 026 Drainage Area #25 (storm water only)

This 61 acre drainage area has no impervious surface area. In the northern portion of Area 25, there is a site used for temporary exposed storage of discarded miscellaneous material such as large concrete "dead weight" blocks for crane weight testing, small movable buildings, etc. This portion of the drainage area has runoff through a culvert under the roadway and into Lake Anna at Outfall 026. This culvert was selected as the sample point for Area 25; no industrial activities occur downstream. As with other lakeside areas, sections adjacent to the shoreline, north of the graveled roadway have sheet flow runoff of storm water.

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This drainage area and storm water discharge is addressed in the attached **No Exposure Certification.**

Outfall 103 Process Waste Clarifier

This intermittent discharge includes intermittent lower volumes of steam generator blowdown, also package boiler blowdown (not currently in use) and mat sump system discharge and ion exchanger waste, and intermittent blowdown of the Service Water Reservoir. The retention time is <24 hours.

BOD_5, COD, TOC, Ammonia, Temperature (summer only): We request a waiver from 4 single grab samples to 1 individual grab sample due to access and radiation exposure concerns, and a waiver for the off-season winter temperature is requested.

Flow, pH, TSS, Oil & Grease: Existing DMR data for 2002-2004 will be submitted consistent with reporting required by the current permit.

Form 2C - Part V-B and V-C parameters: We request a waiver from 4 single grab samples to 1 individual grab sample. We propose to collect and analyze a single grab sample for all pollutants included in Form 2C, Parts V-B & C of the permit application (Tables II, III and IV believed to be present). We acknowledge that the steam electric industry is not required to analyze for organic pesticide compounds [40 CFR Part §122, Appendix D, Note 1(c)(5), 7/1/03 edition]. Also, Bis (Chloromethyl) Ether, Dichlorodifluoromethane and Trichlorofluoromethane are delisted priority pollutants and we do not plan to test for these parameters.

Outfall 104 Oil/Water Separator & Storm Water

This discharge was previously approved to represent Outfalls 013 and 014 (Turbine Building Sump #1, Common Sump and Turbine Building Sump #2). The flow is intermittent, and the retention time is < 24 hours.

BOD_5, COD, TOC, Ammonia, Temperature (summer & winter): We request a waiver from the 4 hourly grab sample requirement to be substituted with results from a single grab sample.

Flow, TSS, pH, Oil and Grease: Existing DMR data for 2002-2004 will be submitted consistent with reporting required by the current permit.

Form 2C - Part V-B and V-C parameters: We request a waiver from the 4 hourly grab sampling requirement to be substituted with results from a single grab sample. We will collect and analyze for all pollutants included in Form 2C, Parts V-B & C of the permit application (Tables II, III and IV believed to be present). We acknowledge that the steam electric industry is not required to analyze for organic pesticide compounds [40 CFR Part §122, Appendix D, Note 1(c)(5), 7/1/03 edition]. Also, Bis (Chloromethyl) Ether, Dichlorodifluoromethane and Trichlorofluoromethane are delisted priority pollutants and we do not plan to test for these parameters.

Outfall 105 Bearing Cooling Tower Blowdown

This outfall is used to control the water chemistry in the system intermittently when either of the units is operating. The retention time is <24 hours. The sample will be collected from the Bearing Cooling Tower reservoir.

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BOD5, COD, TOC, Total Suspended Solids, Ammonia, Temperature (summer & winter): We request a waiver from the 24-hour composite sampling requirement and request approval to submit data from 1 individual grab sample.

pH: Existing data for 2002-2004 will be submitted consistent with sampling required by the current permit.

Form 2C - Part V-B and V-C parameters: We request a waiver from the 24-hour composite sampling requirement and request approval to submit data from 1 individual grab sample. We will collect and analyze for all pollutants included in Form 2C, Parts V-B & C of the permit application (Tables II, III and IV believed to be present). We acknowledge that the steam electric industry is not required to analyze for organic pesticide compounds [40 CFR Part §122, Appendix D, Note 1(c)(5), 7/1/03 edition]. Also, Bis (Chloromethyl) Ether, Dichlorodifluoromethane and Trichlorofluoromethane are delisted priority pollutants and we do not plan to test for these parameters.

Outfall 107 Bearing Cooling System Discharge - Lake to Lake Operation

This outfall is not currently in use. If a discharge were to occur, it would be temporary when the bearing cooling tower is valved off for maintenance work, and this is likely to occur within the next five years. Lake water would pass through the bearing cooling system, bypass the cooling tower and go straight to the WHTF. No treatment chemicals are used. There is no retention time. Intake data will be submitted to represent Outfall 107.

Outfall 108 Service Water Overboard

This outfall is manually operated with a valve, and is used intermittently to control the level of the Service Water Reservoir as necessary. The retention time of the service water reservoir is > 24 hours. A sample can be collected from the bank of the Service Water Reservoir near the intake structure. Outfall 108 is substantially identical to Outfalls 114 and Outfall 115.

BOD_5, COD, TOC, Total Suspended Solids, Ammonia, Temperature (summer & winter): We will submit data from a grab sample in accordance with Form 2C instructions.

Flow, pH: Existing data for 2002-2004 will be submitted consistent with sampling required by the current permit.

Form 2C - Part V-B and V-C parameters: We will collect and analyze a single grab for all pollutants included in Form 2C, Parts V-B & C of the permit application (Tables II, III and IV believed to be present). We acknowledge that the steam electric industry is not required to analyze for organic pesticide compounds [40 CFR Part §122, Appendix D, Note 1(c)(5), 7/1/03 edition]. Also, Bis (Chloromethyl) Ether, Dichlorodifluoromethane and Trichlorofluoromethane are delisted priority pollutants and we do not plan to test for these parameters.

Outfall 109 Hot Well Drain #1

This intermittent outfall was previously approved to represent Outfall 110 (Hot Well Drain #2), relatively high-purity condensate water, with small concentrations of corrosion chemicals. The drains

are normally used once per 18 months, on alternating schedules, during maintenance shutdowns of the respective units. To obtain a representative sample, this must be sampled during use (maintenance shutdown). The retention time > 24 hours.

BOD_5, COD, TOC, Ammonia, Temperature (summer): We will submit data from a single grab sample in accordance with Form 2C instructions, and a waiver for the off-season winter temperature is requested because of the infrequent discharge.

Flow, TSS, pH, Oil & Grease: Existing DMR data for 2002-2004 will be submitted consistent with reporting required by the current permit.

Form 2C - Part V-B and V-C parameters: We will collect and analyze a single grab sample for all pollutants included in Form 2C, Parts V-B & C of the permit application (Tables II, III and IV believed to be present. We acknowledge that the steam electric industry is not required to analyze for organic pesticide compounds [40 CFR Part §122, Appendix D, Note 1(c)(5), 7/1/03 edition]. Also, Bis (Chloromethyl) Ether, Dichlorodifluoromethane and Trichlorofluoromethane are delisted priority pollutants and we do not plan to test for these parameters.

Outfall 110 Hot Well Drain #2

Outfall 110 is substantially identical to Outfall 109 and we will submit Outfall 109 data to represent Outfall 110.

Outfall 111 Main Sewage Treatment Plant

All domestic sewage is routed to the main sewage treatment plant. The plant is equipped with two equalization basins, each with a capacity of 18,700 gallons. During normal operation only one side is used but during periods of high demand (outages) both sides are used.

Form 2A instructions require 3 samples [we propose 1/hour]. No waivers are requested. We will submit available DMR data for flow and TRC. We propose to submit 3 grab samples, one per hour for BOD-5, fecal coliform, TSS, pH, summer and winter temperatures.

Outfall 112 Steam Generator Blowdown Unit 1

This outfall was previously approved to represent Outfall 113 (Steam Generator Blowdown Unit 2), and continuously discharges relatively high-purity condensate water from a closed system with small concentrations of corrosion chemicals while Unit 1 is operating. It is normally only shut off during outages (every 18 months) for maintenance. The retention time < 24 hours.

BOD_5, COD, TOC, Ammonia, Temperature (summer & winter): We request a waiver from the 24-hour composite sampling requirement and request approval to submit data from a single grab sample.

Flow, pH, TSS, Oil & Grease: Existing DMR data for 2002-2004 will be submitted consistent with reporting required by the current permit.

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Form 2C - Part V-B and V-C parameters: We will collect and analyze a single grab sample for all pollutants included in Form 2C, Parts V-B & C of the permit application (Tables II, III and IV believed to be present. We acknowledge that the steam electric industry is not required to analyze for organic pesticide compounds [40 CFR Part §122, Appendix D, Note 1(c)(5), 7/1/03 edition]. Also, Bis (Chloromethyl) Ether, Dichlorodifluoromethane and Trichlorofluoromethane are delisted priority pollutants and we do not plan to test for these parameters.

Outfall 113 Steam Generator Blowdown Unit 2

Outfall 113 is substantially identical to Outfall 112 and we will submit Outfall 112 data to represent Outfall 113.

Outfall 114 Service Water Pipe Vault Drain

This outfall is used when leakage accumulates in the Pipe Vault adjacent to the Service Water Reservoir. Outfall 108 is substantially identical to Outfalls 114 and we will submit Outfall 108 data to represent Outfall 114.

Outfall 115 Service Water System Blowdown

This outfall will be for emergency use only, to blowdown the service water reservoir when other pathways are not available for whatever reasons. Outfall 108 is substantially identical to Outfall 115 and we will submit Outfall 108 data to represent Outfall 115.

NPDES FORM 3510-11

EPA

United States Environmental Protection Agency
Washington, DC 20460

Form Approved
OMB No. 2040-0211

NO EXPOSURE CERTIFICATION for Exclusion from NPDES Storm Water Permitting

Submission of this No Exposure Certification constitutes notice that the entity identified in Section A does not require permit authorization for its storm water discharges associated with industrial activity in the State identified in Section B under EPA's Storm Water Multi-Sector General Permit 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 NPDES 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 in Section A is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of 40 CFR 122.26(g).

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed instructions for completing this form and obtaining the no exposure exclusion are provided on pages 3 and 4.

A. Facility Operator Information

1. Name: Dominion Virginia Power 2. Phone: 804 771 3000

3. Mailing Address: a. Street: P. O. Box 26666

b. City: Richmond c. State: VA d. Zip Code: 23261 -

B. Facility/Site Location Information

1. Facility Name: North Anna Power Station

2. a. Street Address: 1022 Haley Avenue

b. City: Mineral c. County: Louisa

d. State: VA e. Zip Code: 23117 -

3. Is the facility located on Indian Lands? Yes ☐ No ☒

4. Is this a Federal facility? Yes ☐ No ☒

5. a. Latitude: 38 ° 03 ' 38 " b. Longitude: 77 ° 47 ' 26 "

6. a. Was the facility or site previously covered under an NPDES storm water permit? Yes ☒ No ☐

b. If yes, enter NPDES permit number: VA0052451

7. SIC/Activity Codes: Primary: 4911 Secondary (if applicable):

8. Total size of site associated with industrial activity: 1,043 acres

9. a. Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the no exposure exclusion? Yes ☐ No ☒

b. If yes, please indicate approximately how much area was paved or roofed over. Completing this question does not disqualify you for the no exposure exclusion. However, your permitting authority 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 ☐

NPDES FORM 3510-11	EPA	NO EXPOSURE CERTIFICATION for Exclusion from NPDES Storm Water Permitting	Form Approved OMB No. 2040-0211

C. 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	☐	☒
2. Materials or residuals on the ground or in storm water inlets from spills/leaks	☐	☒
3. Materials or products from past industrial activity	☐	☒
4. Material handling equipment (except adequately maintained vehicles)	☐	☒
5. Materials or products during loading/unloading or transporting activities	☐	☒
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)	☐	☒
7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers	☐	☒
8. Materials or products handled/stored on roads or railways owned or maintained by the discharger	☐	☒
9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])	☐	☒
10. Application or disposal of process wastewater (unless otherwise permitted)	☐	☒
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	☐	☒

D. 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 NPDES 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 40 CFR 122.26(g)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to the NPDES permitting authority 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 NPDES permitting authority, 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 an NPDES 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 on 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: Jack Michael Davis

Print Title: Site Vice President

Signature: Jack Michael Davis

Date: 03/1/04

NPDES FORM 3510-11

EPA

Instructions for the NO EXPOSURE CERTIFICATION for Exclusion from NPDES Storm Water Permitting

Form Approved OMB No. 2040-0211

Who May File a No Exposure Certification

Federal law at 40 CFR Part 122.26 prohibits point source discharges of storm water associated with industrial activity to waters of the U.S. without a National Pollutant Discharge Elimination System (NPDES) permit. However, NPDES permit coverage is not required for discharges of storm water associated with industrial activities identified at 40 CFR 122.26(b)(14)(i)-(ix) and (xi) if the discharger can certify that a condition of "no exposure" exists at the industrial facility or site.

Storm water discharges from construction activities identified in 40 CFR 122.26(b)(14)(x) and (b)(15) are not eligible for the no exposure exclusion.

Obtaining and Maintaining the No Exposure Exclusion

This form is used to certify that a condition of no exposure exists at the industrial facility or site described herein. This certification is only applicable in jurisdictions where EPA is the NPDES permitting authority and must be re-submitted at least once every five years.

The industrial facility operator must maintain a condition of no exposure at its facility or site in order for the no exposure exclusion to remain applicable. If conditions change resulting in the exposure of materials and activities to storm water, the facility operator must obtain coverage under an NPDES storm water permit immediately.

Where to File the No Exposure Certification Form

No Exposure Forms sent regular mail:

SW No Exposure Certification (4203M)
USEPA
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Forms sent overnight/express:

SW No Exposure Certification
US EPA East Building, Rm. 7420
1201 Constitution Avenue, NW
Washington, D.C. 20004
(202) 564-9545

Completing the Form

You must type or print, using uppercase letters, in appropriate areas only. Enter only one character per space (i.e., between the marks). Abbreviate if necessary to stay within the number of characters allowed for each item. Use one space for breaks between words. One form must be completed for each facility or site for which you are seeking to certify a condition of no exposure. Additional guidance on completing this form can be accessed at EPA's website: www.epa.gov/npdes/stormwater. Please make sure you have addressed all applicable questions and have made a photocopy for your records before sending the completed form to the above address. Please submit original document with signature in ink–DO NOT send copies.

Section A. Facility Operator Information

1. Provide the legal name of the person, firm, public organization, or any other entity that operates the facility or site described in this certification. The name of the operator may or may not be the same as the name of the facility. The operator is the legal entity that controls the facility's operation, rather than the plant or site manager.

2. Provide the telephone number of the facility operator.

3. Provide the mailing address of the operator (P.O. Box numbers may be used). Include the city, state, and zip code. All correspondence will be sent to this address.

Section B. Facility/Site Location Information

1. Enter the official or legal name of the facility or site.

2. Enter the complete street address (if no street address exists, provide a geographic description [e.g., Intersection of Routes 9 and 55]), city, county, state, and zip code. Do not use a P.O. Box number.

3. Indicate whether the facility is located on Indian Lands.

4. Indicate whether the industrial facility is operated by a department or agency of the Federal Government (see also Section 313 of the Clean Water Act).

5. Enter the latitude and longitude of the approximate center of the facility or site in degrees/minutes/seconds. Latitude and longitude can be obtained from United States Geological Survey (USGS) quadrangle or topographic maps, by calling 1-(888) ASK-USGS, or by accessing the Census Bureau at: http://www.census.gov/cgi-bin/gazetteer.

   Latitude and longitude for a facility in decimal form must be converted to degrees (°), minutes (′), and seconds (″) for proper entry on the certification form. To convert decimal latitude or longitude to degrees/minutes/seconds, follow the steps in the following example.

   Example: Convert decimal latitude 45.1234567 to degrees (°), minutes (′), and seconds (″).

   a) The numbers to the left of the decimal point are the degrees: 45°.

   b) To obtain minutes, multiply the first four numbers to the right of the decimal point by 0.006: 1234 x 0.006 = 7.404.

   c) The numbers to the left of the decimal point in the result obtained in (b) are the minutes: 7′.

   d) To obtain seconds, multiply the remaining three numbers to the right of the decimal from the result obtained in (b) by 0.06: 404 x 0.06 = 24.24. Since the numbers to the right of the decimal point are not used, the result is 24″.

   e) The conversion for 45.1234567 = 45° 7′ 24″.

6. Indicate whether the facility was previously covered under an NPDES storm water permit. If so, include the permit number.

7. Enter the 4-digit SIC code which identifies the facility's primary activity, and second 4-digit SIC code identifying the facility's secondary activity, if applicable. SIC codes can be obtained from the Standard Industrial Classification Manual, 1987.

8. Enter the total size of the site associated with industrial activity in acres. Acreage may be determined by dividing square footage by 43,560, as demonstrated in the following example.

   Example: Convert 54,450 ft^2 to acres

   Divide 54,450 ft^2 by 43,560 square feet per acre:
   54,450 ft^2 ÷ 43,560 ft^2/acre = 1.25 acres.

9. Check "Yes" or "No" as appropriate to indicate whether you have paved or roofed over a formerly exposed, pervious area (i.e., lawn, meadow, dirt or gravel road/parking lot) in order to qualify for no exposure. If yes, also indicate approximately how much area was paved or roofed over and is now impervious area.

Instructions for the NO EXPOSURE CERTIFICATION for Exclusion from NPDES Storm Water Permitting

Form Approved OMB No. 2040-0211

Section C. Exposure Checklist

Check "Yes" or "No" as appropriate to describe the exposure conditions at your facility. If you answer "Yes" to ANY of the questions (1) through (11) in this section, a potential for exposure exists at your site and you cannot certify to a condition of no exposure. You must obtain (or already have) coverage under an NPDES storm water permit. After obtaining permit coverage, you can institute modifications to eliminate the potential for a discharge of storm water exposed to industrial activity, and then certify to a condition of no exposure.

Section D. Certification Statement

Federal statutes provide for severe penalties for submitting false information on this application form. Federal regulations require this application to be signed as follows:

For a corporation: by a responsible corporate officer, which means:

(i) president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation, or

(ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;

For a partnership or sole proprietorship: by a general partner or the proprietor; or

For a municipal, State, Federal, or other public facility: by either a principal executive or ranking elected official.

Paperwork Reduction Act Notice

Public reporting burden for this certification is estimated to average 1.0 hour per certification, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose to provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments regarding the burden estimate, any other aspect of the collection of information, or suggestions for improving this form, including any suggestions which may increase or reduce this burden to: Director, OPPE Regulatory Information Division (2137), USEPA, 401 M Street, SW, Washington, D.C. 20460. Include the OMB control number of this form on any correspondence. Do not send the completed No Exposure Certification form to this address.