

**LaSalle Environmental Audit
Response to Request for Additional Information**

Index #: 032 **RAI #:** SW-04 **Category:** Water Resources

Statement of Question:

Docket the text of the LSCS Stormwater Pollution Prevention Plan, June 2013, or latest version.

Response:

Text of the current revision of the LaSalle Storm Water Pollution Prevention Plan is being provided as Attachment 1 to this RAI response.

List of Attachments

1. Exelon Nuclear LaSalle County Station Storm Water Pollution Prevention Plan, June 2013 [without figures]

RAI # SW-04
ATTACHMENT 1

STORM WATER POLLUTION PREVENTION PLAN



**LaSalle County Station
Marseilles, Illinois
NPDES Permit No. IL0048151**

June 2013

TABLE OF CONTENTS

MANAGEMENT APPROVAL.....	iii
RECORD OF REVISIONS	iv
1.0 INTRODUCTION	1
1.1 Purpose and Scope	1
1.2 Regulatory Background	1
1.3 Site Location and Property Description	1
1.4 Description of Facility Operations.....	1
1.5 Drainage Patterns	2
2.0 STORM WATER POLLUTION PREVENTION TEAM	3
3.0 DESCRIPTION OF POTENTIAL POLLUTANT SOURCES	4
3.1 Storm Water Outfalls and Drainage Areas.....	4
3.2 Potential Sources of Pollution.....	5
3.3 Significant Spills, Leaks, and Other Environmental Releases	6
3.4 Non-Storm Water Discharges	6
3.5 Risk Identification and Summary of Potential Pollutant Sources	7
3.6 Requirements for SARA Section 313 Facilities.....	7
4.0 STORM WATER POLLUTION PREVENTION BEST MANAGEMENT PRACTICES AND CONTROLS.....	8
4.1 Engineering Controls	8
4.2 Spill Response and Existing Compliance Plans.....	8
4.3 Sediment and Erosion Prevention	9
4.4 Good Housekeeping.....	9
4.5 Visual Inspections and Preventive Maintenance.....	10
4.6 Employee Training and Communication	11
4.7 Record Keeping and Internal Reporting Procedures.....	11
4.8 Facility Security	13
5.0 STORM WATER POLLUTION PREVENTION PLAN EVALUATION AND MONITORING REQUIREMENTS	14
5.1 Storm Water Analytical Testing Requirements	14
5.2 Annual Site Inspection and Summary Report.....	14
5.3 SWPPP Revision and Subsequent Implementation	14
5.4 Signatory Authority.....	15

TABLE OF CONTENTS-CONTINUED

FIGURES

Figure 1 – General Site Plan

Figure 2 – Drainage Area

Figure 3 - Drainage Zones Map

Figure 4 –Facility General Layout

Figure 5 – River Screen House Drainage

APPENDICES

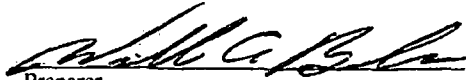
Appendix A: NPDES Permit

Appendix B: Certification of Absence of Non-Storm Water Discharges

Appendix C: Example Storm Water Inspection Checklist

MANAGEMENT APPROVAL
STORM WATER POLLUTION PREVENTION PLAN


Exelon Generation Company, LLC
LaSalle County Station, Marseilles, Illinois


Preparer

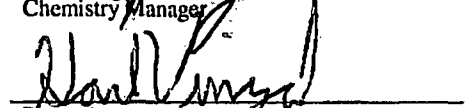
6/3/13
Date


Environmental Specialist (or designee)

6/3/13
Date


Chemistry Manager

6-10-13
Date


Plant Manager

6-10-13
Date

RECORD OF REVISIONS
STORM WATER POLLUTION PREVENTION PLAN

Exelon Generation Company, LLC
LaSalle County Station, Marseilles, Illinois

Revision Number	Description	Implementation Date
0	Initial preparation	January 3, 2008
1	Incorporate recommendations from Nuclear Corporate Environmental Check-In. (IR 807582)	December 17, 2008
2	Incorporate 2011 SWPPP Inspection Observations (ATI 01257786)	October 31, 2011
3	Incorporate 2012 SWPPP Inspection Observation (IR01406564)	June 4, 2013

SECTION 1.0 INTRODUCTION

1.1 Purpose and Scope

The purpose of this Storm Water Pollution Prevention Plan (SWPPP) is to comply with Special Condition No. 8 of the Exelon Generation Company, LLC, (Exelon), LaSalle County Station (LaSalle Station) NPDES Permit No. IL0048151 regarding storm water discharges associated with industrial activity. A General Site Plan is shown in Figure 1. A copy of the NPDES permit is included in Appendix A. A permit renewal application was submitted in December 2011 in accordance with Standard Condition 2 of the station's permit.

1.2 Regulatory Background

The NPDES permit for LaSalle Station was reissued to Exelon on July 2007, modified on April 26, 2010 to reflect a new sewage treatment plant and expires June 30, 2012. In accordance with Special Condition 8 of the permit, an SWPPP shall be developed for storm water associated with industrial activity at the facility. This SWPPP is applicable to storm water runoff which is not processed by LaSalle Station's wastewater treatment facilities. In addition, the SWPPP shall describe and ensure the implementation of practices, which are to be used to reduce the pollutants in storm water discharges at the facility and to assure compliance with the terms and conditions of the NPDES permit.

1.3 Site Location and Property Description

The LaSalle County Station site is located in the southeastern part of LaSalle County, 6 miles southeast of Marseilles, Illinois, 3 miles west of State Highway 170, and 1/2 mile north of the Grand Ridge-Mazon Road (LaSalle County Highway 6). The LSCS site and the cooling lake cover an area of approximately 3,060 acres. The station is located approximately 5.0 miles south of the Illinois River. The cooling lake is approximately 2 miles south of the Illinois River at its closest point. The river screen house is located at 249.5 river miles upstream from the mouth of the Illinois River at Grafton, Illinois. It is 4.9 miles upstream of Marseilles lock, 2.5 miles upstream of Marseilles dam, and 22 miles downstream of Dresden Dam. The normal pool elevation of the Marseilles pool is 482.8 feet MSL.

1.4 Description of Facility Operations

LaSalle Station is a nuclear powered electrical generating and distribution facility. The station utilizes two single-cycle forced-circulation boiling water reactors, each rated at 3546 MWt and designed for 3559 MWt. The gross electric output of each unit is 1210 MWe; the net output is 1178 MWe from each General Electric (GE) turbine-generator. Electrical generating operations are generally carried out inside three main buildings: 1) Reactor Building; 2) Auxiliary Building; and 3) Turbine Building. Additional on site facilities include a Lake Screen House, two Service Buildings, several warehouses and storage buildings, and a training building.

Condenser water is cooled by means of a cooling lake forming a part of the closed cooling system. The surface area of the cooling lake at its normal pool elevation of 700 feet MSL is 2,058 acres. The lake is created by constructing dikes totaling 37,942 feet in length on three sides.

The facility is operated 24 hours per day, 365 days per year. Over 800 people work on site and the facility is always manned. In addition, a full contingent of security personnel is constantly on patrol at the facility. Station security is maintained on a twenty-four (24) hour basis. At various intervals during the day and night, patrols of the station property are conducted. The plant site is well lighted and enclosed by perimeter security fencing. Any abnormal conditions observed during a security inspection are reported to the LaSalle Station Shift Manager.

1.5 Drainage Patterns

A topographical presentation of the plant's drainage area is presented in Figure 2. The terrain around the plant site is gently rolling, with ground surface elevations varying from 700 feet to 724 feet MSL, which is 217 feet above the normal pool elevation in the Illinois River. The plant grade and floor elevations are 710 feet and 710.5 feet MSL respectively. Natural grade elevation at the site varies from 700 feet to 724 feet MSL. Natural drainage at the station site is generally toward the cooling lake.

As depicted in Figure 3, the plant area is divided into two zones, Zone I (north) and Zone II (south) which discharge to the North Site and South Site Runoff Outfalls respectively. This is addressed further in Section 3.1. Elevations of the ground surface, the plant grade, the roads, and the railroads in the site vicinity are shown in Figure 3. The lowest elevation of the road around the laydown area north of railroad track number 5 is 708 feet MSL. The top elevation of the road on the west of the laydown areas varies from 708.0 feet to 709.0 feet MSL. The top elevation of railroad track number 3, which enters the plant building, varies between 709.5 and 710.5 feet MSL. The site drainage system is designed for a precipitation intensity of 4 in./hr.

The areas to the northwest and south of Zones I and II of the plant area are drained away by existing creeks and gullies (Figure 3). On the east side of the switchyard, the finished grade is at elevation 713.0 feet, beyond which there are lower elevations towards the lake on the east. Therefore, storm runoff from the switchyard area flows east towards the lake and does not reach the plant buildings. A portion of the switchyard, however, is included in Zone II as shown in Figure 3.

SECTION 2.0

STORM WATER POLLUTION PREVENTION TEAM

LaSalle Station staff members shall be identified, to comprise the facility's SWPPP team. The members of the SWPPP team are delegated specific storm water management tasks for the development, implementation, and revision of the SWPPP. The members consist of LaSalle Station Environmental Specialist, Chemists, Training, and Management. The following tasks are assigned:

- Plan Development;
- Plan Implementation;
- Best Management Practice (BMP) Selection;
- Communication of Non-compliance and Corrective Measure Implementation;
- Spill Response and Spill List Revisions;
- Inspections and Annual Evaluations
- Employee Training;
- Recordkeeping and Reporting;
- Plan Revisions
- Signatory Authority.

Compliance with NPDES permit terms and conditions, including those associated with storm water runoff, is the responsibility of the Plant Manager. Development and implementation of the SWPPP is the responsibility of the Environmental Specialists. The Environmental Specialists function cooperatively to ensure compliance with the conditions and limitations of the LaSalle Station NPDES permit as it applies to storm water runoff.

- The SWPPP Team is responsible for oversight to ensure that all requirements and conditions of the NPDES permit are implemented.

SECTION 3.0 DESCRIPTION OF POTENTIAL POLLUTANT SOURCES

3.1 Storm Water Outfalls and Drainage Areas

The facility has several drainage pathways with respect to the discharge of storm water associated with industrial activity. Except for the River Screen House area, the drainage pathways terminate in the cooling pond. The cooling pond flows down to the Illinois River.

- North Site Stormwater Runoff (Outfall G01)
Uncontaminated runoff from the north side of the facility flows through the north retention pond, which then discharges to the cooling pond discharge canal via Outfall G01. Some of the storm drains on the facility's north side, including those around the Unit 2 Transformers, are routed through the Unit 2 Oil Separator upstream of the north retention pond. This separator is monitored quarterly by Operations.
- South Site Stormwater Runoff (Outfall H01)
Uncontaminated runoff from the south side of the facility flows through the south retention pond, which then discharges to the cooling pond discharge canal via Outfall H01. Some of the storm drains on the facility's south side including those around the Unit 1 Transformers are routed through the Unit 1 Oil Separator, upstream of the south retention pond. This separator is monitored quarterly by Operations. The outfall also receives runoff from the LaSalle Firing Range (and associated berm). The Firing Range is located south of the South Retention Pond and the range runoff flows into the retention pond which, as, stated previously discharges to the cooling pond discharge canal via Outfall H01. The firing range is used by security personnel from several Exelon facilities, some of which use lead bullets. The station has developed a lead management plan to implement best management practices for managing spent lead and potential contamination. Best Management Practices include applying soil amendments as needed for lead fixation, use of portable bullet traps to capture the spent lead, and sampling the firing range soil for lead on a routine basis.
- Peripheral Dike Drainage Ditch
This ditch serves to intercept surface stormwater runoff and Cooling Pond seepage at the downstream toe of the dikes. The Peripheral Dike Drainage Ditch discharges water into Armstrong Run at Latitude 41° 15' 36"N and Longitude 88° 37' 03"W, as well as three branches of the South Kickapoo Creek, as shown in the attached Figure 3.
- Switchyard
The finished grade is at elevation 713.0 feet, beyond which there are lower elevations towards the lake on the east. Therefore, storm runoff from the switchyard area flows east towards the lake and does not reach the plant buildings. A portion of the switchyard, however, is included in Zone II as shown in Figure 3.
- River Screen House (RSH)
This drainage is limited to a small area located adjacent to the River Screen House. This area is located on the south bank of the Illinois River. Runoff occurs as sheet flow from this area and drains directly to the Illinois River. There is one transformer situated in a switchyard area immediate west of the RSH. Absorbent rock lines the ground beneath the transformer. The absorbent rock beneath the transformer drains to an underground piping system that is connected to an oil/water separator. The oil/water separator has been designed to contain a spill should the transformer fail and release its' entire contents. The separator oil/sludge are monitored quarterly by the Operating Department and are cleaned out when specified threshold levels are reached.

3.2 Potential Sources of Pollution

Significant Material Storage

The following chemicals (*not addressed by the station's SPCC*) are stored outside of the main buildings at LaSalle Station below (*NOTE: Refer to Figure 4 for Drawing ID*):

<u>Material</u>	<u>Plant Location / Source</u>	<u>Drawing ID</u>
AZ8103 (Yellow Metal Corrosion Inhibitor)	South of Chem Feed (CF) Bldg	B-4 (k)
pH ree Guard 4500(Silt Dispersant)	South of Chem Feed Bldg	B-4 (k)
Ethylene Glycol	Station Heat (SH) Chillers	D-4
Gasoline		
Diesel		

As part of the assessment phase of the SWPPP, the storm water runoff drainage areas described in Section 3.1 were inspected to identify the exposed significant materials that have the potential to contribute pollutants to the storm water runoff. As defined in 40 CFR 122.26(b)(12), the term "significant materials" includes, but is not limited to: raw materials; fuels; solvents; finished products; hazardous substances; any chemical the facility is required to report pursuant to Section 313 of Title III of Superfund Amendments and Reauthorization Act (SARA); and any waste products that have the potential to be released with storm water runoff.

An inventory of exposed significant materials and potential pollutant source(s) at the LaSalle Station are identified and listed below, as well as the specific pollutant parameter(s) of concern (where applicable) that can reasonably be associated with each source, and existing materials management practices and structural controls designed to prevent or minimize storm water contamination.

Potential Pollutant Sources - North Runoff

The following are potential pollutant sources to the North Site Runoff:

The **Yellow Metal Corrosion Inhibitor and Silt Dispersant Tanks** are dual walled and have fill stations equipped with spill collection systems. The tanks have level indication devices and station Operations personnel monitor the area daily for cleanliness and equipment integrity.

The **SH Chillers** are enclosed package units containing ethylene glycol. The systems are equipped with relief valves which discharge to overflow barrels. Flow to the drums is very infrequent and slow. The drums are situated on spill pallets and enclosed in heavy plastic covers and are monitored daily by the Outsides Rounds Operator.

The Road Maintenance Building for potential salt storage. Salt is stored inside of building to prevent any possibility of becoming dissolved by rainfall and subsequently flowing to the North Site Runoff.

The Independent Spent Fuel Storage Installation (ISFSI) for oil containing equipment. Equipment is typically stored inside the ISFSI building and spill prevention berms are utilized as specified per EN-AA-103-0003, Spill Prevention.

Potential Pollutant Sources – South Site Runoff

All potential pollutants are covered in the station's Spill Prevention Control and Countermeasure (SPCC) Plan. The plan delineates engineering controls for the prevention of potential spills.

Potential Pollutant Sources – Peripheral Dike Drainage Ditch

All potential pollutants are covered in the station's Spill Prevention Control and Countermeasure (SPCC) Plan. The plan delineates engineering controls for the prevention of potential spills.

Potential Pollutant Sources – Switchyard

There are no chemicals stored outside in this area, however there are oil-containing transformers and oil circuit breakers. This equipment is covered in the Spill Prevention Control and Countermeasures Plan.

Potential Pollutant Sources – River Screen House

There are no chemicals stored outside in this area, however there is a transformer, which is addressed in Section 3.1. This equipment is covered in the Spill Prevention Control and Countermeasures Plan.

3.3 Significant Spills, Leaks, and Other Environmental Releases

"Significant spills" have been defined by the USEPA as the release within a 24-hour period of toxic or hazardous substances in excess of reportable quantities under Section 311 of the Clean Water Act and Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). "Significant spills" also include "oil." "Oil" is defined at 40 CFR 109.2 as "oil of any kind or in any form, including, but not limited to petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil." Reportable quantities are predefined amounts of substances in pounds, gallons, or other units and are listed in 40 CFR 117 and 40 CFR 302. Releases are defined to include any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment.

History of Releases

There has been one significant spill at LaSalle Station. The occurrence is documented in the Exelon's CAPSYS program as CR L2001-0767. The spill involved a release of less than 1 gallon of hydraulic oil into the Illinois River on October 31, 2001. The oil source was a leaking valve actuator housed inside the River Screen House. The oil leaked into the RSH forebay. Typically, any oil in the forebay would be sucked into the Lake Make-Up pump suction, away from the forebay. In this instance, there were no Lake Make-Up pumps running and the oil was able to migrate to the River via a gap in the oil boom that sets between the forebay and river intake.

LaSalle Station and the Exelon Corporate Nuclear Environmental Services Department maintain spill records. Updates to this list will be generated as necessary to list all spills, leaks, or other releases along with a description of the cause of the spill, the action taken to respond to the spill, and actions taken to prevent similar spills.

3.4 Non-Storm Water Discharges

A dry-weather visual inspection of the LaSalle Station has been completed in order to evaluate each storm water outfall and/or drainage area for the presence of non-storm water discharges.

It was concluded that no non-storm water discharges are present in Outfalls G01 and H01 at the LaSalle Station. Appendix B of this SWPPP contains LaSalle Station's certification that non-storm water discharges, which are not otherwise identified above and/or duly authorized by the NPDES permit are not present in Outfalls G01 and H01.

3.5 Risk Identification and Summary of Potential Pollutant Sources

Based on the information obtained during the field investigation and site assessment phase of the development of LaSalle Station's SWPPP, the following were identified as potential pollutant sources at the facility that pose a risk of contaminating storm water discharges to the LaSalle Cooling Lake, a fraction of which blows down to the Illinois River:

- Leaks and/or spills associated chemical, gasoline and diesel fuel storage tanks and their associated piping;
- Outdoor storage activities such as salt storage for de-icing in the winter; and
- Loading and unloading operations for products such as bulk chemicals, gasoline and diesel fuel.

The information contained in this SWPPP (specifically Section 3.2) documents LaSalle Station's assessment of the potential pollutants and pollutant sources within each storm water drainage area of the facility.

3.6 Requirements for SARA Section 312 Facilities

LaSalle Station is required to report chemical storage pursuant to Section 312 of Title III of SARA. LaSalle Station minimizes storm water contact with bulk chemicals through the use of loading / unloading procedures, containment, and indoor storage.

SECTION 4.0

STORM WATER POLLUTION PREVENTION BEST MANAGEMENT PRACTICES AND CONTROLS

The focus of the following sections of the SWPPP will be to document the engineering controls and BMPs and other storm water management practices and controls identified to be implemented at LaSalle Station in order to minimize and/or prevent the discharge of potential pollutants in storm water runoff from the facility. BMPs are measures to prevent or mitigate pollution from any type of activity. Based upon the potential pollutant sources and storm water/non-storm water discharges identified in Sections 3.1 through 3.6, LaSalle Station has selected the following BMPs for implementation at the site and documentation in the SWPPP.

4.1 Engineering Controls

Engineering controls employed for the prevention of potential spills have been described previously in the 'Potential Pollutant Sources' section of this plan, and are summarized below (*NOTE: Refer to Figure 4 for Drawing ID*):

<u>Material</u>	<u>Drawing ID</u>	<u>Engineering Control</u>
Sodium Hexametaphosphate(Mild Steel Corrosion Inhibitor)	B-4 (k)	Dual walled tank; Fill station collection system
Silt Dispersant (HPS1)	B-4 (k)	Dual walled tank; Fill station collection system
Ethylene Glycol	D-4	Enclosed equipment skid, located distance from storm sewer.

Additionally, station operations personnel conduct routine inspections of these areas, including inspections for housekeeping and hazards such as leaks. The Station Environmental Specialist conducts similar periodic inspections. Corrective maintenance is performed under the station's Work Control Process.

4.2 Spill Response and Existing Compliance Plans

Spill Response is in accordance with station procedures and plans as follows:

- EN-AA-103-0003 Spill Prevention
- EN-AA-402-0004 Oil/Water Separator Management
- EN-AA-406 Spill Prevention, Control and Countermeasure Plans
- EN-MW-305 Tank Management
- EN-MW-402-0002 Storm Water Management
- EN-MW-501 Chemical Control
- LAP-911-1 Reporting Emergencies
- LAP-911-2 Hazardous Material (HazMat) Release Field Actions
- LAP-911-3 Hazardous Material (HazMat) Release Control Room Actions
- LAP-911-4 Chemical Non-Emergency Response
- LaSalle County Station Spill Prevention Control and Countermeasures (SPCC) Plan
- LaSalle County Station RCRA Contingency Plan
- LaSalle County Station Pre-Incident HAZMAT Plan

The control of chemicals on-site, including storage, handling, disposal, and the introduction of new chemicals to the station, is the responsibility of the Environmental Specialist. Procedures

EN-MW-501, Chemical Management Program, and EN-AA-301, Managing Regulated Wastes provide the guidance and instructions for the implementation of these programs.

4.3 Sediment and Erosion Prevention

Erosion of soils is a common result of storm water runoff on soil disturbed and destabilized by routine industrial activity. Left unattended, affected areas will contribute to elevated solids in storm water runoff and to the overall degradation of topsoil. Following initial construction, the areas surrounding the station were graded to control runoff and minimize erosion; many areas were re-vegetated to support this effort.

The potential for LaSalle Station's industrial activity to adversely impact indigenous soils is substantially reduced in those portions of the storm water drainage areas that are paved or concrete. Areas that are not paved or concrete are either be covered by an aggregate material (*e.g.*, gravel or limestone) or are well vegetated. Therefore, there are no apparent areas due to topography, activities or other factors have a high potential for significant soil erosion.

4.4 Good Housekeeping

Measures designed to maintain a clean, orderly, and safe work environment also contribute to the prevention of potential pollutant sources from coming into contact with and impacting storm water runoff. Good housekeeping also reduces the potential for accidental spills caused by mishandling of significant materials, thereby enhancing the safety of plant personnel. LaSalle Station is committed to following good housekeeping measures.

General order and cleanliness will be practiced throughout the facility site. Each employee will be responsible for keeping work areas clean and orderly. All debris and waste materials must be properly disposed of in designated waste receptacles for subsequent disposal. Equipment failures and required repairs will be addressed promptly. Procedural guidance for housekeeping at the station is provided in MA-AA-716-026, Station Housekeeping / Material Condition Program.

Loading/Unloading areas

The potential exists that materials such as bulk chemicals, gasoline and diesel fuel can be spilled or released during loading and unloading operations. Aboveground storage tanks are maintained within a secondary containment area or are double-walled. Loading and unloading operations that do not take place within a bermed area or drainage area that is routed to a process outfall will be done using drip pans at the point of connection during loading and unloading operations to prevent the unintentional spill or release of product. LAP-500-26, Receipt and Offloading of Bulk Chemical Shipments prescribes controls to ensure that offloadings are being performed in accordance with applicable EPA and State of Illinois regulatory requirements.

Material Storage and Handling Practices

Improperly stored materials can also result in the exposure of potential pollutants to storm water runoff. Sound storage methods and procedures will ensure that the potential for exposure is minimized. Procedural guidance for proper material handling practices is provided in SA-AA-121, General Material Handling and Storage. Also, LaSalle Station implements the following storage practices:

- All aboveground storage tanks such as the 2000 gallon gasoline and diesel fuel storage tanks located on the southeast side of the site are double walled or will be within impervious, secondary containment areas adequate enough to contain the volume of the single largest tank with sufficient freeboard to allow for precipitation.
- All materials, including salt used for de-icing in the winter months, will be stored and all chemicals clearly identified in secure locations away from direct traffic routes. Materials identified as hazardous substances will be stored under roof. Adequate aisle space will be maintained near all materials in order to provide easy and safe access for storage handling. In general, steel drums will be stored on pallets or other elevated surfaces to avoid direct contact with the ground surface, which may cause corrosion. Lids will be kept on all drums and containers during storage or when otherwise not in use. Under no circumstances will drums be utilized as waste receptacles unless they have been thoroughly cleaned of any remaining chemical residues and labeled as waste containers in accordance with applicable federal and state regulatory requirements. Liquid waste will be drummed and stored under roof for reuse or offsite disposal at an approved facility. Drum and other material storage areas will be kept clean at all times. Debris, trash, and other waste materials will be picked up and disposed of on a regular basis.

Employee Participation

Motivating and training employees to use good housekeeping techniques is essential to the effective implementation of each BMP. LaSalle Station encourages employee participation in the utilization of good housekeeping measures through periodic training and communication as outlined in this SWPPP.

4.5 Visual Inspections and Preventive Maintenance

Inspections

An annual facility inspection shall be performed to verify that all elements of the SWPPP, including the site map, potential pollutant sources, and storm water management practices are as presented in this plan. The inspection shall include the North and South Area Runoffs in addition to the remainder of the main site area, and the River Screen House area. Observations that require a response will be tracked in the station's CAPSYS program. An inspection report will be prepared along with documentation of any required response.

Inspections may be required at other times due to incidents such as equipment malfunctions, spills or construction activities. Reports shall be prepared for any additional inspections in the same manner as the annual inspection.

Inspections will be conducted by the Environmental Specialist or qualified designee and documented on the inspection form contained within this plan.

Preventive Maintenance

Scheduled preventive maintenance activities are necessary to correct problems prior to the exposure of a potential pollutant source(s) to storm water runoff. Defects or damage identified in equipment or storm water management controls will be tracked in the station's CAPSYS program.

Routine visual inspections as required by the NPDES permit ensure that key elements of the SWPPP are in place and working properly. Although the visual inspections are not intended to be exhaustive, they will be used by LaSalle Station to observe and verify the effectiveness of the selected management practices and controls in preventing contamination of storm water runoff, in conjunction with day-to-day good housekeeping and preventative maintenance practices

Follow-up and Repair

For items that are noted on the inspection, the appropriate plant personnel will take the appropriate actions to correct the item(s) in a timely fashion.

If evidence of leaks or spills is noticed, the source will be identified and immediately rectified.

Noting if the item has been corrected will provide follow-up for the item.

4.6 Employee Training and Communication

Station employees regularly receive training on good housekeeping practices in an industrial environment; and training is supplemented by the Station Housekeeping/Material Condition Program MA-AA-716-026. Members of the Operating Department receive specialized training in hazardous material spill response, which includes measures to prevent the spread of hazardous materials into storm water runoff.

Individuals responsible for wastewater management and chemical control, specifically the Environmental Specialists, will be trained on the contents of this plan. Other individuals may also receive Storm Water Pollution Prevention Plan training as deemed appropriate by the Environmental Specialist. Training will be administered by the Training Department.

Storm Water Pollution Prevention Plan training will be conducted initially as part of implementation of this plan and in accordance with TQ-AA-133, Environmental Training. Training records will be maintained in accordance with TQ-AA-205 Training Records.

Employee training is an integral element in the implementation of LaSalle Station's SWPPP. Well-informed and adequately trained employees at all levels of responsibility will ensure that the objectives of each component of the plan are effective in maintaining the integrity and effluent quality of storm water runoff from the station. SWPPP training should include the following:

- General spill prevention and response, spill notification procedures, and materials management practices;
- All applicable new employees shall receive spill management training as soon as possible.
- All employees to whom pollution prevention training is applicable will receive "refresher" training at least annually.

4.7 Record Keeping and Internal Reporting Procedures

Record keeping

The Environmental Specialist is responsible for all record keeping requirements associated with this plan. Recordkeeping requirements are provided in EN-MW-101-0001, Environmental Records for Illinois Facilities.

Reporting

In accordance with Special Condition No. 8 of the LaSalle Station NPDES permit, an annual report will be submitted to the IEPA that shall include the results of the annual inspection. The report shall also include documentation of any event that would have required an inspection, the results of the inspection, and any subsequent corrective actions.

If inspections are performed more frequently than required by special condition No. 8, the results shall be included as additional information in the annual report.

The Environmental Specialist will ensure that required documentation is properly completed and retained in accordance with the Standard Record Retention Schedule. Revisions to this plan and subsequent implementations will also be documented.

As explained above, significant spills, significant leaks, and other significant discharges of substances must be properly documented, maintained on site and made available for review with the SWPPP, as required. Records of visual inspections; Comprehensive Site Compliance Evaluations; plan revisions; and related implementations will be retained in accordance with the Standard Record Retention Schedule and made available for review with the SWPPP, as required.

The NPDES permit does not relieve the permittee (LaSalle Station) of the reporting requirements of 40 CFR 110 and 117, 40 CFR 302, from a release in excess of a Reportable Quantity.

- In accordance with 40 CFR 110.6 and 117.21, the permittee is required to notify the National Response Center (NRC) (1-800-424-8802) as soon as the company has knowledge of the discharge.
- Hazardous waste releases that could threaten human health or the environment must be reported immediately to the Illinois Emergency Management Agency (IEMA) at (217) 782-7860.
- Release of hazardous substances or extremely hazardous substances at or above the reportable quantity and releases of hazardous materials must be reported immediately to IEMA, as well as the applicable local emergency planning committee (LEPC).
- LaSalle Station must modify the SWPPP to include the following: a description of the release (including, but not limited to, the type and estimate of the amount of material released); an account of the circumstances leading to the release; and date of the release. Appendix F of the SWPPP contains an example form that may be used. Spill reports containing the specified information should be retained in Appendix F or otherwise incorporated into the SWPPP.
- Following a reportable release, the SWPPP must be reviewed to identify measures to prevent recurrence of the release and to determine if there are ways to improve response to a similar release. If appropriate, the SWPPP should be updated with any findings or improvements from the review.

4.8 Facility Security

Station security is maintained on a 24-hour basis. At various intervals during the day and night, patrols of the station property are conducted.

The LaSalle Station is staffed 24 hours and seven days per week. The station is lighted commensurate with a nuclear power generating station and enclosed by double perimeter security fencing. Gates are continuously manned by security and all personnel entering the facility are thoroughly screened.

Abnormal conditions observed during security inspection are reported to the Shift Manager.

SECTION 5.0

STORM WATER POLLUTION PREVENTION PLAN EVALUATION AND MONITORING REQUIREMENTS

5.1 Storm Water Analytical Testing Requirements

In accordance with the NPDES permit, no monitoring is required for the storm water outfalls at LaSalle Station.

5.2 Annual Site Inspection and Summary Report

One or more members of the SWPPP team will conduct a thorough site inspection once each year to evaluate and verify full compliance with the NPDES permit, and more often as necessary to achieve compliance.

Based upon observations made during the site compliance inspection, an evaluation of the effectiveness of controls, measures, and management practices will be made to determine whether modified, additional, or different controls, measures, or management practices are needed.

Upon completion of the annual site compliance inspection and review, a report must be prepared that summarizes the following:

- Scope of the inspection/evaluation;
- Personnel conducting and date(s) of the inspection/evaluation;
- Major observations relating to implementation of LaSalle Station's SWPPP;
- Actions taken or to be taken to revise LaSalle Station's SWPPP and to implement the associated changes;
- List of incidents of non-compliance (including tracking number); and
- In accordance with signatory requirements, certification of the verity of the comprehensive site compliance evaluation and summary report; and if incidents of non-compliance are not found, certification that LaSalle Station is in compliance with the SWPPP and the NPDES permit.

Annual site compliance evaluation reports should be maintained on site, and mailed to the appropriate address as specified in the NPDES Permit Special Condition 8.N:

5.3 SWPPP Revision and Subsequent Implementation

An IR will be generated for all incidents or situations of non-compliance or potential non-compliance identified in the annual compliance evaluation. In addition, the following points should be considered for review, inclusion in the SWPPP, and corrective action, as needed:

- The description in the plan of additional or new potential pollution sources not previously addressed and pollution prevention measures and controls necessary should be revised within two weeks of the comprehensive site evaluation;

- Changes in procedural operations must be implemented at the site in a timely manner for nonstructural measures and controls. and
- Pollution prevention measures that require construction of structural controls are allowed up to three years to implement.

In accordance with the NPDES permit, LaSalle Station must notify IEPA at any time the SWPPP does not meet the requirements of the permit conditions. After such notification, LaSalle Station shall make changes to the SWPPP and shall submit a written certification that the requested changes have been made. Unless otherwise provided, LaSalle Station shall have 30 days after notification to make changes to the SWPPP.

LaSalle Station shall amend the SWPPP whenever there is a change in construction, operation, or maintenance, which may affect the discharge of significant quantities of pollutants to the waters of the State, or if a facility inspection required by the NPDES permit indicates an amendment is needed.

5.4 Signatory Authority

NPDES permit Special Condition 8.J requires that the SWPPP include the signature and title of the person responsible for preparation of the plan and include the date of initial preparation and each amendment thereto.

FIGURE 1

Site Location Map

FIGURE 2

DRAINAGE AREA

FIGURE 3

DRAINAGE ZONES MAP

FIGURE 4

FACILITY GENERAL LAYOUT

FIGURE 5

RIVER SCREEN HOUSE DRAINAGE

APPENDIX A

NPDES PERMIT

APPENDIX B

CERTIFICATION OF ABSENCE OF NON-STORM WATER DISCHARGES

**CERTIFICATION OF ABSENCE OF NON-STORM WATER DISCHARGES
STORM WATER POLLUTION PREVENTION PLAN**

**Exelon Generation Company, LLC
LaSalle County Station, Marseilles, Illinois**

I certify under penalty of law that: (1) the outfalls and drainage areas covered by the NPDES permit and identified in this SWPPP have been evaluated for the presence of non-storm water discharges; (2) that any and all non-storm water discharges which are discharged from the outfalls and drainage areas are identified in the SWPPP; and (3) that no non-storm water discharges are made via the storm water outfalls covered by the NPDES permit, other than those non-storm water discharges duly authorized by the NPDES permit and identified in the SWPPP.

Harold T. Vinyard

Plant Manager (Type or print)

Harold T. Vinyard
Signature

(815)-415-3700

Area Code and Telephone No.

6-10-13
Date Signed

*Exelon Generation Company, LLC
LaSalle County Station*

APPENDIX C

EXAMPLE STORM WATER INSPECTION CHECKLIST

STORM WATER INSPECTION CHECKLIST

INSPECTOR(S): _____ DATE: _____ NPDES PERMIT No. IL0048151

I. PURPOSE

The Storm Water Inspection is performed and documented annually to meet the NPDES Permit requirements. Specifically, Special Condition 8 states:

"The permittee shall conduct an annual facility inspection to verify that all elements of the plan, including the site map, potential pollutant sources, and structural and non-structural controls to reduce pollutants in industrial storm water discharges are accurate."

The inspection scope focuses on the following elements for areas on the station property:

- a. Structural (Modifications) – Note any modifications, which may have redirected flow of storm water away from flowpath identified in the plan).
- b. Potential Pollutant Sources – Note any changes (*additional or elimination*) to potential pollutant sources identified in the plan.
- c. Structural Controls (Modifications, material condition) – Note any modifications, which may have redirected flow of storm water away from flowpath identified in the plan. Note any degraded, damaged, or compromised structures associated with storm water treatment/drainage. (e.g. silt intrusion into ditches, broken storm sewer covers).
- d. Non-Structural Controls – Note any changes to procedures, plans, or other non-structural controls which impact the plan.

II. GENERAL NOTES:

- a. Review conditions of ditches – look for silt intrusion, beaver dams, foreign substance intrusion, and unimpeded drainage function.
- b. Look at storm sewers and note material condition – write WRs as appropriate.
- c. The Protected Area has 2 types storm sewers:
 - I. "Oily" – Flowpath is to Oil Separators, original system, sewer covers are rounded, grate.
 - II. FIP – Flowpath is to Retention Ponds, newer system associated with Facilities Improvement Project, sewer covers are flat, grate. Look for oily substances entering the FIP drains.
- d. Look at most recent Dike Inspection performed by System Engineering. The inspection will encompass the peripheral ditches around the lake.

III. PROTECTED AREA (PA)

(Drawings S-117 through S-120, S-1282 through S-1288)

<u>CATEGORY</u> (Site Map, Potential Pollutant Source, Structural Control, Non- Structural Control)	<u>OBSERVATION</u>	<u>LOCATION</u>	<u>COMMENTS</u> (WRs, CRs, further required actions, etc...)

**IV. OUTSIDE PA - PARKING LOT, NORTH AREA BY STP/WWTF, RSH, MU/BD
LINE CORRIDOR, RETENTION PONDS, LAKE PERIPHERAL DITCHES, FISH
HATCHERY, FIRING RANGE)**

(Drawings S-30, S-31, S-102, S-1225, S-1282 through S-1288, S-1292 through 1294, S-1507, S-1550-C.1.1)

<u>CATEGORY</u> <i>(Site Map, Potential Pollutant Source, Structural Control, Non- Structural Control</i>	<u>OBSERVATION</u>	<u>LOCATION</u>	<u>COMMENTS</u> (WRs, IRs, further required actions, etc...)