

**South Carolina Department of Health and Environmental Control (SC DHEC)
Bureau of Air Quality (BAQ)**

**Response to Comments
Public Notices # 19-048-SOP-RE & OP-1900-0050 v2.0
Westinghouse Electric Company, LLC (Westinghouse)
Hopkins, Richland County, South Carolina
Permit No. OP-1900-0050 v2.0**

The following is the SC DHEC BAQ's (Department) response to comments made during the formal comment periods September 12, 2019, through October 11, 2019, and May 5, 2023, through June 18, 2023; the public meetings held on September 26, 2019, and June 6, 2023; and the public hearing held on June 6, 2023, regarding the draft state operating permit renewal for Westinghouse Electric Company, LLC (Westinghouse) located at 5801 Bluff Road in Hopkins, Richland County, South Carolina.

The Department Decision, permit, statement of basis, this response document, and a letter of notification are located for viewing at the SC DHEC Columbia office located at 2600 Bull Street, Columbia, SC 29201, and on our webpage at www.scdhec.gov/air-quality-permitting-decisions.

Hardcopies of all the above-listed documents, as well as the written comments received can be requested by contacting our Freedom of Information Office at (803) 898-3882.

No comments related to the draft air permit were received during the June 6, 2023, public hearing, nor during the May 5, 2023, to June 18, 2023, comment period.

The following is a summary of all comments received during the September 12, 2019, to October 11, 2019, comment period, and the Department's responses.

Permit Duration

Several comments were received requesting the duration of the air quality state operating permit be limited to less than 10 years.

RESPONSE: This facility qualifies as a minor source as defined by state and federal air quality regulations; therefore, this facility qualifies for a minor source air quality operating permit. The standard lifespan of a minor source operating permit is 10 years. The facility is required to request modification to the operating permit as needed for changes, and the Department can reopen the operating permit at any time to make revisions due to regulatory or operational changes. Because of the ability to update and change the operating permit as

needed, the Department does not believe there will be any environmental benefit to a less than 10-year permit term.

DHEC Notification

A comment was received requesting that the facility be required to report any process upsets immediately, not within 24 hours.

RESPONSE: State air quality regulations (S.C. Regulation 61-62.1, Section II.J.1.c) define the timeframe in which a facility must report process upsets that result in higher-than-normal air emissions. A verbal notification of the incident must be submitted within 24 hours and a full written report is required within 30 days. The written report shall include detailed information about the upset; see Permit Condition I.4.

In addition to the air permit, DHEC's Bureau of Land and Waste Management executed Consent Agreement #19-02-HW with Westinghouse on February 26, 2019, to formally address historical contamination and implement a protocol for communicating and responding to any contamination discovered in the future. Under the communication protocol, DHEC is to be notified if Westinghouse discovers a potential release into the environment from equipment failure or a spill. Since the protocol was put in place, Westinghouse has routinely gone beyond the requirements of the communication protocol by also notifying DHEC of situations that do not meet the reporting thresholds. For more information about the Consent Agreement, visit the Regulatory Roles page at: <https://www.scdhec.gov/Westinghouse>.

Air Pollution Impacts

A comment was received regarding the potential pollutant emissions from operations at this facility.

RESPONSE: As part of the technical evaluation of the permit application, potential emissions from all pollutants were calculated and compared to the National Ambient Air Quality Standards and the state Maximum Allowable Ambient Concentrations, which are established to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Westinghouse was required to conduct air dispersion modeling to demonstrate whether or not the facility can be operated such that all potential emissions can remain below the maximum allowable ambient concentration levels. The Department evaluated the modeling results and determined that all potential emissions are within the health-based air quality standards.

General Opposition Due to Previous Incidents

Comments were received stating that DHEC is expected to protect the community and should hold the facility responsible for previous incidents at the location by denying renewal of the permit.

RESPONSE: By statute, the Department's decision to issue an air permit must be based on the applicable air quality regulations and standards in place at the time of the Department's technical review of the permit application. State and Federal regulations are established to protect the health and welfare of the public and the environment. The Department ensures that the protective standards in place under the regulations can be met by a facility before an air permit is issued. If a facility meets all permitting requirements and demonstrates compliance with all applicable regulations, the S.C. Pollution Control Act requires DHEC to issue a permit.

The Department is aware of the facility's previous incidents and the concerns of the community. As such, the renewed air permit includes additional monitoring and more stringent requirements than the previous air permit.

As stated above, previous contamination and future releases to the groundwater, surface water, soils, and sediments on and around this facility's property are addressed by Consent Agreement #19-02-HW. For more information about the Consent Agreement, visit the Regulatory Roles page at: <https://www.scdhec.gov/Westinghouse>.

Well Testing

A comment was received regarding the potential impacts of wastewater leakage from the site, the potential for Uranium contamination, the location of testing wells, and where testing data for these wells could be viewed.

RESPONSE: While groundwater impacts are outside the purview of air quality permitting, the Department has the following response:

There are no known off-site impacts from operations or from environmental contamination at the Westinghouse site. While the testing of residential wells is not regulated by this permit, DHEC's Consent Agreement #19-02-HW with Westinghouse requires Westinghouse to conduct a comprehensive site-wide environmental assessment to fully determine the extent of contamination at the site, including the installation of onsite groundwater monitoring wells. The assessment report, also known as the Remedial Investigation Report or RI Report, was approved by DHEC on March 23, 2023. The next requirement under the consent agreement is for Westinghouse to submit a Feasibility Study Work Plan, which is due in mid-July 2023. Upon approval of this work plan, Westinghouse will prepare and submit a Feasibility Study or FS, which is a detailed evaluation of various cleanup alternatives that may

be appropriate for the site. For more information about the Consent Agreement, visit the Regulatory Roles page at: <https://www.scdhec.gov/Westinghouse>.

Radium is produced when other radioactive substances such as uranium break down over time. As this change occurs, radiation is given off. Radium is commonly found in two forms, Radium 226 and Radium 228. Radium also occurs naturally in certain rocks and soils. Several methods are available to remove radium from well water. Again, there are no known off-site impacts from operations or from environmental contamination at the Westinghouse site.

To view the residential well testing results, visit the History page at: <https://scdhec.gov/environment/environmental-sites-projects-permits-interest/westinghouse/westinghouse-history>. If you have questions concerning residential well testing results, please contact Keisha Long by phone at 803-898-0774 or by email at Longkd@dhec.sc.gov.

After careful consideration and review of the air permit application, supplemental information, state and federal air quality regulations, comments and concerns made at the public meeting, and other comments or questions received during the public comment period, the Department has determined there is sufficient information to make a permitting decision on the air quality state operating permit.