



FACT SHEET
Prepared by
California Department of Toxic Substances Control



For

Southern CA Edison San Onofre Nuclear Generating Station
5000 Pacific Coast Highway, San Clemente, California
January 2016

Facility/Unit Type:	Storage Facility
Waste Types:	RCRA and non-RCRA Wastes
Permit Type:	Full RCRA Hazardous Waste Permit

INTRODUCTION

This Fact Sheet has been prepared by the Department of Toxic Substances Control (DTSC) in accordance with California Code of Regulations (Cal. Code of Regs.), title 22, section 66271.7 to document the proposed RCRA hazardous waste permit renewal decision for the San Onofre Nuclear Generating Station (SONGS). SONGS is located at 5000 Pacific Coast Highway in San Clemente, CA.

In a permit application submitted in January of 2014, SONGS asked DTSC to renew its hazardous waste storage permit. This Fact Sheet provides the following:

- a brief description of the type of facility or activity which is the subject of the draft permit;
- a brief summary of the basis for the draft permit conditions;
- the type and quantity of hazardous wastes, which are proposed to be or are being stored;
- a description of the procedures for reaching a final decision on the draft permit;
- name and telephone number of a person to contact for additional information.

List of Acronyms

DTSC	Department of Toxic Substances Control
HSAW	High Specific Activity Waste
HWMU	Hazardous Waste Management Unit
LSAW	Low Specific Activity Waste
MPHF	Multi-purpose Handling Facility
RCRA	Resource Conservation and Recovery Act
SONGS	San Onofre Nuclear Generating Station
SWMU	Solid Waste Management Unit
SYF	South Yard Facility

FACILITY DESCRIPTION

SONGS is a nuclear power generating facility that is undergoing decommissioning. The facility operated three pressurized water nuclear reactors (Units 1, 2, and 3) and several smaller standby diesel generating units. The reactors provided thermal energy that produced steam, which was used to drive turbines. These turbines turned generators that produced electricity for the local power grid. Reactor Unit 1 operated from January 1, 1968 to November 30, 1992 and was shut down in 1992. Units 2 and 3 were constructed in 1974 and 1976, and ceased operation in 2013.

The decommissioning and decontamination (D&D) of the facility will result in the generation of hazardous waste, some of which will be contaminated with radio nuclides. This waste is referred to as Mixed Waste or Combined Waste. The D&D activities include the dismantling, removal and shipment of plant components.

Mixed Waste and Combined Waste detected with varying levels of radioactivity are stored in three storage areas as described in the Permit. The total quantity of Mixed Waste and Combined Waste that may be stored in these three storage areas is 62,250 gallons. Types of Mixed Waste and Combined Waste include, but not limited to, used oil, chemical solvents, lead solids, and asbestos.

Other hazardous wastes generated at the facility are not contaminated by any radioactive constituents. These hazardous wastes are stored onsite for less than 90 days and are exempt from hazardous waste storage permitting requirements. These wastes are not regulated by this Permit.

DTSC regulates the hazardous component of Mixed Waste and Combined Waste. The radioactive component is regulated by the Nuclear Regulatory Commission.

BASIS FOR DRAFT PERMIT CONDITIONS

The following section briefly describes the derivation of the conditions of the draft permit and the reasons for them. There are four types of conditions in the draft permit – General Conditions, Unit-Specific Special Conditions, Special Conditions, and Conditions for Corrective Action.

General Conditions (Part III)

Pursuant to California Health and Safety Code section 25200, the following general conditions are included in the draft Permit to help ensure that Facility operations will be in compliance with all applicable State laws and will be protective of human health and the environment.

- 1. The Part "A" Application dated July 23, 2015 and the Part "B" Application (Operation Plan), dated October 13, 2015 are hereby made a part of this Permit by reference.*
- 2. The Permittee shall comply with the terms and conditions of this Permit and the provisions of the Health and Safety Code and California Code of Regulations (Cal. Code Regs.), title 22, division 4.5. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.*
- 3. The Permittee is permitted to store hazardous wastes in accordance with the terms and conditions of this Permit. Any management of hazardous wastes not specifically authorized in this Permit is strictly prohibited.*
- 4. Compliance with the terms and conditions of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.*
- 5. DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.*
- 6. Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code section 25187.*
- 7. Failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Cal. Code of Regs, tit. 22, §66270.43).*
- 8. In case of conflicts between the Operation Plan and the Permit, the Permit conditions take precedence.*

9. This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

10. The Permittee shall certify annually that it has a hazardous waste reduction and minimization program and method in place and shall keep the annual certification as part of its Operating Record in accordance with California Code of Regulations, title 22, section 66264.73(b)(9).

11. DTSC, its contractors, employees, agents, and/or any United States Environmental Protection Agency representatives are authorized to enter and freely move about the Facility for the purposes of interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of Part VI of the Permit; conducting such testing, sampling, or monitoring as DTSC deems necessary; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Facility and any other property to which access is required for implementation of any provision of this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5, and shall allow such persons to inspect and copy all records, files, photographs, documents, including all sampling and monitoring data, that pertain to work undertaken pursuant to the entire Permit or undertake any other activity necessary to determine compliance with applicable requirements.

12. Nothing in this Permit shall limit or otherwise affect DTSC's right to access and entry pursuant to any applicable State or federal laws and regulations.

Unit-Specific Special Conditions (Part IV)

The following Unit-Specific Special Conditions are not covered elsewhere in the draft permit, but are included for each hazardous waste management unit (HWMU) to make the operating requirements more clear and enforceable.

1. The Caustics Cells and Acids Cell shall each store no more than 220-gallons of containerized mixed waste.

- This condition was added to ensure the cells have the appropriate amount of secondary containment capacity in compliance with Title 22 section 66264.175(b)(3)

2. When in use, the Caustic Cell and the Acids Cell must have placards clearly visible identifying the hazards of the Mixed Waste and/or Combined Waste in storage.

- This condition was added to ensure that incompatible hazardous waste are separated and in compliance with Title 22 section 66264.31

3. To assure availability of the secondary containment capacity, an operational limit of a combined total of 76,000 gallons shall be stored in Sections B and C.

- This condition was added to ensure Section B has the appropriate amount of secondary containment capacity in compliance with Title 22 section 66264.175(b)(3).

4. Spill control pallets and over packs shall be used to provide added secondary containment and separation for incompatible wastes.

- This condition was added to ensure the facility complies with Title 22 section 66264.177(c) when storing hazardous waste in the Low Specific Activity Waste (LSAW) or High Specific Activity Waste (HSAW) storage areas.

5. All mixed waste and/or combined waste stored in the HSAW must at all times remain in clear view from the room's viewing port.

- This condition was added to assist DTSC enforcement staff with inspections of the HSAW storage area.

Special Conditions (Part V)

The purpose of these conditions is to identify in detail any compliance schedule and special conditions that apply to the entire facility and all the units. These conditions may be used to modify and/or supplement the operation plan.

1. Adequate aisle space between container pallets and containers holding or designated to hold Mixed Waste and Combined Waste shall be maintained to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility in an emergency, and shall be no less than thirty-six (36) inches.

- This condition was added to help ensure the Permittee is in compliance with Title 22 section 66264.35.

2. Compliance with capacity requirements will be determined based on the number and types of containers placed into the storage areas. All containers will be assumed full for the purpose of determining compliance with the permitted unit capacity.

- This condition was added to help ensure the facility does not exceed the hazardous waste storage capacity stated in the permit and Part B and to make compliance determinations more consistent.

3. Containers shall be properly labeled according to the California Code of Regulations, title 22, section 66262.34, and may be stacked no greater than two high (double stacking).

- The Permittee stores and stacks different sizes of containers. This condition was added to help ensure the Permittee is in compliance with Title 22 section 66264.31.

4. The Permittee shall collect all rainwater and washwater accumulated within the authorized units within 24 hours of discovery and perform a waste classification of the rainwater and washwater and manage them accordingly. Collection events shall be documented in the

operating record and shall note, at a minimum, the date of discovery, collection date, and volume. The weekly inspections discussed in Section VI of the Operation Plan shall include inspection of sumps and any observations of liquids accumulating in the sumps.

- This condition was added to help ensure the Permittee operates in a manner that is in compliance with section 66264.175(b)(5)

5. As required under California Code of Regulations, title 22, section 66264.175(b)(1), a base shall underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation. In the event that any cracks, gaps or tears are detected in a hazardous waste management unit or a secondary containment system or device, repairs shall be initiated as soon as possible and completed within one week of discovery of the problem. The Permittee shall notify DTSC within 24 hours whenever a crack, gap or tear is found. Within seven days of discovery of the problem, the Permittee shall notify DTSC in writing of the corrective measures that have been taken.

- This condition was added to help ensure the facility complies with Title 22 section 66264.175(b)(1) and provides an acceptable time table for notifying DTSC and returning to compliance.

6. Only Combined Waste and Mixed Waste may be stored in the HazMat Area –SYF Sections A and B and the MPH LSAW and HSAW Areas.

- This condition was added to ensure the storage operations described in the permit are consistent with what are described in the Part B.

7. The Permittee is authorized to store Mixed Waste and Combined Waste at the designated storage units for up to a maximum of one calendar year from the date of acceptance, unless the Permittee obtains DTSC authorization for extended storage. To obtain authorization, the Permittee must submit a Storage Extension Request to DTSC no later than sixty (60) days prior to exceeding the one year storage limitation for any waste placed into the designated storage areas. Within 45 days of the receipt of the extension request, DTSC shall inform the Permittee in writing if the request is deficient and identify the specific information required. DTSC shall make a decision on the extension request within 120 days of the filing of a completed request. The Permittee shall be deemed to be in compliance with the storage time limit while the application is pending review by DTSC. The Storage Extension Request shall include:

- (a) The description of waste streams, waste codes, quantities, one-year storage expiration date, projected shipment date, and container identification of each waste container that will exceed the one year storage limitation;
- (b) The justification or statement of basis for requesting extended storage. The Permittee shall demonstrate the efforts being made to comply with the one-year storage requirement.

- This condition was added to address previous public concern regarding the long term storage of any type of radioactive waste at the facility and addresses the possibility of there being a lack of available offsite facilities that can accept Mixed Waste or Combined Waste from SONGS. This condition explains how Southern CA Edison may request an extension

from DTSC to store Mixed Waste or Combined Waste longer than a year if, for example, there are no offsite facilities available to accept the waste.

Corrective Action (Part VI)

The following conditions listed in this section are included in draft permits when corrective action **is not required** at the time of issuing the permit. They apply to the discovery of future releases and include requirements for reporting, assessment, access, and mitigation of newly discovered releases.

- 1. In the event the Permittee identifies an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWMUs) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.*
- 2. DTSC may require the Permittee to investigate, mitigate and/or take other applicable action to address any immediate or potential threats to human health and/or the environment and newly identified SWMUs or releases of hazardous waste and/or hazardous constituents. If and when corrective action is required at the Facility, the Permittee shall conduct corrective action under either a Corrective Action Consent Agreement or an Enforcement Order for Corrective Action issued by DTSC pursuant to Health and Safety Code sections 25187 and 25200.10.*
- 3. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part of the Permit from the present owner(s) of such property within 30 days of approval of any workplan for which access is required. "Best efforts" as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any workplan for which access is required, or of the date that the need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within 14 days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.*
- 4. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee's liability and obligation to perform corrective action including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.*

NEXT STEPS

DTSC encourages public comments and feedback on the draft Permit for the SONGS Facility before a final decision is made. Comments can be mailed or e-mailed to the DTSC staff listed below any time before the close of the public comment period, which begins on January 7th, 2016 and ends on February 24th, 2016. A public hearing will be held on February 11th for anyone that would like to provide comments or data in person on the draft Permit. The public hearing will take place at Concordia Elementary School located at 3120 Avenida Del Presidente in San Clemente, California 92672 and will begin at 6:00 pm.

After the public comment period has concluded, DTSC will respond to all public comments in writing. DTSC will notify the applicant and each person who has submitted written comments or requested notice of the final permit decision. This notice shall include reference to the procedures for appealing a decision on a permit.

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