

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

Maura T. Healey Governor

Kimberley Driscoll Lieutenant Governor Rebecca L. Tepper Secretary

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September 25, 2023

John Moylan
Site Vice President
Holtec Decommissioning International, LLC
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 202360

RE: Plymouth – 310 CMR 7.02 Air Quality Permitting

Dear Mr. Moylan;

I am writing regarding potential alternatives for disposing of wastewater at Pilgrim Station. Specifically, MassDEP writes to confirm that, if new equipment or if a change in a method of operation is proposed to facilitate evaporation of the reactor system process water at the facility that could emit regulated air pollutants, that equipment, or that change in a method of operation, may be subject to MassDEP Air Quality Permitting pursuant to 310 CMR 7.02.

The federal Clean Air Act (CAA) and U.S. Environmental Protection Agency (EPA) regulations (40 CFR 51.160), require each state to develop procedures for determining whether construction or modification of facilities will violate applicable portions of its air pollution control strategy (including its State Implementation Plan or SIP) or will interfere with attainment and maintenance of the National Ambient Air Quality Standards (NAAQS) established by the CAA. The types of facilities and equipment that are required to obtain Plan Approvals from MassDEP, based on capacity ranges and emissions, can be found at 310 CMR 7.02(4)(a) for Limited Plan Applications (LPAs) and 310 CMR 7.02(5)(a) for Comprehensive Plan Applications (CPAs). If an emission unit or facility is subject to MassDEP Plan Approval requirements, the facility will need to submit a completed Limited Plan Application (LPA) for Process Emissions, or Comprehensive Plan Application (CPA) for Process Emissions.

The Department recommends that Holtec contact the MassDEP Southeast Regional Office well in advance of making any physical or operational changes, if it chooses evaporation to dispose

of the Pilgrim Station reactor system process water, for the purpose of discussing Air Quality Permitting applicability and requirements pursuant to 310 CMR 7.02.

If you have any questions, please contact Seth Pickering at seth.pickering@mass.gov or (857) 202-0116. Thank you.

Sincerely,

Seth Pickering

MassDEP, Southeast Region Deputy Regional Director Bureau of Air and Waste

Ecc:

David Noyes, Holtec Patrick O'Brien, Holtec

Jack Priest, Mass Department of Public Health

MassDEP

Gary Moran – Deputy Commissioner
Millie Garcia-Serrano – Regional Director, Southeast Region
Christine Kirby – Assistant Commissioner, Bureau of Air and Waste
Gerard Martin – Deputy Regional Director, Southeast Region, Bureau of Water Resources
Mark Poudrier - Chief, New Source Review (NSR) – Air Permit Section, BAW, SERO