

## IWG update for 1/29/24 NDCAP

### 1. **Administrative announcement - [update]**

- Jennifer Barrelle has left state government, so EOHHS will find a replacement.
- EOED (Economic Development)/MOBD(Business Development) is continuing to fill vacancy.
- Responding to discussion at the last NDCAP meeting, we have learned that the Attorney General's Division of Open Government has scheduled webinar trainings on the requirements of the open meeting law. These dates and registration information can be found at the AGO website at <https://www.mass.gov/info-details/open-meeting-law-trainings>. The IWG members are not aware of whether the AGO will provide individual trainings to outside bodies; this question could be sent to [OMLTraining@mass.gov](mailto:OMLTraining@mass.gov).
- The dates are as follows:
  - Webinar – Wednesday, February 7, 12:30 – 2:00 PM
  - Webinar – Tuesday, February 27, 6:30 – 8:00 PM

### 2. **Reactor System Process Water evaporation**

- MassDEP has received letters regarding potential state regulatory oversight of evaporation and other issues at Pilgrim. MassDEP is reviewing these letters and coordinating as appropriate with relevant state and federal authorities. We are committed to working with all partners to ensure Holtec's decommissioning of the Pilgrim facility is protective of the environment and public health.
- Regarding evaporation, MassDEP is requesting that Holtec calculate and submit an analysis of the "potential to emit" for non-radiological air pollutant emissions resulting from the evaporation of the reactor process water occurring at the facility to determine potential applicability of MassDEP's air quality permitting regulations (*MassDEP will follow up with a letter to Holtec making this request that is currently under internal review.*)
- These calculations should include potential emissions of the pollutants detected during the Pilgrim Station reactor system water sampling conducted on April 5, 2023 and any additional pollutants that may have been released to the reactor system water since that time.
- An air quality plan approval is required from any person prior to constructing, substantially reconstructing, altering, or subsequently operating any facility or emission unit where such activity would result in an increase in potential emissions of a single air contaminant equal to or greater than one (1) ton per year.

### Surface Water Discharge Permit modification

- MassDEP is in the process of reviewing documents in preparation for issuing a final determination on Holtec's application for a permit modification to discharge decommissioning wastewater into Cape Cod Bay.
- The next step is for MassDEP to issue a final determination. There is no prescribed period for issuance. MassDEP's final determination would be subject to an

administrative appeal under M.G.L. Chapter 30A, the Massachusetts Administrative Procedures Act.

**3. Site assessment work plan/MCP - [update]**

- Responding to questions raised at the last NDCAP meeting, the Attorney General's Office, on behalf of MassDEP and DPH, provided comments on 1/19/24 on Holtec's site assessment work plan. The comments outline important substantive changes that Holtec must make to ensure that the Revised Work Plan complies with the terms of the Massachusetts Settlement Agreement. The next step is for Holtec to submit a final work plan for state approval.
- Response actions under the Massachusetts Contingency Plan (MCP, or M.G.L. c. 21E) are ongoing. The Phase II Comprehensive Site Assessment (which documents the nature and extent of contamination and contains a risk characterization) is due to be submitted by April 21, 2024.
- As previously reported, as part of cleanup actions, Holtec is conducting groundwater sampling, and the results will be included in status reports submitted to MassDEP.

**4. Other cleanup issues [no change]**

- DEP's asbestos section continues to be actively engaged in overseeing the demolition activity occurring at the site and is meeting regularly with the company to manage the asbestos discovery/identification and abatement/removal processes.
- MassDEP is continuing to evaluate Holtec's request to change to its wastewater disposal system to a Title 5 system.

**5. Public safety (MEMA) - [update]**

- MEMA continues to work with local partners on public safety planning.
- MEMA continues to work with former EPZ (emergency planning zone) towns and surrounding communities on their comprehensive emergency management plans (CEMP). MEMA and the town of Plymouth will be hosting Incident Command Training in early April.