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| Administrative Procedure | Number: A-28 | Date: June 18, 2004 R-July 10, 2006 |
|  | Revision Number: 01 | Approval: Charles Davis |
| | Title: Document Control Program | Author: Harry C. Barnes Jr. |

Document Control Program

1.0 **Purpose**

The purpose of this procedure is to provide a system and instructions of how the Document Control program is to be conducted at Hopewell Cogeneration Facility. In this way Documents will conform to a specific way of performing the activities related to the program.

2.0 **Scope**

This procedure covers all activities, and services associated with Hopewell Cogeneration Facility.

3.0 **Reference Documents**

Document Name

ANSI/ISO 14001-2004

SAP-049 (7/1/06)

4.0 **Document Control Introduction**

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4.2 Document Control Program

Hopewell Cogeneration Facility establishes and maintains procedures for controlling all documents required by the ISO standard to ensure that:

- They can be located
- They are periodically reviewed, revised as necessary and approved for adequacy by authorized personnel
- Current versions of relevant documents are available at all locations where operations essential to the effective functioning of the environmental management system are performed
- Obsolete documents are promptly removed from all points of issue and points of use, or otherwise assured against unintended use
- Any obsolete documents retained for legal and/or knowledge preservation are suitably identified
- Documents that are under the control of HCF will be arranged in the computer system such that information can be obtained, but not changed except for those who have control of those documents.

Documents shall be legible dated and readily identifiable, maintained in an orderly manner and retained for a specified period. Procedures and responsibilities shall be established and maintained concerning the creation and modification of the various types of documents.

5.0 Document Control Program Summary Tables

5.1 Glossary and terms

| | |
|--|---|
| <i>Accountability</i> | Obligation to report on performance of task or process |
| <i>Checklist or Other Verification Tools</i> | Checklists, forms, or other techniques for documenting the results of a task or process |
| <i>Document</i> | When information is placed on a medium it becomes a document. The term can refer to paper or electronic media. For the purposes of this program documents include; permits, plans, procedures and other like kind information or guidance which governs or impacts the facility |
| <i>Information</i> | Must be informed of the status or outcome of the task or process |
| <i>Internal Performance Criteria</i> | Suez's internal standards and operating guidelines (SAP's) |

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| <i>Glossary and terms (Continued)</i> | |
|--|--|
| <i>Objectives</i> | Annual goals for a given risk or area of performance |
| <i>Operational Controls</i> | Documented procedures, manuals, and other reference materials |
| <i>Record</i> | A record is a document containing objective evidence which shows how well activities are being performed or what kind of results are being achieved. A record always documents what has happened in the past. Records can include completed inspection forms, training sign-in sheets, agency correspondence and test reports. |
| <i>Responsibility</i> | Duty to perform a task that may be delegated by the person with accountability |
| <i>Risk, Emerging</i> | Area where legal requirements do not yet exist and regulator/public awareness is still developing |
| <i>Risk, Environmental</i> | Strong possibility of impairment or alteration of the natural environment |
| <i>Risk, Financial</i> | Strong possibility of costs to Hopewell Cogeneration Facility exceeding \$100,000 |
| <i>Risk, Legal</i> | Strong possibility of noncompliance with legal requirements and/or civil liability |
| <i>Risk, Public Image</i> | Strong possibility of negative media exposure and damage to Hopewell Cogeneration Facility's reputation |
| <i>Support</i> | Assists those with responsibilities and accountabilities; i.e., a resource |

Program Specific Terms

| | |
|--------------------------|---|
| <i>Ambient regulated</i> | Emission has associated ambient air quality limits |
| <i>CGA</i> | Cylinder Gas Audit |
| <i>CO</i> | Carbon monoxide |
| <i>CO2</i> | Carbon dioxide |
| <i>DCR</i> | Discharge Control Report, 12 month rolling average of all parameters for all Gas Turbines, SPSG's, Diesels and fuel tanks |
| <i>DMR</i> | Discharge Monitoring Report, the monthly VPDES report including storm water |
| <i>EDR</i> | Electronic Discharge Report, the electronic quarterly air report that goes directly into the EPA computer |

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| Glossary and terms (Continued) | |
|---------------------------------------|--|
| <i>Fugitive Emission</i> | Unexpected or uncontrolled emission source |
| <i>HAPS</i> | Hazardous Air Pollutants, these are normally products of combustion |
| <i>Linearity</i> | Emission equipment checks, the linearity checks are to the Gas Turbines as the CGA is to the SPSG's |
| <i>NOx</i> | Nitrogen oxides (NO and NOX) |
| <i>PM</i> | Particulate Emission |
| <i>POTW</i> | Public Owned Treatment Works (Wastewater) |
| <i>RATA</i> | Relative Accuracy Test Account for testing emissions equipment for the SPSG's and GT's |
| <i>SO2</i> | Sulfur Dioxide |
| <i>Source regulated</i> | Emission has associated legal limits for source (stack) concentrations and emission rates |
| <i>Title V</i> | Upgraded air permit for the plant, starting in 2001 |
| <i>TRI</i> | Toxic Release Inventory, an government program to collect information on industrial pollutant releases |
| <i>TRI</i> | Toxic Release Inventory, annual stack emissions report part of SARA community right to know |
| <i>TSS</i> | Total Suspended Solids as part of the water report |

5.2 Hopewell Cogeneration Facility Document Control – Legal and Other Requirements. Under Suez SAP-018 all Environmental Documents are to be held for at least 8 years except for items required by OSHA or EPA to be maintained for the life of the plant. Otherwise use the limit list below for items not applicable under the above criteria.

| Document | Applicable Legislation & Guidelines | | | Standards |
|-------------------------------------|--|--------------|-------------------------------|---|
| | Federal | State | Suez and HCF Standards | Limits |
| Acute and Chronic Testing (records) | | S071 | | Both are 48 hour composites, the calculations will be using the LC50 and be reported in TU = 100/LC50. There is no set limit (Pass or Fail); the test is once a year and no quarterly testing in case of failure. |
| Air Certificate (Record) | | S045 | | Annual certificate sent to both the DEQ and EPA. |
| Air Permit | Title V of the Clean Air Act | | | Renewed every 5 years |
| Annual Air Emission Report (Record) | | S013 | | Due by March 1, form sent out by the state. |
| Annual Lab Test (Chlorine and TSS) | | S111 | | In Standard Methods of Water and Wastewater Testing |

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| Document | Federal | State | Suez and HCF Standards | Limits |
|---|--------------|--------------|------------------------|--|
| CGA (Records) | | S028 | | Cylinder Gas Audit, Quarterly |
| DCR (Records) | | S084 S111 | | Discharge Control Report, checks the Air Permit limits with what was produced on a 12 month rolling average. Monthly |
| DMR (Records) | | S112 | | Monthly |
| EDR (Records) | F023 | | | Quarterly |
| Emergency Evacuation Plan | F058 | | SAP-006 SAP-011 | Review every 3 years. |
| External Fuel Tank Inspection (Record) | F080 | | | Required every 5 years |
| Fire Prevention Preplans | F058 | | SAP-011 | |
| Fuel Tank Dike Wall Inspection (Record) | F080 | | | Required every 5 years |
| Fuel Tank Registration (Record) | | S109 | | Required every 5 years |
| Ground Water Report (Record) | F080 | | | Required every year |
| Hazard Assessment | F058 | | SAP-011 | Annually |
| Integrated Contingency Plan | F009 F065 | | | Required every 5 years |
| Internal Fuel Tank Inspection (Record) | F080 | | | Required every 10years |
| Lab Hygiene Manual | F058 | | SAP-011 | Review every 3 years |
| Linearity (Record) | | S028 | | Quarterly |
| NOx Annual Report (record) | F026 | S002 | | Annually by 30 November |
| Piping Hydro (Record) | F080 | | | Required every 5 years |
| Plant O&M Manual | | | TPI Memo | Every 5 years (Good Engineering Practice) |
| POTW (Record) | | | L004 | Annually |
| POTW Permit | | | L004 | Every 5 years |
| Quarterly Air Report (Record) | | S025 | | Quarterly |
| RATA (Record) | | S028 | | Annually for both Boilers and Gas Turbines |
| Safety Manual | F058 | | SAP-011 | Review every 3 years, being review and rewritten |
| SARA Title III Tier II Report (Record) | F074 | | | Annually by 1 July |
| Semi-Annual Air Report (Record) | | S041 | | Semi-Annual in February and August |
| Solid Waste Management Plan | F010 | | | Review every 3 years |
| Steam Analysis to Aqualon (Record) | | | C002 | Monthly |
| Storm Water Pollution Prevention Plan | F067 | | | Every 3 years has to be signed by PE |
| Storm Water Testing (Record) | | S058 S059 | | Quarterly, use forms for visual |
| TRI Report (Record) | F081 | | | Annually before 1 July |
| Waste Water O&M Manual | F067 | | | Every 3 Years |

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| Document | Federal | State | Suez and HCF Standards | Limits |
|----------------------------|---------|-------|------------------------|----------------------------------|
| Water Certificate (Record) | | S098 | | Annually, held on sit with DMR's |
| Water Permit | F073 | | | Required every 5 years |

5.2 Hopewell Cogeneration Facility Document Control – Objectives, Targets and Management Programs

Note: Once the implementation is complete the Objective/Target of this program will have been met, then it becomes ongoing maintenance from that point on.

5.3.1 Issue: Implementing

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|---|--|
| OBJECTIVE | To list all documents, manuals, and other procedures such that they are identified, cross-referenced and properly marked so that the documents can be controlled. |
| TARGET | To have all documents deemed necessary under document control before 2005 |
| ENVIRONMENTAL ASPECT | Less chance that manuals and documents will be out of date or get mixed up with out of date manuals. |
| ENVIRONMENTAL IMPACT | Better operating Safety and Environmental program. |
| CURRENT ENVIRONMENTAL PERFORMANCE | All documents are up to date, but are not identified, cross-referenced, or properly marked. |
| LEGAL & OTHER REQUIREMENTS | All documents in this program have a review date and many documents have a required retention |
| VIEWS OF INTERESTED PARTIES (INTERNAL AND EXTERNAL) | Federal Environmental Protection Agency (EPA) Virginia Department of Environmental Quality (DEQ) Hopewell Local Emergency Planning Committee (LEPC) Suez Energy Generation NA Hopewell Cogeneration Facility |
| BUSINESS, FINANCIAL & OPERATIONAL CONSTRAINTS | Maintaining this program so that old copies are not kept in place of new or revised copies. Maintaining good records. |

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| CORPORATE ENVIRONMENTAL POLICY | Achieve on going improvements in eco-efficiency. |
| ACTION PLAN | <ol style="list-style-type: none"> 1. Identify all documents, manuals, etc. 2. Make up cross-reference table. 3. Make up a marking system to identify documents in this program. 4. Implement the program. 5. Conduct training 6. Get feedback, have an audit conducted 7. Make corrections. 8. Maintain the program. |
| ASSIGNED RESPONSIBILITY | Action Plan: Chuck Barnes Audit: Jeanette Gibson |
| RESOURCES REQUIRED | Access to all files and manuals |
| ANTICIPATED COMPLETION DATE | September 3, 2004 |
| MONITORING / MEASUREMENT | <ol style="list-style-type: none"> 1. Review progress at plant manager staff meetings 2. Have administrative assistant to check for out of date material. 3. Conduct training so that plant personnel will be aware and will also look out for out of date material. 4. Review of this management program along with the other EMS programs. |

5.4 Hopewell Cogeneration Facility Document Control Program - Responsibilities

| Document Name | Responsible for update/rewrite | Responsible for checking/proof-reading | How often does this document have to be updated |
|----------------------------|---------------------------------------|---|--|
| Acute and Chronic Testing | State during permit renewal | State auditor | Every 5 years |
| Air Certificate | Environmental Rep. | Environmental Committee member | Annually |
| Air Permit | State during permit renewal | State auditor | Every 5 years |
| Annual Air Emission Report | Environmental Rep. | Plant Manager | Annually |

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| Document Name | Responsible for update/rewrite | Responsible for checking/proof-reading | How often does this document have to be updated |
|---------------------------------------|---------------------------------------|---|--|
| Annual Lab Test (Chlorine and TSS) | Environmental Rep. | N/A | Annually |
| CGA | I&C Tech. | Senior I&C Tech. | Quarterly |
| DCR | Environmental Rep. | Plant Manager | Monthly |
| DMR | Environmental Rep. | Plant Manager | Monthly |
| EDR | Senior I&C Tech. | Electronic Check | Quarterly |
| Emergency Evacuation Plan | Safety Rep. | Members of the Safety Committee | Annual |
| External Fuel Tank Inspection | Environmental Rep. | Licensed Inspectors | 5 years |
| Fire Prevention Preplans | Safety Rep. | Members of the Safety Committee | 3 years |
| Fuel Tank Dike Wall Inspection | Environmental Rep. | Licensed Inspectors | 5 years |
| Fuel Tank Registration | Environmental Rep. | Plant Manager | 5 years |
| Ground Water Report | Environmental Rep. | Licensed Inspectors | Annually |
| Hazard Assessment | Safety Rep. | Members of the Safety Committee | Review annually |
| Integrated Contingency Plan | Environmental Rep. | Licensed PE | 5 years |
| Internal Fuel Tank Inspection | Environmental Rep. | Licensed Inspectors | 10 years |
| Lab Hygiene | Environmental Rep. | Environmental Committee Member | 3 years |
| Linearity | I&C Tech. | Senior I&C Tech. | Quarterly |
| NOx Annual Report | Environmental Rep. | NOx Account Manager | Annually |
| Piping Hydro | Environmental Rep. | Licensed Inspectors | 5 years |
| Plant O&M Manual | Safety Rep. | Safety Committee Members | 5 years |
| POTW | Environmental Rep. | Plant Manager | Annually |
| POTW Permit | Environmental Rep. | Plant Manager | 5 years |
| Quarterly Air Report | Environmental Rep. | Plant Manager | Quarterly |
| RATA | Senior I&C Tech. | Licensed Testers | Annually |
| Safety Manual | Safety Rep. | Safety Committee Members | 5 years |
| SARA Title III Tier II Report | Environmental Rep. | Plant Manager | Annually |
| Semi-Annual Air Report | Environmental Rep. | Plant Manager | Semi-Annually |
| Solid Waste Management Plan | Environmental Rep. | Environmental Committee member | 3 years |
| Steam Analysis to Aqualon | Environmental Rep. | Plant Manager | Monthly |
| Storm Water Pollution Prevention Plan | Environmental Rep. | Licensed PE | 3 years |
| Storm Water Testing | Environmental Rep. | Plant Manager/Lab | Quarterly |
| TRI Report | Environmental Rep. | Plant Manager | Annually |

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| Document Name | Responsible for update/rewrite | Responsible for checking/proof-reading | How often does this document have to be updated |
|------------------------|---------------------------------------|---|--|
| Waste Water O&M Manual | Environmental Rep. | Environmental Committee member | 3 years |
| Water Certificate | Environmental Rep. | Plant Manager | Annually |
| Water Permit | Environmental Rep. | State Permit Writer | 5 years |

5.5 Hopewell Cogeneration Facility Document Control Program - Training and Awareness

| Document Name | Is special training required for this document? | Who need the special training? | List the training requirements necessary |
|------------------------------------|---|---|--|
| Acute and Chronic Testing | Knowledge of how to take the sample, outlined in Procedure E-22 | Operators and Environmental Rep. | OJT, and knowledge of Procedure E-22 |
| Air Certificate | Knowledge of how to fill out the Certificate from S045 and Procedure E-01 | I&C and Environmental Rep. | OJT, and knowledge of the regulations in S045 and Procedure E-01 |
| Air Permit | Knowledge of all air regulations, and where the forms are for the permit. | Environmental Rep. | Work with the state permit writer |
| Annual Air Emission Report | Knowledge of Federal Computer Program | Environmental Rep | OJT, knowledge of the Federal computer program and Procedure E-02 |
| Annual Lab Test (Chlorine and TSS) | Knowledge of how to take the sample, outlined in Procedure E-26 and E-31 | Operators and Environmental Rep. | OJT, and knowledge of Procedure E-26 and E-31 |
| CGA | Knowledge of how to run the CGA and Procedure E-06 | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-06 |
| DCR | Knowledge of how to run the DCR program and Procedure E-12 | Operators and Environmental Rep. | OJT, and knowledge of Procedure E-12 |
| DMR | Knowledge of how to take the sample, outlined in Procedure E-22, and E-27. Have knowledge of Third Class Wastewater License | Third Class License holders, and Environmental Rep. | OJT, and knowledge of Procedure E-22, E-27. Third Class Wastewater Training and Test |
| EDR | Knowledge of how to run the EDR program and Procedure E-05 | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-05 |

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| Document Name | Responsible for update/rewrite | Responsible for checking/proof-reading | How often does this document have to be updated |
|--------------------------------|---|---|--|
| Emergency Evacuation Plan | Knowledge of Procedure S-04 | Operators and Safety Rep. | OJT, and knowledge of Procedure S-04 |
| External Fuel Tank Inspection | Document can be done by example of Procedure O-11. The Testing has to be done by a licensed inspector. | | UDT training and a tank license. |
| Fire Prevention Preplans | Knowledge of Procedure S-04 and S-15 | Operators and Safety Rep. | OJT, and knowledge of Procedure S-04 Chapter 14 and S-15 |
| Fuel Tank Dike Wall Inspection | Document can be done by example of Procedure O-11. The Testing has to be done by a licensed inspector. | | UDT training and a tank license. |
| Fuel Tank Registration | Document can be done by example of Procedure O-13. | Anyone or the Environmental Rep. | OJT, and knowledge of Procedure O-13 |
| Ground Water Report | Have to have working knowledge of Well Testing and document knowledge from Procedure O-05 | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure O-05 |
| Hazard Assessment | Knowledge of Procedure S-02 | Operators and Safety Rep. | OJT, and knowledge of Procedure S-02 |
| Integrated Contingency Plan | Have to have working knowledge of Well Testing and document knowledge from Procedure O-15 and S-04 Chapter 25 | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure O-15 and S-04 Chapter 25 |
| Internal Fuel Tank Inspection | Document can be done by example of Procedure O-11. The Testing has to be done by a licensed inspector. | | UDT training and a tank license. |
| Lab Hygiene | Knowledge of Procedure S-16 | Environmental Rep. Operators and Safety Rep. | OJT, and knowledge of Procedure S-16 |
| Linearity | Knowledge of how to run the Linearity Test and Procedure E-06 | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-06 |
| NOx Annual Report | Knowledge of how to run the NOx program and Procedure E-03 | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-03 |

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| Document Name | Is special training required for this document? | Who need the special training? | List the training requirements necessary |
|-------------------------------|--|--|---|
| Piping Hydro | Document can be done by example of Procedure O-11. The Testing has to be done by a licensed inspector. | | UDT training and a tank license. |
| Plant O&M Manual | Document can be done by example of Procedure O-18. | Anyone or the Environmental Rep. | OJT, and knowledge of Procedure O-18 |
| POTW | Document can be done by example of Procedure O-16. | Anyone or the Environmental Rep. | OJT, and knowledge of Procedure O-16 |
| POTW Permit | Document can be done by example of Procedure O-14. | Anyone or the Environmental Rep. | OJT, and knowledge of Procedure O-14 |
| Quarterly Air Report | Knowledge of how to run the Air Report and Procedure E-04 | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-04 |
| RATA | Knowledge of how to run the RATA program and Procedure E-06 | Has to be run with a testing company, with license Stack Testers | OJT, and knowledge of Procedure E-06. Reports are written by the stack testing company. HCF forwards to DEQ |
| Safety Manual | Knowledge of how to run the Safety program and Procedure S-04 | Anyone and the Safety Rep. | OJT, and knowledge of Procedure S-04 |
| SARA Title III Tier II Report | Knowledge of how to run the SARA program and Procedure E-19 | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-19 |
| Semi-Annual Air Report | Knowledge of how to run the Air Report program and Procedure E-08 | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-08 |
| Solid Waste Management Plan | Knowledge of how to run the Solid Waste program and Procedure E-23 | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-23 |
| Steam Analysis to Aqualon | Document can be done by example of Procedure A-11. | Anyone or the Environmental Rep. | OJT, and knowledge of Procedure A-11 |

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| Document Name | Is special training required for this document? | Who need the special training? | List the training requirements necessary |
|---------------------------------------|---|---------------------------------------|--|
| Storm Water Pollution Prevention Plan | Knowledge Storm Water Pollution Prevention Plan, Water Permit and Procedure E-32. | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-32, and the Water Permit. |
| Storm Water Testing | Knowledge of how to run the Storm Water Test and Procedure E-32. Lab test are run by an outside Lab. | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-32. Lab Work is done out side. |
| TRI Report | Knowledge of how to run the TRI program and Procedure E-19 | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-19 |
| Waste Water O&M Manual | Knowledge Storm Water Pollution Prevention Plan, Water Permit and Procedure E-32. | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-32, and the Water Permit. |
| Water Certificate | Knowledge Storm Water Pollution Prevention Plan, Water Permit and Procedure E-25. | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-25, and the Water Permit. |
| Water Permit | Knowledge Storm Water Pollution Prevention Plan, Water Permit, Previous Water Permits and Procedure E-24. | Environmental Rep. And I&C Tech. | OJT, and knowledge of Procedure E-24, and the Water Permit. |

Plant Manager (PM)
 Technical Support Supervisor (TSS)
 Production Support Supervisor (PSS)
 Instrument and Control Technician (I&C Tech)
 Optech.1 and 2 (Operators)

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5.6 Hopewell Cogeneration Facility Document Control Program - Operational Controls

| Document Name | Procedure Number | Related Procedures or Operating Bulletins | Related Instruction Manual(s) | Checklist or Other Verification Tools |
|------------------------------------|---|--|--|--|
| Acute and Chronic Testing | Procedure E-22 | | Water Permit | Procedure is outlined in the water permit and Procedure E-22 |
| Air Certificate | Procedure E-01 | | Air Permit | Use previous years certificates as a model and the Procedure E-01 and the Air Permit |
| Air Permit | Procedure E-24 | Title V of the Clean Air Act | | Forms found on DEQ Web-site for Air Permit Application. |
| Annual Air Emission Report | Procedure E-02 | Information sent by DEQ | Air Permit | Forms and Program provided by DEQ |
| Annual Lab Test (Chlorine and TSS) | Procedures E-26 and E-31 | Manufactures Bulletins | Water Permit, Standards manual | Procedures and previous years testing as a model |
| CGA | Procedure E-06 | MP2 | Manufacture's operating instructions for emissions equipment | Procedure E-06 and 40 CFR part 60 |
| DCR | Procedure E-12 | | Air Permit | The DCR is the check list for all the air parameters |
| DMR | Procedure E-27 | DEQ Water Bulletins | Water Permit | Class III wastewater Course and Material. |
| EDR | Procedure E-05 | DEQ and EPA operating instructions | 40 CFR part 75 CEM equipment manufacture Rep. (Help line) | Electronic Checking system from EPA |
| Emergency Evacuation Plan | Procedure S-04 Chapters 10 and 11, Procedure S-14 | | Information on OSHA Web-site | Emergency Manual Index is the best Check list |
| External Fuel Tank Inspection | Procedure O-11 | Manufacture's drawings | API-653 Instructions for tank and other inspections | This has to be preformed by a licensed company, they have the check list. |
| Fire Prevention Preplans | Procedure S-04 Chapters 14 and S-15 | Examples in OSHA Web site | | |

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| Document Name | Procedure Number | Related Procedures or Operating Bulletins | Related Instruction Manual(s) | Checklist or Other Verification Tools |
|--------------------------------|------------------------------------|--|--|---|
| Fuel Tank Dike Wall Inspection | Procedure O-11 | Manufacture's drawings | API-653 Instructions for tank and other inspections | This has to be preformed by a licensed company, they have the check list. |
| Fuel Tank Registration | Procedure O-13 | DEQ Web-site | | |
| Ground Water Report | Procedure O-05 | | | Well Forms and report forms |
| Hazard Assessment | Procedure S-02 | OSHA Web-site | | |
| Integrated Contingency Plan | Procedure O-15 and S-04 Chapter 25 | | | Example in 40 CFR 112 |
| Internal Fuel Tank Inspection | Procedure O-11 | Manufacture's drawings | API-653 Instructions for tank and other inspections | This has to be preformed by a licensed company, they have the check list. |
| Lab Hygiene | Procedure S-04 Chapter 26 and S-16 | | | |
| Linearity | Procedure E-06 | MP2 | Manufacture's operating instructions for emissions equipment | Procedure E-06 and 40 CFR part 75 |
| NOx Annual Report | Procedure E-03 | MP2 | DEQ and EPA operating instructions for NOx emissions | Procedure E-06 and 40 CFR part 79 |
| Piping Hydro | Procedure O-11 | Manufacture's drawings | API-653 Instructions for tank and other inspections | This has to be preformed by a licensed company, they have the check list. |
| Plant O&M Manual | Procedure O-18 | OEM information (Blue Books on site) | | |
| POTW | Procedure O-16 | | Hopewell Regional Waste Water Treatment Forms | |
| POTW Permit | Procedure O-14 | | Hopewell Regional Waste Water Treatment Forms | |
| Quarterly Air Report | Procedure E-04 | Air Permit | | 40 CFR part 60 |

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|  | Administrative Procedure | Number: A-28 | Date: June 18, 2004 R-July 10, 2006 |
| | | Revision Number: 01 | Approval: Charles Davis |
| | | Title: Document Control Program | Author: Harry C. Barnes Jr. |

| Document Name | Procedure Number | Related Procedures or Operating Bulletins | Related Instruction Manual(s) | Checklist or Other Verification Tools |
|---------------------------------------|-------------------------|--|---|--|
| RATA | Procedure E-06 | RATA Protocol | | 40 CFR Parts 60 and 75 |
| Safety Manual | Procedure S-04 | | | OSHA Training Requirements |
| SARA Title III Tier II Report | Procedure E-19 | | Tier II Forms | |
| Semi-Annual Air Report | Procedure E-08 | Air Permit | | |
| Solid Waste Management Plan | Procedure E-23 | | | |
| Steam Analysis to Aqualon | Procedure A-11 | | | Check list supplied by Water Treatment Vendor |
| Storm Water Pollution Prevention Plan | Procedure E-32 | Water Permit | | Water Permit Storm water section |
| Storm Water Testing | Procedure E-32 | Water Permit | | Water Permit Storm water section |
| TRI Report | Procedure E-19 | MSDS Sheets | Instructions and electronic program supplied by EPA | Electronic Forms |
| Waste Water O&M Manual | Procedure E-32 | Water Permit | | Water Permit Storm water section |
| Water Certificate | Procedure E-25 | Water Permit | | |
| Water Permit | Procedure E-24 | Water Permit | Water Permit Renewal forms on DEQ Web-site | Instructions that go with the forms and information in the old permit. |

5.7 Hopewell Cogeneration Facility Document Control Program - Measuring & Monitoring

| Document Name | Monitoring Method | Monitoring Frequency | Primary Responsibility | Control Document file location |
|---------------------------|-------------------------------|-----------------------------|-------------------------------|--|
| Acute and Chronic Testing | Environmental Rep. Check-List | Annual (No retest required) | Environmental Rep. and Lab | Filed with DMR's |
| Air Certificate | Environmental Rep. Check-List | Annual | Environmental Rep. | HCF-fileserver\company\public\Air\ Annual Cert \Yr 20xx \Annual Compliance Certification |

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|  | Revision Number: 01 | Approval: Charles Davis |
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| Document Name | Monitoring Method | Monitoring Frequency | Primary Responsibility | Control Document file location |
|------------------------------------|--|-----------------------------|-------------------------------|--|
| Air Permit | Environmental Rep. Check-List | Every 5 years | Environmental Rep. | HCF-fileserver\ company \public \Air\Title V permits |
| Annual Air Emission Report | Environmental Rep. Check-List | Annual | Environmental Rep. | HCF-fileserver\ company \public \Air\ Inventory & Form R\Yrxx \Calcs04 update for 2005 |
| Annual Lab Test (Chlorine and TSS) | Environmental Rep. Check-List | Annual | Environmental Rep. | HCF-fileserver\ company \public \Chemistry \Lab signs |
| CGA | Environmental Rep. Check-List and I&C PM | Quarterly | Senior I&C Tech. | Filed as part of the quarterly air report. |
| DCR | Environmental Rep. Check-List | Monthly | Environmental Rep. | HCF-fileserver\ company \public \Excel \ Reports \DCR \DCR Rolling Averages |
| DMR | Environmental Rep. Check-List | Monthly | Environmental Rep. | HCF-fileserver\ company \public \ Environmental \ Water\ DMR \Yrxx\ files. Past DMR are in Notebooks in the Safety and Environmental Office |
| EDR | Environmental Rep. Check-List and I&C PM | Quarterly | Senior I&C Tech | On File in the CEM Computer |
| Emergency Evacuation Plan | Safety Rep. Check-List | Every 3 years | Safety Rep. | HCF-fileserver\ company \public \Manuals \Evacuation – Emergency Manual |
| External Fuel Tank Inspection | Environmental Rep. Check-List | Every 5 years | Environmental Rep. | All Reports filed in Administrative File 11.1, and in the Safety & Environmental Office in cabinet B1 |

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|  | Revision Number: 01 | Approval: Charles Davis |
| | Title: Document Control Program | Author: Harry C. Barnes Jr. |

| Document Name | Monitoring Method | Monitoring Frequency | Primary Responsibility | Control Document file location |
|--------------------------------|--|-----------------------------|-----------------------------------|---|
| Fire Prevention Preplans | Safety Rep. Check-List | Every 3 years | Safety Rep. | HCF-fileserver\company\public\Fire & Extinguishers\Preplans |
| Fuel Tank Dike Wall Inspection | Environmental Rep. Check-List | Every 5 years | Environmental Rep. | All Reports filed in Administrative File 11.1, and in the Safety & Environmental Office in cabinet B1 |
| Fuel Tank Registration | Environmental Rep. Check-List | Every 5 years | Environmental Rep. | HCF-fileserver\company\public\Environmental\Oil\Tank Registration 08 |
| Ground Water Report | Environmental Rep. Check-List | Annually | Environmental Rep. | HCF-fileserver\company\public\Environmental\Oil\ (wells and AST files) |
| Hazard Assessment | Safety Rep. Check-List | Annually | Safety Rep. | HCF-fileserver\company\public\Safety\Forms\Hazass |
| Integrated Contingency Plan | Environmental Rep. Check-List | Every 5 years | Environmental Rep. | HCF-fileserver\company\public\Manuals\ICP |
| Internal Fuel Tank Inspection | Environmental Rep. Check-List | Every 10 years | Environmental Rep. | All Reports filed in Administrative File 11.1, and in the Safety & Environmental Office in cabinet B1 |
| Lab Hygiene | Environmental Rep. Check-List | Every 3 Years | Environmental Rep. or Safety Rep. | HCF-fileserver\company\public\Manual\Hygiene |
| Linearity | Environmental Rep. Check-List and I&C PM | Quarterly | Senior I&C Tech. | Filed with Quarterly Air Report. |
| NOx Annual Report | Environmental Rep. Check-List | Annually | Environmental Rep. | HCF-fileserver\company\public\Environmental\Air\NOx SIP & Trading\2004 Letters\NOx Annual Report |

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| Document Name | Monitoring Method | Monitoring Frequency | Primary Responsibility | Control Document file location |
|-------------------------------|--|-----------------------------|---|---|
| Piping Hydro | Environmental Rep. Check-List | Every 5 years | Environmental Rep. | All Reports filed in Administrative File 11.1, and in the Safety & Environmental Office in cabinet B1 |
| Plant O&M Manual | Safety Rep. Check-List | Every 5 years | Safety Rep. | HCF-fileserver\company\public\Manuals\O&M Manual |
| POTW | Environmental Rep. Check-List | Annually | Environmental Rep. | HCF-fileserver\company\public\Environmental\POTW |
| POTW Permit | Environmental Rep. Check-List | Every 5 years | Environmental Rep. | Forms filed in Safety and Environmental Office cabinet C2 |
| Quarterly Air Report | Environmental Rep. Check-List and I&C PM | Quarterly | Environmental Rep. | HCF-fileserver\company\public\Environmental\Air\Qtr\ (files). Main Administrative Files 14.2.0 |
| RATA | Environmental Rep. Check-List and I&C PM | Annually | Environmental Rep. and Senior I&C Tech. | All Reports filed in Administrative File 14.2.1, and in the Safety & Environmental Office in cabinet C1 |
| Safety Manual | Safety Rep. Check-List | Every 3 years review | Safety Rep. | HCF-fileserver\company\public\Manuals\Safety Manual |
| SARA Title III Tier II Report | Environmental Rep. Check-List | Annually | Environmental Rep. | HCF-fileserver\company\public\Environmental\SARA\Yrxx\ Tier II. |
| Semi-Annual Air Report | Environmental Rep. Check-List | Every 6 months | Environmental Rep. | HCF-fileserver\company\public\Environmental\Air\Semi-Annual Reports\ (6 months covered by the report. |

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|  | Revision Number: 01 | Approval: Charles Davis |
| | Title: Document Control Program | Author: Harry C. Barnes Jr. |

| Document Name | Monitoring Method | Monitoring Frequency | Primary Responsibility | Control Document file location |
|---------------------------------------|-------------------------------|--|--|---|
| Solid Waste Management Plan | Environmental Rep. Check-List | Every 3 years | Environmental Rep. | HCF-fileserver\company\public\Manuals\Sol-Mgt |
| Steam Analysis to Aqualon | Environmental Rep. Check-List | Monthly | Environmental Rep. | Filed in notebook under subject name in Safety and Environmental Office. HCF-fileserver\company\public\Chemistry\Steam Samples. |
| Storm Water Pollution Prevention Plan | Environmental Rep. Check-List | Every 3 years or as the permit specifics | Environmental Rep. | HCF-fileserver\company\public\Manuals\Storm Water |
| Storm Water Testing | Environmental Rep. Check-List | Quarterly | Environmental Rep. | HCF-fileserver\company\public\Chemistry\DMR\Storm Protocol |
| TRI Report | Environmental Rep. Check-List | Annually | Environmental Rep. | Computer program issued by EPA, copies filed in TRI notebook in the Safety and Environmental Office |
| Waste Water O&M Manual | Environmental Rep. Check-List | Every 3 years | Environmental Rep. | HCF-fileserver\company\public\Manuals\Waste Water |
| Water Certificate | Environmental Rep. Check-List | Annually | Environmental Rep. | HCF-fileserver\company\public\Environmental\Water\Annual Certificate |
| Water Permit | Environmental Rep. Check-List | Every 5 years | Environmental Rep. or Outside Contractor | HCF-fileserver\company\public\Environmental\Water\Water Permit. |

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|  | Revision Number: 01 | Approval: Charles Davis |
| | Title: Document Control Program | Author: Harry C. Barnes Jr. |

5.8 Hopewell Cogeneration Facility Document Control Program – Record-keeping

| Document Name | Is this Document a Legal Requirement? | Location of each Copy of the Document | Primary Responsibility | Control Document file location |
|------------------------------------|--|--|-------------------------------|---------------------------------------|
| Acute and Chronic Testing | Yes by Water Permit | Lab S&E (DMR Notebook) State DEQ | Environmental Rep. | Lab Results at the Lab |
| Air Certificate | Yes by Air Permit | Computer S&E File C1 Admin File 14.2.1 State DEQ Federal EPA | Environmental Rep. | Computer Document |
| Air Permit | Yes by Title V of the Clean Air Act | Computer S&E Air Permit Notebook S&E Permits and Manuals Notebook | Environmental Rep. | State |
| Annual Air Emission Report | Yes by State and Federal | Computer Admin File 14.2.0 State DEQ | Environmental Rep. | Computer |
| Annual Lab Test (Chlorine and TSS) | No | Computer Lab (on the waste water cabinet door inside the cabinet) | Environmental Rep. | Computer |
| CGA | Yes by Air Permit | I&C Tech File Admin File 14.0 State DEQ (With Quarterly Air Report) | Senior I&C Tech. | I&C Tech File |
| DCR | Yes by Air Permit | Computer S&E (in the DCR Notebook) Admin File 14.13 TPI (with the Monthly Report) | Environmental Rep. | Computer |
| DMR | Yes by Water Permit | Computer S&E (DMR Notebook) State DEQ | Environmental Rep. | DMR Notebook |
| EDR | Yes by Air Permit | CEM Computer S&E (DAS 2000 Notebook) EPA Computer | Senior I&C Tech | CEM Computer |
| Emergency Evacuation Plan | Yes under OSHA Regulations | Computer Emergency Binder (in Control Room) | Safety Rep. | Computer |

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| | | Revision Number: 01 | Approval: Charles Davis |
| | | Title: Document Control Program | Author: Harry C. Barnes Jr. |

| Document Name | Is this Document a Legal Requirement? | Location of each Copy of the Document | Primary Responsibility | Control Document file location |
|--------------------------------|--|--|-------------------------------|---------------------------------------|
| External Fuel Tank Inspection | Yes under ODCP | Contractor S&E (Files B1) Admin Files 11.1 State DEQ | Environmental Rep. | Inspecting Contractor |
| Fire Prevention Preplans | Yes under OSHA Regulations | Computer S&E (Notebook with Hazard Assessments) Emergency Binder (Control Room) | Safety Rep. | Computer |
| Fuel Tank Dike Wall Inspection | Yes under ODCP | Contractor S&E (Files B1) Admin Files 11.1 State DEQ | Environmental Rep. | Inspecting Contractor |
| Fuel Tank Registration | Yes under ODCP | Computer S&E (Files B2) Admin Files 11.1 State DEQ | Environmental Rep. | Computer |
| Ground Water Report | Yes under ODCP | Computer Lab (has test results) S&E (Ground Water Report Notebook) Admin Files 14.3.7 State DEQ | Environmental Rep. | Computer |
| Hazard Assessment | Yes under OSHA Regulations | Computer S&E (Notebook with Hazard Assessments) Emergency Binder (Control Room) | Safety Rep. | Computer |
| Integrated Contingency Plan | Yes under ODCP | Computer Contractor (PE) S&E (in ICP Notebook) Emergency Binder (in Control Room) Admin Files 14.3.7 TPI (Environmental) State DEQ Federal EPA City (LEPC) City (Fire Marshall) | Environmental Rep. | Computer |

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| Document Name | Is this Document a Legal Requirement? | Location of each Copy of the Document | Primary Responsibility | Control Document file location |
|-------------------------------|--|--|---|--|
| Internal Fuel Tank Inspection | Yes under ODCP | Contractor S&E (Files B1) Admin Files 11.1 State DEQ | Environmental Rep. | Inspecting Contractor |
| Lab Hygiene | Yes under OSHA | Computer S&E (Files C3) Lab | Environmental Rep. or Safety Rep. | Computer |
| Linearity | Yes 40 CFR 75 | I&C Tech File Admin File 14.2.0 State DEQ (With Quarterly Air Report) | Senior I&C Tech. | I&C Tech Files |
| NOx Annual Report | Yes 40 CFR 79 | Computer S&E (NOx Notebook) Admin File Federal EPA | Environmental Rep. | Computer |
| Piping Hydro | Yes under ODCP | Contractor S&E (Files B1) Admin Files 11.1 State DEQ | Environmental Rep. | Inspecting Contractor |
| Plant O&M Manual | No | Computer Blue Book (in Control Room) | Safety Rep. | Computer |
| POTW | No, requested by the City of Hopewell | Computer S&E (Files C3) City(Waste Water Treatment Center) | Environmental Rep. | Computer |
| POTW Permit | Yes, Required through the City by the Clean Water Act. | City Admin File 14.9 S&E (Files C3) | Environmental Rep. | Held by the City at the Waste Water Treatment Center |
| Quarterly Air Report | Yes, Required by the Air Permit | Computer Admin File 14.2 State DEQ | Environmental Rep. | Computer |
| RATA | Yes 40 CFR 60 and 75 | Contractor (test results) I&C Tech File S&E (Files C1) Admin File 14.2.0 State DEQ (With Quarterly Air Report) | Environmental Rep. and Senior I&C Tech. | Contractor |
| Safety Manual | Yes under OSHA Regulations | Computer Control Room S&E Office Each Employee TPI | Safety Rep. | Computer |

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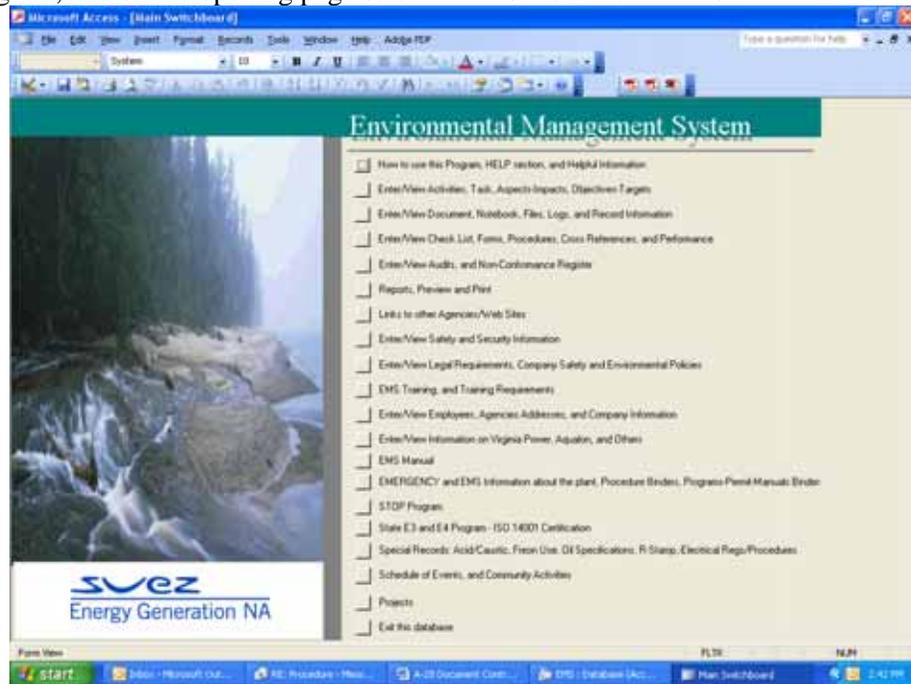
| Document Name | Is this Document a Legal Requirement? | Location of each Copy of the Document | Primary Responsibility | Control Document file location |
|---------------------------------------|---|---|---|---|
| SARA Title III Tear II Report | Yes | Computer S&E (SARA Notebook) State DEQ City (LEPC) City (Fire Marshall) | Environmental Rep. | Computer |
| Semi-Annual Air Report | Yes, Required by the Air Permit | Computer Admin File 14.2 State DEQ | Environmental Rep. | Computer |
| Solid Waste Management Plan | Yes Required by 40 CFR 239 to 299 | Computer S&E (Waste Management Notebook) Admin Files 14.4 | Environmental Rep. | Computer |
| Steam Analysis to Aqualon | No | Water Treatment (Lab computer) Water Treatment Rep. S&E (Aqualon Steam Analysis Notebook) HCF Computer Aqualon | Environmental Rep. and Water Treatment Rep. | Water Treatment Rep. Lab Computer |
| Storm Water Pollution Prevention Plan | Yes, required by the Water Permit | Computer Contractor (PE) Admin Files 14.3.8 S&E (DMR Notebook)((Kept on site)) | Environmental Rep. | Computer |
| Storm Water Testing | Yes, required by the Water Permit | Contract Test Lab S&E (DMR Notebook) | Environmental Rep. | Contract Test Lab Rep. |
| TRI Report | Yes, required under the community right to know law | Computer S&E (SARA Notebook) State DEQ City (LEPC) City (Fire Marshall) | Environmental Rep. | Computer (Special program from the EPA) |
| Waste Water O&M Manual | Yes, required by the Water Permit | Computer S&E (DMR Notebook)((Kept on site)) | Environmental Rep. | Computer |

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| Document Name | Is this Document a Legal Requirement? | Location of each Copy of the Document | Primary Responsibility | Control Document file location |
|----------------------|--|---|-------------------------------|---------------------------------------|
| Water Certificate | Yes, required by the Water Permit | Computer Admin Files 14.3 S&E (DMR Notebook)((Kept on site)) | Environmental Rep. | Computer |
| Water Permit | Yes, required by the Water Permit | State Computer Contractor Lab S&E (Notebook Water Permit Working Copy) S&E (Files C2) TPI (Environmental) | Environmental Rep. | State Permit Writer |

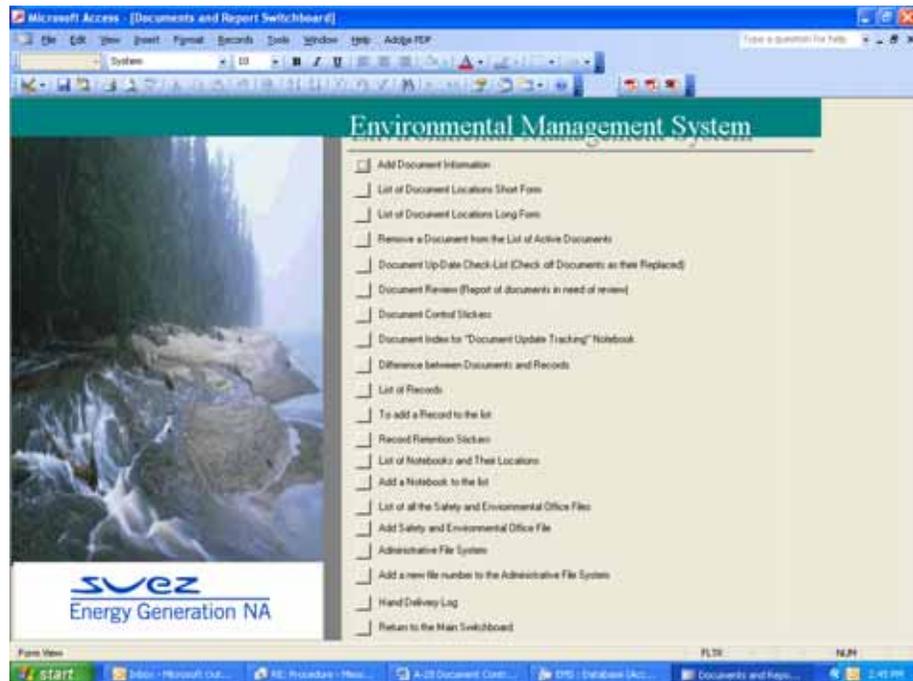
6.0 **Control Previsions**

6.1 The EMS Database Program has a section for the control of Documents. Go to the program, and on the opening page select “Enter/View Documents”.

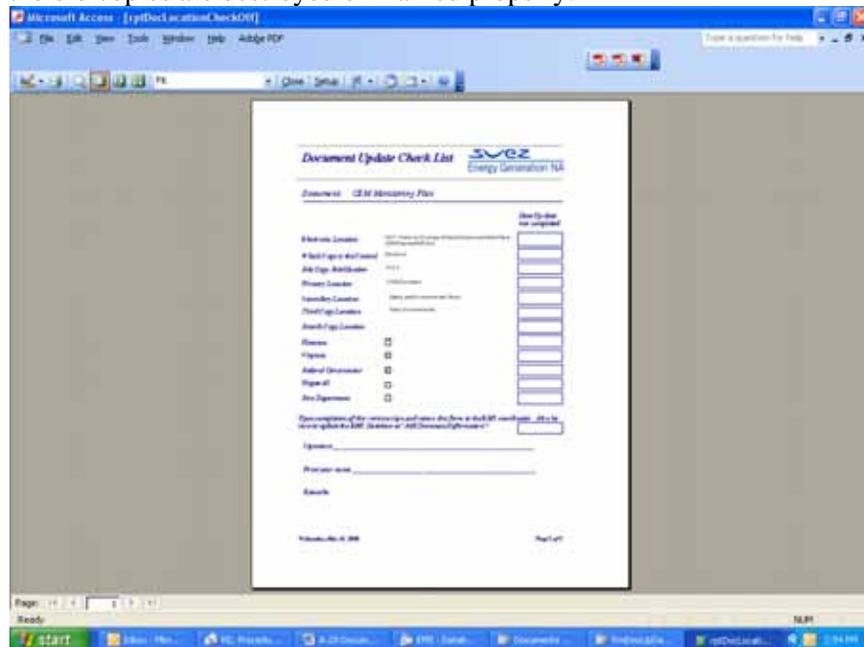


6.1.1

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- 6.1.2
- 6.1.3 Once in the document section one can see the various controls.
- 6.1.4 Add Document Information, will allow the updating of data/information on any document.
- 6.1.5 Both short and long form document printouts can be obtained.
- 6.1.6 If a Document is no longer required, it can be taken out of the system by using the “Remove a Document from the active list”
- 6.1.7 When a Document is reviewed/revised then a check sheet is needed to make sure that all locations where that document resides are updated and the old copies are destroyed or marked properly.



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6.1.8 Once the document has been revised the check sheet is placed in the “Document Update Tracking “notebook. All written copies are to contain a control sticker that tells the date of the revision, and the copy number of the document in hand, as well as how many copies of the document there are. If an old copy is to be retained, it is to be marked with a control sticker that indicates this is a reference copy. Also there are retention stickers for documents and records that needs to be retained for a prescribed time.

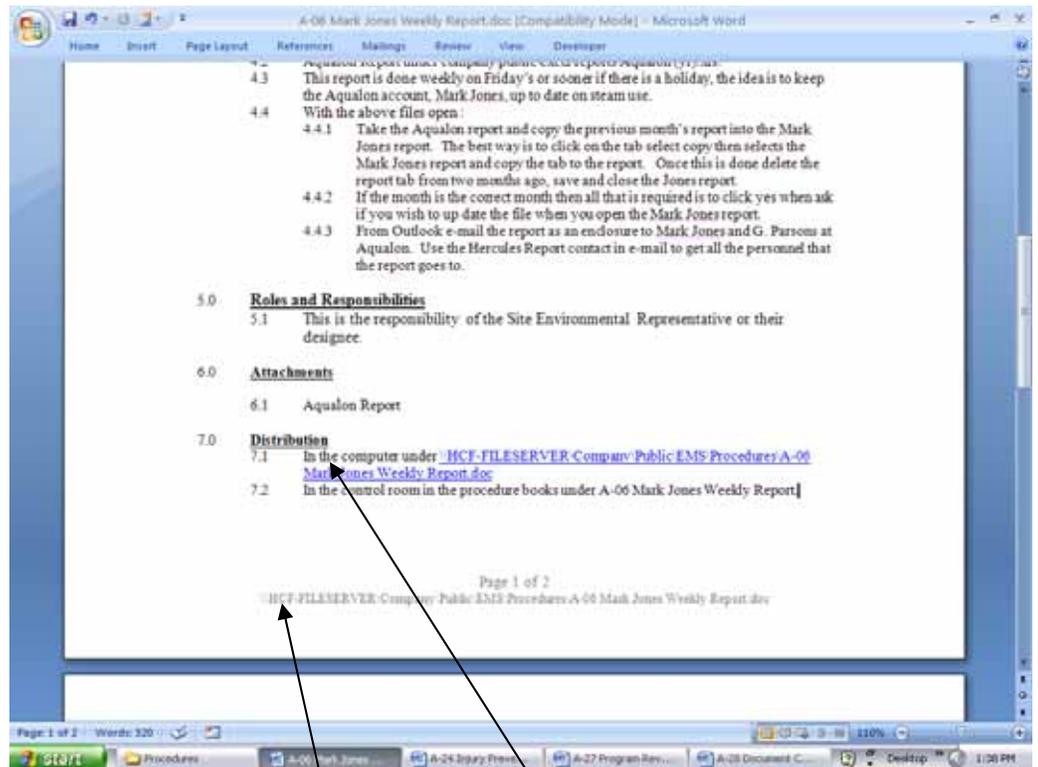


6.1.9 A new document would have to be entered into “Add Document Information” and the section under activity must be filled in or the document will not show up in the check list. Any Document has to be updated and had to be added to Check-list C-06, this is the master check list that is used as a monthly check off for short and long range items for Safety, Environmental, Electrical Power items, and Fuels. In addition this Procedure is to be updated to include the new document.

6.1.10 As documents are removed or procedures within the documents are changed the document can be removed using the EMS Database Program. However, this procedure must also be reviewed to remove any references to the document or any procedures referenced. This all can be done, and should be done as one complete step, following the program revision procedure.

6.1.11

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On documents, procedures, etc. it is a very good idea to put a distribution list to be sure that all copies are accounted for. The second thing is to put the location of the item. If the file is needed to be in more than one place in the computer make one the master and use short cuts for all other places that the file is used. In this way the master will always be updated.

7.0 Program Revisions

7.1 Revision Procedure; Use Procedure A-27

To enable us to keep this manual accurate and up to date, corrections and updates will be an ongoing process. Therefore any individual finding an error or wishes to enter an update is required to fill out the Revision Form found at;

<\\Hcf-fileserver\company\Plant Operational Forms\Procedural Change Form.doc>

8.0 Roles and Responsibilities

8.1 This is the responsibility of the Site Environmental Representative or their designee.

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9.0 Attachments

- 9.1 List of Documents
- 9.2 List of Cross-references
- 9.3 Revision Sheet
- 9.4 Photocopy of Control Stickers

10.0 Distribution:

- 10.1** In the computer under Z:\Public \EMS \Procedures \A-28 Document Control Program.doc
- 10.2** EMS Manual in the Control Room Tab 15
- 10.3** In the Control Room in the procedures manual under A-28 Document Control Program.

11.0 Revision/Review History

| <u>Revision/Review</u> | <u>Editor</u> | <u>Edit Date</u> |
|------------------------|----------------|------------------|
| R-01 | Chuck Barnes | 7/10/06 |
| Review | Chuck Barnes | 10/6/06 |
| Review | Chuck Barnes | 4/2/07 |
| Review | Chuck Barnes | 3/14/08 |
| Review | Taylor Dunford | 8/15/08 |
| Review | Chuck Barnes | 7/16/09 |
| Review | Chuck Barnes | 8/30/2010 |

As of 2010 Procedure and Checklist Reviews will be conducted every other year; the even numbered procedures/checklist on the even years and the others on the odd years. Updates and Revisions should be done soon after the change has been made.