ENVIRONMENTAL PRE-AUDIT QUESTIONNAIRE

PART I: GENERAL BACKGROUND INFORMATION

Facility Name and Address: Hopewell Cogenration Facility
1114 Hercules Road
Hopewell, Virginia 23860
Phone: (804) 458-0700
Fax: (804) 458-0794

1. Name(s) of staff with Environmental, Health and Safety (EH&S) responsibilities:

Environmental: Chuck Barnes
(804) 458-0700 x 203
chuck.barnes@gdfsuezna.com

Safety: Enrique Toro
(804) 458-0700 x 208
enrique.toro@gdfsuezna.com

2. Site and Facility Characteristics:
(a) Approximate Site acreage: 6 Acers

(b) Please identify all buildings, fuel storage and handling areas, etc. occupied by your company, including approximate square footage and what each building is used for:

Building Name	**Dimensions in Feet**	**Number of Floors**	**Approx. Square Footage/Capacity**
Administration Building	70 X 75	2	10,500 sqft
Battery Room	18 X 26	1	468 sqft
Steam Turbine Building	70 X 136	3	28,560 sqft
Gas Turbine Building	86 X 192	1	16,512 sqft
Cooling Tower Pump House	36 X 36	1	1, 296 sqft
Deminralizer Building	46 X 104	1	4,184 sqft
SPSG Building	40 X 66	1	2,640 sqft
Deminralizer Ext. Building	16 X 36	1	576 sqft
Diesel Building	18 X 28	1	504 sqft
Maintenance Shop	42 X 86	1.5	5,418 sqft
Gas Compressor Building	26 X 28	1.25	910 sqft
Guard House	12 X 18	1	216 sqft
Fuel Transfer Building	20 X 32	1	640 sqft
Fuel Tanks	49 X 67	3 Tanks	1,250,000 Gal. Each
Neutralization Tank	28 X 28	1 Tank	110, 000 Gal.
Demin. Water Storage Tank	48 X56	1 Tank	800,000 Gal.
Incoming Water Storage	35 X 46	1 Tank	375,000 Gal.

(c) Is Facility leased or owned by your company? ___ Leased _X_ Owned

(d) How many years has your company occupied this Facility? Construction started in 1988, the plant went commercial in August of 1990.

(e) Number of employees: 18

3. Please identify the source (supplier) of the following utilities (if utility not used, state N/A):

(a) Potable Water: Virginia American Water Company

(b) Process/Cooling Water: Virginia American Water Company (use City water for cooling)

(c) Sanitary Sewerage: Hopewell Regional Wastewater Treatment Center

(d) Process Sewerage: Hopewell Cogenration Facility VA00079506 Permit

(e) Electricity: Virginia Power

(f) Process Heat/Steam: N/A supplied by ourselves

(g) Space Heating and Cooling: Trane Heating and Cooling units (3) roof mounted.

5. Please briefly describe the facility's operations (if available, simply append a prepared operations summary):

The Hopewell Cogeneration Facility, a 356.5 MW combined cycle cogeneration facility, is an independent power producer. The Facility has three ABB type 11 N combustion turbines, each rated at 1,143.6 million-BTU/hour on natural gas and 1,091.1 million-BTU/hour on number 2 fuel oil, and three unfired Nooter Eriksen heat recovery steam generators (HRSGs), each rated at 360,000 pounds/hour. The Facility has one ABB 120,000 kilowatts steam turbine, and two auxiliary Babcock and Wilcox boilers; each rated at 229.0-million BTU/hour on natural gas and 220.0 million-BTU/hour on number 2 fuel oil. The Facility has two Caterpillar 1,500 KW diesel generators and three 1.250 million gallon number 2 fuel oil tanks.

The Hopewell Cogeneration Facility, which is located in an attainment area, is a federal major stationary source because the Facility's emissions exceed 100 tons per year and the Facility is one of the 28 stationary sources categories identified in 40 CFR 52, Section 52.21 or because total annual emissions exceed 250 tons per year. The Facility is a PSD major source and received a PSD permit issued on July 1, 1988 and amended on

March 31, 1989 and October 31, 2000. A permit for a third number 2 fuel oil storage vessel was issued on June 6, 1990.

The Facility is a Title V major source of PM10, SO2, NOx and CO. pollutants.

In compliance with the provisions of the Clean Water Act as amended and pursuant to the State Water Control Law and regulations adopted pursuant thereto, the following owner, Hopewell Cogenration Facility, is authorized to discharge in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in VPDES permit number VA0079502.

The owner is authorized to discharge to the following receiving streams: Gravelly Run, and final discharge to James River.

6. Please identify in the table below the primary chemicals and fuels used at the Facility, including estimates of the annual quantities consumed for each material:

Chemical/Fuel Name	Annual Volume
Sodium Hydroxide (Caustic)	1,306 Tons per year
Sulfuric Acid	1,040 Tons per year
#2 Fuel Oil	3.1 Million gallons per year
Natural Gas	3.7 Million SCF

PART II: SITE HISTORY AND DESCRIPTION OF SURROUNDING LAND USES

1. Please describe the known history of your Facility and site, including when the site was developed for its current use and known past uses of the property and Facility: Hopewell Cogenration Facility was located on a site that was previously used by Aqualon Chemical Plant, a division of Hercules, HCF's Steam Host, this was a chlorine plant of Aqualons'. The site was cleared in 1987, and construction for HCF started in 1989 and was commissioned in 1990.

2. Please describe significant changes that have occurred in Facility operations: None.

3. Have any of the features or conditions noted below been present at the Facility/Site in the past?

(i) Septic system Yes __ No _X_

(ii) Disposal of any type of waste Yes _X_ No _

(iii) Pits or sumps of any type Yes _X_ No __

(iv) Floor drains Yes _X_ No __

(v) Manufactured Gas Plant (MGP) Yes __ No _X_

If you have marked "YES" to any of the above, please describe each situation below:

1. The plant has Universal waste, and as an exempt small quantity generator there is some Hazardous and Non- Hazardous waste. There is the normal Dumpster waste and used oil.
2. The plant has a number of sumps; these are dike like areas that are used as containment for Chemicals/Oil. There are a number of electrical pits, and cable vaults.
3. The plant has floor drains to keep Chemicals/Oil from leaking out of buildings on to the ground. All of these drains go through an oil – water separator and a holding sump that is alarmed.

4. Please describe the current use of properties abutting or adjacent to your site:

- The North, West, and South sides of the plant are bounded by railroad tracks.
- On the West and South sides there are woods, with the Virginia Power Switchyard taking up about ¾ of the south boundary on the east.
- The North side has construction lot.
- To the east is Hercules road and the Hercules chemical plant is across the road to the east.

PART III: KNOWN OR SUSPECTED SPILLS/RELEASES

1. Has there ever been a release, spill, or leak of a hazardous substance or petroleum hydrocarbons at the site or has the Facility/site ever been investigated by a governmental agency for the actual or potential presence of an on-site contamination problem? Yes _X__ No ___

(a) If “YES”, please describe the circumstances surrounding the incident (date, source, and location), including any notification submitted or received from any governmental agency, the agency's response and the current status of the matter:

In 2005 there was a leak in the fuel oil unloading building. Less than 10 gallons breached the door sill and went into the soil in and around vapor well #8. The ground has been removed and replaced. The vapor well has been dug out and replaced.

In 1994 a flange gasket blew out and sprayed fuel oil out of GT3. The fuel went through the wall paneling and on to the ground. Site personnel and an environmental contractor cleaned it up. Vapor wells are present in the area of the spill and are monitored monthly.

(b) If you marked "NO", is there any reason to believe that such a contamination problem may be present on or beneath the site? Yes ___ No ___

If "YES," please briefly describe the circumstances or conditions that lead you to believe that a contamination problem might be present:

2. Has any environmental sampling of site soil or groundwater ever taken place?
Yes __X_ No ___

If "YES", please provide information concerning the reason for the sampling, period when sampling took place, sampling results, and whether sampling information was submitted to any governmental agency.
Annually water well samples are taken ad the results sent to DEQ.

PART IV: SELECTED REGULATORY ISSUES

1. Solid and Hazardous Waste
(a) Please identify the principal wastes generated by your facility; including estimated annual quantities by waste type:

Hazardous or Special Wastes		Non-Hazardous Wastes	
Waste Type	Annual Volume	Waste Type	Annual Volume
Paint Solvents	Average 10 lbs per year, the last shipment was in 2000	Oil dry and rags	Average one 55 gallon drum per quarter
Firquel Flushing	Average < 10 lbs per year the last shipment was 2002	Parts Washer solvent	25 gallons per month
Universal Waste Batteries Light bulbs	 20 lbs per month 30 light bulbs per month	Normal Dumpster waste	About 200 lbs per week. More during outages
		Metals	Average 500 lbs per month recycled

(b) What is done with your Facility's hazardous or special wastes generated relative to disposal?
___ On-site recycling/disposal
__X_ Off-site recycling/disposal

If off-site disposal, please identify below disposal locations by waste type and

approximate years during which disposal location (s) used.
All Hazardous waste has been through an environmental contractor each has gone to a different site. See Hazardous Waste Binder.

Waste Type Disposal Facility	(Name, City, State)	Estimated Period of Usage

(c) Has the Facility ever been investigated by any governmental agency relative to any off-site waste disposal facility or other disposal location used?
Yes ___ No _X__
If "Yes", when, by whom, why, and what were the results?

(d) Have there been any governmental inspections or investigations concerning the facility's waste management practices during the past five years? Yes _X__ No ___

If "Yes", when, by whom, why, and what were the results? Virginia DEQ on March 8, 2004, normal inspection. No problems were found.

(e) Have there ever been any notices of violation or enforcement actions taken by any governmental agency against the Facility relative to its waste management practices? Yes ___ No _X__

If "Yes", when, by whom, why, penalty involved, and was compliance achieved to the satisfaction of the agency?

2. Above and Underground Storage Tanks
(a) Are there any active or inactive above or underground storage tanks present on the subject site?

Above Ground
Yes _X__ No ___

Underground
Yes ___ No _X__

If "Yes", please describe all above and underground storage tanks, including contents, capacity, year installed, and whether any tank tightness test has taken place:

Tank Name	Capacity	Year Installed	Tightness Test
Fuel Oil Tank #1	1.25 Million Gal.	1989	2008
Fuel Oil Tank #2	1.25 Million Gal.	1989	2008
Fuel Oil Tank #3	1.25 Million Gal.	1990	2008
Demin. Water Tank	800,000 gallons	1989	2005
Raw Water Tank	375,000 gallons	1989	2005

Neutralization Tank	110,000 gallons	1989	2005
Diesel Fuel Tank #4	15, 000 gallons	1989	Visual test 2008

(b) Are there any known underground tanks that have been abandoned in-place or removed from the ground? Yes ___ No __X_
If "Yes", please describe each tank, including size, contents, and year abandoned/removed, reason for abandonment/removal, and post-removal soil testing results:

3. Wastewater and Stormwater Discharges
(a) Please identify and describe stormwater and wastewater streams from the Facility, including effluent type (sanitary, process, storm), estimated volumes, discharge point (receiving stream, sewage system, septic field, etc), and permit identification.

Permit ID

Wastewater Stream and Stormwater	Estimated Volume (gallons per day)	Discharge Point	Permit ID
Outfall 002 Stormwater	Dependent on annual rainfall	Gravely Run to the James River	VA0079502
Outfall 001	Average 1.2 MGD	Gravely Run to the James River	VA0079502
Sanitary	142 Gallons per Day	Hopewell Regional Wastewater Treatment Center	H-14

(b) Have there been any governmental wastewater-related inspections or investigations during the past five years? Yes _X__ No ___

If "Yes", when, by whom, why, and what were the results?
DEQ inspects the plant every 2 years; the last inspection was in 2002. The plant's water permit is being renewed in 2004. The state will inspect all records and operations during the permit renewal process.

(c) Have there ever been any wastewater-related notices of violations or enforcement actions taken by a governmental agency against the Facility? Yes ___ No _X__

If "Yes", when, by whom, why, penalty involved, and was compliance achieved to satisfaction of agency?

4. Air Quality
(a) Please identify and describe significant point air emission sources, including the discharge points, control technologies in place and permit identification:

Emission Source	Discharge Point	Control Equipment	Permit ID
GT1	GT Stack	Steam Injection	PRO50967
GT2	GT Stack	Steam Injection	PRO50967
GT3	GT Stack	Steam Injection	PRO50967
SPSG1	SPSG Stack	Flue gas recirc.	PRO50967
SPSG2	SPSG Stack	Flue gas recirc.	PRO50967
Diesels	Diesel Stacks	None	PRO50967
Fuel Tanks (3)	Vents	None	PRO50967

(b) Have there been any governmental air quality-related inspections or investigations of the Facility during the past five years? Yes _X__ No ___

If "Yes", when, by whom, and what were the results?
Every year State DEQ holds an air inspection on site. EPA conducted an inspection of the facility from August of 2002 until January of 2004. Out of both inspections one report was found to be late.

(c) Have there ever been any air quality-related notices of violation or enforcement actions taken by a governmental agency against the Facility? Yes ___ No _X__

If "Yes", when, by whom, why, penalty involved, and was compliance achieved to satisfaction of agency?

(d) Has a Title V Operating Permit been issued to your Facility? Please provide a copy of the Permit, or if not yet issued, the application.

(e) Please describe the continuous emission monitoring requirements at your facility. Which Units are subject to:

- NOx Budget or SIP Call ozone season NOx cap and trade program—YES
- SO2 Acid Rain cap and trade program—NO
- NOx RACT—
- SARA reporting—YES

5. Other Regulatory or Related Matters

(a) Has an asbestos, lead paint, or PCB survey ever been conducted at the Facility?
Yes ___ No _X__

If "Yes", please summarize key findings and describe reason for survey:

(b) Has there ever been a prior environmental audit, investigation or due diligence evaluation performed at the subject site or Facility? Yes __X__ No ___

If "Yes", please summarize key findings and describe reason for study:

Audit conducted on NOx SIP, and all the reports and regulations that deal with Part 75.

(c) Are there any active, pending, or potential legal suits against the Facility for alleged environmental problems by past or present employees, neighbors, or other parties and not previously discussed? Yes ___ No _X__

If "Yes", please describe:

(d) Are you aware of any existing, expected or proposed environmental regulations? that will affect your Facility and necessitate an expenditure of $10,000 (U.S. dollars) or more during the next five years in order achieve compliance? Yes ___ No _X__

If "Yes", please describe:

Please attach (if available).
To minimize business interruption while on-site, please prepare to have as many of these documents/ programs available in the meeting room so that auditors can review expediently. We understand that some of these documents/ programs may not apply to your facility. Please indicate those programs that you currently have.

EH&S Documents / Programs	Yes	No	N/A or Comments
Prior Phase I and II Environmental Site Assessment Reports or other similar reports			N/A no copy on site, there may be a copy in Houston
Hazardous Waste Management handling/emergency/spills) training records with dates	YES		Training Data Base Program
Hazardous Waste Disposal Documentation for past three years	YES		Data base program and a Waste Binder
Spill Prevention Control and Countermeasures (SPCC) Plan	YES		In ICP
PCB Inventory/Annual Report			N/A
RCRA Contingency Plan			N/A
SARA Reports (Tier I/II, Form R) for past three years	Yes		Tier II and Form R
Spill/Release Reports	Yes		TRI reports
Wastewater and Stormwater Discharge Permits			Water Permit
Wastewater and Stormwater Discharge	Yes		DMR's

Monitoring Results for past two years			
Drinking Water Permit (if facility uses own wells)			N/A
Underground Storage Tank Leak Testing Documentation			N/A
Underground Storage Tank Removal / Closure Documents			N/A
Underground Storage Tank Registrations			N/A
Air Permit (may require Generator Operating Log)	Yes		Rolling Average Reports