

## EMISSIONS - STACK MONITORING & REPORTING

- Construction:
  - No expected Notice of Air Construction Quality (no anticipated new source per below).
- Operations:
  - No monitoring or reporting requires as there are no measurable emissions other than as covered by Radioactive Air Emissions License (see below) [Zero-carbon technology].
  - Continuous monitoring/annual reporting and certification, which includes:
    - Measurement of effluent concentration;
    - Total activity in the release stacks;
    - Dose levels to potential to emit (PTE) maximum; and
    - Note: As applicable, would cover steam emissions associated with machine cooling
- Our facility will be designed pursuant to the Department of Health “Best available radionuclide control technology” (BARCT) compliance demonstration requirements for new sources. Thereafter, we will engage in annual reporting/compliance measures to ensure we are using “As low as reasonably achievable control technology” (ALARACT) for existing sources.
- Note that our non-stack (facility) “air quality” will be monitored pursuant to our Radioactive Materials License (see below).

## WATER DISCHARGE & STORMWATER MONITORING & REPORTING

### Construction Stormwater General Permit:

- To ensure compliance with our construction stormwater pollution prevention plan, we will engage in continuous monitoring, training, maintenance, and annual/event-based reporting and will rely on third-party and internal review of surface/storm drain water sampling from multiple source points for any contaminants.

### Industrial Stormwater General Permit (operating):

- To ensure compliance with our stormwater pollution prevention plan (SWPP), we will engage in continuous monitoring, training, maintenance, and annual/event based-reporting and we will rely on third-party and internal review of surface/storm drain water sampling from multiple source points for any contaminants.

### Additional:

- Helion also intends to monitor site conditions inside and outside of the generating facility for radioactive material, including relating to soil quality and groundwater. This is in addition to the requirements under our proposed SWPP and may or may not be part of our anticipated RAEL and RML.

## MATERIALS MONITORING & REPORTING

### Radioactive Materials License (RML):

- To facilitate compliance with our Radioactive Materials License (RML), we will engage in *continuous monitoring, and comply with annual reporting/inspection* requirements, including with respect to:
  - surveying/monitoring work areas for any physical/airborne exposure to radioactive

materials

- physical inventories of materials
- component opening
- dosimeter readings to ensure safe procedures
- contamination surveys
- leak tests to ensure safe materials handling and storage
- transportation requirements
- security
- waste disposal procedures
- instrument calibrations
- material receipt and storage, use, and inventory
- monitor relevant “hoods” to ensure that flow meets RML specifications

X-Ray Registrations:

- To facilitate compliance with our X-Ray registrations we will monitor and the DOH will perform annual inspection of our of shielding and component materials.

**WASTE MONITORING & REPORTING**

Dangerous waste annual report (and fees, as applicable):

- We will provide annual reporting of dangerous waste activities at site, generally to be handled via a hazardous waste service provider contractor.

Low-level Radioactive Waste Site Use Permit:

- We will permit our waste site use, as applicable (note: we expect the majority of our waste to be “byproduct” material under recent NRC guidance that may be disposed of at RCRA facilities).

**SERVICE WATER INPUT MONITORING & REPORTING**

New Water Right:

- We will facilitate Chelan PUD compliance with its **existing** water rights by conducting and annually reporting flow meter readings from our proposed wells.

Non-Transient Non-Community Permit & Public Water System Permits:

- We will perform ongoing sampling and monitoring regarding key health factors (i.e., coliform bacteria and nitrates) for our community/public water systems (note: this is unrelated to machine cooling steam output, as applicable).