



**Notification of Closure per 40 CFR §257.102(h)
Virginia Electric and Power Company
Bremo Power Station – West Ash Pond
Bremo Bluff, Virginia**

The United States Environmental Protection Agency's (EPA's) "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" (CCR Rule, 40 CFR 257 Subpart D) requires the owner or operator of a Coal Combustion Residuals (CCR) unit to prepare a notification of closure within 30 days of completion of closure of the CCR unit.

This Notification of Closure has been prepared pursuant to 40 CFR §257.102(h) of the CCR Rule and is intended to document the completed closure of the Bremo Power Station's West Ash Pond as of November 3, 2023.

Certification of closure completion pursuant to 40 CFR §257.102(f) of the CCR Rule is included herein.



Closure Completion Certification per 40 CFR §257.102(f)
Virginia Electric and Power Company
Bremo Power Station – West Ash Pond
Bremo Bluff, Virginia

The United States Environmental Protection Agency's (EPA's) "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" (CCR Rule, 40 CFR 257 Subpart D) requires the owner or operator of a Coal Combustion Residuals (CCR) unit to obtain a certification from a qualified professional engineer that closure of the CCR unit has been completed in accordance with the CCR unit's closure plan and the requirements of 40 CFR §257.102.

The Surface Impoundment Closure Plan for the Bremo Power Station West Ash Pond (WAP), last amended November 13, 2023, provides for the closure of the WAP by removal of the CCR material. Closure is considered complete under 40 CFR §257.102(c) of the CCR Rule when:

1. A Professional Engineer licensed in the Commonwealth of Virginia certifies CCR removal and decontamination, i.e., constituent concentration removal, throughout the CCR unit and any areas affected by releases from the CCR unit; and,
2. Groundwater monitoring concentrations do not exceed the groundwater protection standards established pursuant to 40 CFR §257.95(h) for constituents listed in Appendix IV of the CCR Rule.

Consistent with §257.102(c) of the CCR Rule, Golder Associates Inc. (Golder, now WSP) certified CCR removal and decontamination, i.e., constituent concentration removal, throughout the CCR unit and any areas affected by releases from the CCR unit, where no residual CCR materials remained visible.

Additionally, consistent with §257.95(h)(2) of the CCR Rule, Golder/WSP has evaluated quantified detections for the Assessment Monitoring Program (AMP) constituents, i.e., CCR Rule Appendix IV constituents, against the established federal CCR Groundwater Protection Standards (GWPS) using a value-to-standard comparison. Based on these evaluations, and pursuant to the CCR Rule, there were no federal CCR GWPS exceedances identified for at least two consecutive semi-annual groundwater monitoring events.

Based on review of the March 2020 *Closure by Removal Construction Report – West Ash Pond* prepared by Golder and the last two consecutive groundwater monitoring events reported by Golder/WSP, it is the opinion of Schnabel that the WAP has been closed in accordance with 40 CFR 257.102(c).



Therefore, I hereby certify that closure of the West Ash Pond at the Bremo Station has been completed in accordance with the Closure Plan, dated November 13, 2023, and the requirements of 40 CFR §257.102(c).

As used herein, the use of the word "certification" and/or "certify" shall be interpreted and construed as a Statement of Professional Opinion to the best of the Engineer's information, knowledge, and belief, and is not and shall not be interpreted or construed as a legal opinion, guarantee, or warranty by the Engineer.

James R. DiFrancesco, P.E.
Principal / Practice Leader Solid Waste