

CCR Rule Semi-Annual Remedy Selection Progress Report

Bremo Power Station – North Ash Pond Bremo Bluff, Virginia April 28, 2020

Title 40 Code of Federal Regulations (CFR) Section 257.97(a) of the Coal Combustion Residuals (CCR) Rule requires the owner or operator of an existing CCR unit that has completed a corrective measures assessment for groundwater to prepare a semi-annual report describing the progress in selecting and designing the remedy. This report constitutes the second semi-annual remedy selection progress report for the Bremo Power Station North Ash Pond located in Bremo Bluff, Virginia.

Assessment of corrective measures were initiated for the North Ash Pond on December 5, 2018 in response to groundwater protection standard exceedances for lithium in samples collected from two downgradient groundwater monitoring wells. Pursuant to 40 CFR §257.96(a), a demonstration of need for a 60-day extension for the assessment of corrective measures was completed on March 4, 2019, and the Assessment of Corrective Measures (ACM) Report and associated ACM Field Investigation Report were completed and placed in the unit's operating record on May 4, 2019. Based on the results of the corrective measures assessment, Dominion Energy must, as soon as feasible, select a remedy that meets the standards listed in 40 CFR §257.97(b). A summary of the progress selecting a remedy is provided in the selections below.

Summary of Actions Completed to Date

The following interim measures and actions have been completed to date:

- Deployment of a geosynthetic rain cover and Wind Defender cover over the entire footprint of the North Ash Pond to eliminate fugitive dust, significantly reduce precipitation from infiltrating through the unit, and to prevent the generation of contact stormwater;
- The Virginia Department of Environmental Quality (DEQ) issued Solid Waste Facility Permit No. 618 which includes requirements for groundwater and surface water monitoring for the North Ash Pond. The solid waste permit requires additional monitoring requirements beyond the requirements of the CCR Rule that include monitoring of additional constituents in groundwater, additional monitoring wells, and the monitoring of surface water (James River) downgradient of the unit. The additional monitoring requirements will further refine the nature and extent of groundwater impacts;
- In March 2020, the DEQ approved Groundwater Protection Standards (GPS) for CCR Rule Appendix IV and additional constituents at the North Ash Pond under the solid waste permit;
- In support of the closure by removal requirement set forth in Virginia Senate Bill 1355, Dominion Energy has retained engineering firm AECOM as the Engineer of Record to develop and execute plans for the removal of CCR material from the Bremo North Ash Pond.

- Installed permanent pumps and associated piping for the management of deep well pore water and transfer to West Ash Pond for interim storage during North Ash Pond closure. Pumps were commissioned and in service on March 17, 2020.

Planned Activities

The following activities are planned:

- In coordination with owner's engineer, develop a detailed scope of work for the removal of the CCR materials including a water management plan during the ash removal;
- Owners engineer to perform geotechnical evaluation of the North Ash Pond to determine extent and characteristics of CCR material to aid in removal sequencing;
- Semi-annual groundwater monitoring data will be compared to GPS recently approved by DEQ. The requirement for GPS comparisons for additional constituents beyond what is required in the CCR Rule may require an amendment to the ACM; and
- The next semi-annual progress report will be completed no later than October 25, 2020.