

LINER DOCUMENTATION

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Bremo Power Station CCR Surface Impoundment:West Ash Pond



Submitted To: Bremo Power Station

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1.0 CERTIFICATION

This Liner Documentation for the Bremo Power Station's West Ash Pond was prepared by Golder Associates Inc. (Golder). The document and Certification/Statement of Professional Opinion are based on and limited to information that Golder has relied on from Dominion Energy and others, but not independently verified, as well as work products produced by Golder.

On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the Commonwealth of Virginia that this document has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances, at the same time, and in the same locale. It is my professional opinion that the document is accurate and prepared consistent with the requirements in §257.71 of the United States Environmental Protection Agency's (EPA's) "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" published in the Federal Register on April 17, 2015 with an effective date of October 19, 2015 (40 CFR §257.71), as well as with the requirements in §257.100 resulting from the EPA's "Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Extension of Compliance Deadlines for Certain Inactive Surface Impoundments; Response to Partial Vacatur" published in the Federal Register on August 5, 2016 with an effective date of October 4, 2016 (40 CFR §257.100).

The use of the word "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion, and is not and shall not be interpreted or construed as a guarantee, warranty, or legal opinion.

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2.0 INTRODUCTION

This Liner Documentation was prepared for the Bremo Power Station's (Station) inactive Coal Combustion Residuals (CCR) surface impoundment, the West Ash Pond (WAP). This Liner Documentation was prepared in accordance with 40 CFR Part §257, Subpart D and is consistent with the requirements of 40 CFR §257.71 and 40 CFR §257.100(e)(3)(i).

The Station, owned and operated by Virginia Electric and Power Company d/b/a Dominion Energy Virginia (Dominion), is located in Fluvanna County at 1038 Bremo Road, east of Route 15 (James Madison Highway) and north of the James River. The Station includes an inactive CCR surface impoundment, the WAP, as defined by the Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule and Direct Final Rule (40 CFR §257; the CCR rule).

3.0 PURPOSE

Pursuant to 40 CFR §257.71(b) and §257.100(e)(3)(i), a professional engineer certification is required for *Liner Design Criteria for Existing Coal Combustion Residuals (CCR) Surface Impoundments*, regarding the liner design of the WAP at the Bremo Power Station.

4.0 CONCLUSIONS

It is Golder's opinion, based upon a review of available information, that the WAP is considered to be an inactive unlined CCR surface impoundment as that term is defined in 40 CFR §257.71(a)(3)(i). Specifically, the WAP is not constructed with a liner that meets the requirements of 40 CFR §257.71(a)(1)(i), (ii), or (iii).



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