



## Extension of Closure Timeframe for CCR Surface Impoundments

**Date:** December 14, 2021

**Station:** Bremono Power Station

**Unit:** East Ash Pond

Pursuant to 40 C.F.R. § 257.102(f)(2), Virginia Electric and Power Company d/b/a Dominion Energy Virginia (Dominion) is providing this demonstration to extend the time necessary to close the East Ash Pond at the Bremono Power Station in Bremono, Virginia. In March 2019, CCR material removal from the East Pond was completed, followed by over-excavation of the subsurface by a minimum of 6 inches in conformance with the unit's closure plan and Solid Waste Permit (SWP) 618. The Virginia Department of Environmental Quality (DEQ) provided verification of these activities in a letter dated October 1, 2019 (attached).

Closure is not considered complete, however, under 40 C.F.R. § 257.102(c), the unit's closure plan, and SWP 618 due to current groundwater monitoring concentrations exceeding established unit-specific groundwater protection standards. The East Pond is presently working through the Corrective Action process required by the CCR Rule, the unit's closure plan, and SWP 618.

As a practical matter, the unit accomplished closure by removal of the CCR material in March 2019, which was verified by the DEQ in October 2019. However, the pond is not considered "closed" under the CCR rule due to current groundwater conditions. Therefore, it is not feasible to complete closure of the CCR unit within the required timeframe due to factors beyond the facility's control, and this demonstration documents the need to extend the timeframe for closure of the East Pond by two years as allowed under Section 257.102(f)(2).

### Certification

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

Owner/Operator Signature

A handwritten signature in black ink that reads "Jason Williams".

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Jason E. Williams

Vice President, Environmental



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY VALLEY REGIONAL OFFICE

Matthew J. Strickler  
Secretary of Natural Resources

P.O. Box 3000, Harrisonburg, Virginia 22801  
(540) 574-7800 Fax (540) 574-7878  
Located at 4411 Early Road, Harrisonburg, VA  
[www.deq.virginia.gov](http://www.deq.virginia.gov)

David K. Paylor  
Director  
  
Amy Thatcher Owens  
Regional Director

October 1, 2019

Dennis A. Slade, CHMM  
Corporate Waste and Remediation Manager  
Virginia Electric and Power Company  
d/b/a Dominion Energy Virginia  
5000 Dominion Boulevard  
Glen Allen, VA 23060

RE: Bremono Bluff Power Station, Solid Waste Permit (SWP) 618  
Closure by Removal Construction Report – East Ash Pond  
Fluvanna County, Virginia

Dear Mr. Slade:

The Department has reviewed the following documents that were prepared on your behalf by Golder Associate Inc. (Golder) for the East Ash Pond in the Bremono Bluff Power Station, SWP618.

- *Closure by Removal Construction Report – East Ash Pond*, dated May 23, 2019 and received on July 25, 2019.
- A construction quality assurance certification, in accordance with the requirements of 9 VAC 20-81-160.D.4. of the Virginia Solid Waste Management Regulations (VSWMR) signed by Andrew T. North, P.E., of Golder and dated May 23, 2019.
- Bremono Closure By Removal Visual Inspection and Acceptance Memorandum For Record – Former CSX Property signed by Andrew T. North, P.E., of Golder and dated August 28, 2019.

The documentation provided and Department visual site inspection conducted on March 14, 2019 indicates that the Coal Combustion Residuals (CCR) in the East Ash Pond and CSX property have been visually removed and over-excavated in accordance with the Surface

Impoundment Closure Plan, Bremo Power Station-West and East Ash Ponds dated May 11, 2018. In addition, the documentation provided satisfies the facility Permit Condition I.F.9.

A copy of the above-mentioned documents and all record drawings must be retained for SWP 618 until closure of the West and East Ash Ponds has been confirmed by the Department. The remaining closure activities of the West and East Ash Ponds include the completions of the CCR removal in the West Ash Pond and the groundwater monitoring in accordance with the Permit Modules XI and XII.

If you have any questions, please do not hesitate to contact JengHwa Lyang, Solid Waste Permit Writer, at (540) 574-7826 or [jenghwa.lyang@deq.virginia.gov](mailto:jenghwa.lyang@deq.virginia.gov).

Sincerely,

A handwritten signature in black ink, reading "Graham H. Simmerman, Jr." in a cursive script.

Graham H. Simmerman, Jr., P.G.  
Regional Land Protection Manager

cc: Kathryn J. Perszyk, DEQ CO  
Gregory W. Adamson, DEQ VRO  
Laura A. Stuart, P.G., DEQ VRO  
JengHwa Lyang, Ph.D., P.E., DEQ VRO  
DEQ File – SWP 618