



CCR Rule Groundwater Protection Standard Exceedance Notification

Bremo Power Station – East Ash Pond Bremo Bluff, Virginia

The initial assessment monitoring groundwater samples were collected from the Bremo Power Station East Ash Pond's groundwater monitoring network in accordance with the federal Coal Combustion Residuals (CCR) Rule. The analytical results from this sampling event were compared to applicable groundwater protection standards (GWPS) and concentrations above GWPS were identified. Per our approved solid waste permit, the pond has been excavated of all CCR material as acknowledged by the Virginia Department of Environmental Quality in October 2019.

40 CFR §257.95(g) requires the owner or operator of an existing CCR unit that is monitoring groundwater in accordance with the assessment monitoring program and has exceeded a GWPS to prepare a notification identifying the Appendix IV constituents that have exceeded the GWPS. The notification is complete when it is placed in the facility's operating record as required by 40 CFR §257.105(h)(8). The following constituent was detected at levels above the GWPS.

CCR Rule Groundwater Protection Standard Exceedances

Constituent	GWPS (parts per billion)	Downgradient Monitoring Well(s)	Concentration (parts per billion)
Cobalt	7.83	MW-21	17.4
		MW-22	30.4
Lithium	40	MW-20D	139
Molybdenum	100	MW-20S	136
		MW-20D	139

The Commonwealth of Virginia adopted by reference the October 4, 2016 version of the federal CCR rule 40 CFR §257 into 9VAC20-81-800 of the Virginia Solid Waste Management Regulations. Amendments to 40 CFR §257 after October 4, 2016 were not incorporated into 9VAC20-81-800. As a result, health-based GWPSs adopted under the August 29, 2018 amendment to the federal CCR Rule are not applicable to 9VAC20-81-800. Under 9VAC20-81-800, the following constituent was detected in one or more downgradient wells above the Virginia CCR Rule GWPS.

Virginia CCR Rule Groundwater Protection Standard Exceedances

Constituent	GWPS (parts per billion)	Downgradient Monitoring Well(s)	Concentration (parts per billion)
Cobalt	7.83	MW-21	17.4
		MW-22	30.4
Lithium	25 ⁽¹⁾	MW-20D	139
Molybdenum	46.1	MW-20S	136
		MW-20D	139

⁽¹⁾ = Values represent highest laboratory Quantitation Limit (QL) for the constituent based on background data. Future QL values are subject to change; however, GWPS cannot be less than the value listed.