

CCR Rule Semi-Annual Remedy Selection Progress Report

Bremo Power Station – North Pond Bremo Bluff, Virginia April 3, 2024

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 tenth semi-annual remedy selection progress report for the Bremo Power Station North Pond located in Bremo Bluff, Virginia.

Assessment of corrective measures were initiated for the North Pond on December 5, 2018, in response to groundwater protection standard exceedances in samples collected from one or more downgradient groundwater monitoring wells. Pursuant to 40 CFR §257.96, 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 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 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 Pond under the solid waste permit. Therefore, semi-annual groundwater monitoring data is also compared to the DEQ approved GPS;
- In support of the closure by removal requirement set forth in Code of Virginia § 10.1-1402.03, 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 Pond;

- Installed permanent pumps and associated piping for the management of deep well pore water and transfer to West Pond for interim storage during North Pond closure. Pumps were commissioned and in service on March 17, 2020;
- Geotechnical evaluation of North Pond to determine extent and characteristics of CCR material to aid in removal sequencing;
- Completed an ACM addendum in November 2020 to include additional constituents identified at concentrations above the Virginia Solid Waste Permit GPS;
- Submitted a Solid Waste Part A permit application to the Virginia DEQ in July 2021 for the siting of a new CCR landfill adjacent to the Bremo Power Station for the disposition of the CCR material from the North Pond. The Part A permit (SWP No. 627) is considered administratively and technically complete and is under DEQ Central Office review prior to issuance;
- In October 2021, completed additional evaluations of groundwater and soil characteristics in an around the North Pond to enhance conceptual site model;
- Held a public meeting on December 8, 2021, to discuss the results of the corrective measures assessment;
- In response to DEQ comments, prepared revised Nature and Extent Study (NES) and ACM reports for submittal to the operating record and DEQ on October 3, 2022; and
- Submitted a Solid Waste Part B permit application to the Virginia DEQ on March 21, 2023 (resubmitted on July 25, 2023), for the adjacent Bremo Bluff Fossil Fuel Combustion Products Management Facility (SWP No. 627) to include detailed engineering design and operating plans for the proposed facility.

Planned Activities

The following activities are planned:

- In coordination with owner's engineer, continue to develop a detailed scope of work for the removal of the CCR materials including a water management plan during the ash removal;
- Develop and submit a Solid Waste Permit Modification for SWP 618 to address the closure of the North Ash Pond;
- Complete an ACM Addendum to include zinc, which was identified at a concentration above the Virginia Solid Waste Permit GPS;
- Continue to comply with DEQ solid waste permit corrective action program process for selection of final remedy; and
- The next semi-annual progress report will be completed no later than September 30, 2024.