CCR Rule Semi-Annual Remedy Selection Progress Report

Bremo Power Station – North Pond
Bremo Bluff, Virginia
October 24, 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 third 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 now also compared to the DEQ approved GPS. The first 2020 semi-annual groundwater monitoring event detected concentrations of boron, cobalt, lithium, molybdenum, nickel, and silver at concentrations above GPS;
- In support of the closure by removal requirement set forth in the 2019 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 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; and
- Issued a request for proposal to consultant engineers to conduct studies of the geochemical environment and natural recovery capacities of the uppermost aquifer beneath the Pond.

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;
- Complete an ACM amendment to include additional constituents identified at concentrations above the Virginia Solid Waste Permit GPS;
- Award contract to consultant engineer to conduct studies of the geochemical environment and natural recovery capacities of the uppermost aquifer beneath the Pond; and
- The next semi-annual progress report will be completed no later than April 22, 2021.