



Extension of Closure Timeframe for CCR Surface Impoundments

Date: December 14, 2021

Station: Bremono Power Station

Unit: West 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 West Ash Pond at the Bremono Power Station in Bremono, Virginia. In January 2020, CCR material removal from the West 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 April 17, 2020 (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 West 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 January 2020, which was verified by the DEQ in April 2020. 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".

Jason E. Williams

Vice President, Environmental



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY VALLEY REGIONAL OFFICE

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David K. Paylor
Director

Amy Thatcher Owens
Regional Director

Matthew J. Strickler
Secretary of Natural Resources

April 17, 2020

Dennis A. Slade, CHMM
Corporate Waste and Remediation Manager
Dominion Energy Services
5000 Dominion Boulevard
Glen Allen, VA 23060

RE: Bremono Bluff Power Station, Solid Waste Permit (SWP) 618
Closure by Removal Construction Report – West 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 West Ash Pond in the Bremono Bluff Power Station, SWP618.

- *Closure by Removal Construction Report – West Ash Pond*, dated March 25, 2020 and received on April 3, 2020.
- 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 March 25, 2020.

The documentation provided indicates that the Coal Combustion Residuals (CCR) in the west Ash Pond has been visually removed and over-excavated in accordance with the Surface Impoundment Closure Plan, Bremono 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 activity of the West and East Ash Ponds include the completion of 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.

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