SURFACE IMPOUNDMENT CLOSURE PLAN

Bremo Station – West Ash Pond and East Ash Pond Solid Waste Permit 618 Fluvanna County, Virginia

Prepared for:



Dominion Energy Virginia 120 Tredegar Street Richmond, Virginia 23219

Prepared by: Schnabel Engineering 9800 Jeb Stuart Parkway, Suite 100 Glen Allen, Virginia 23059

Schnabel Reference No. 22130437.034

May 11, 2018 Revised September 2018 Revised August 2019 Last Amended November 13, 2023



TABLE OF CONTENTS

CERTI	FICATIO	N	1
1.0	CLOSI	RE PURPOSE	2
	1.1	Impoundment Information	2
		1.1.1 West Ash Pond	2
		1.1.2 East Ash Pond	2
2.0	CLOSI	RE TIMEFRAMES	2
	2.1	Closure Criteria	
	2.2	Closure Status	3
3.0	INVEN	ORY REMOVAL AND DISPOSAL	4
	3.1	Waste Removal and Decontamination	4
	3.2	Sampling and Testing Program	4
	3.3	Other Areas	5
4.0	CLOS	RE OF TREATMENT UNITS AND LAGOONS	5
5.0	CLOS	RE IMPLEMENTATION	5
	5.1	Posting	5
	5.2	Certification	5
	5.3	Post-Closure Use	
6.0	соѕт	ESTIMATE	6

TABLES

ble 1: Closure Schedule4

ATTACHMENTS

- Attachment 1: Closure by Removal Drawings (By Others)
- Attachment 2: Cost Estimate (By Others)
- Attachment 3: DEQ Approval for EAP CCR Removal Completion
- Attachment 4: DEQ Approval for WAP CCR Removal Completion

CERTIFICATION

This Closure Plan (Plan) for the Bremo Station's (Station) West Ash Pond (WAP) and East Ash Pond (EAP) was prepared by Schnabel Engineering (Schnabel). The document and Certification/Statement of Professional Opinion are based on and limited to information that Schnabel has relied on from Dominion Energy and others, but not independently verified.

On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the Commonwealth of Virginia that this document has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances, at the same time, and in the same locale. It is my professional opinion that the document was prepared consistent with the requirements in the United States Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" (CCR Rule, 40 CFR §257 Subpart D) as well as the Virginia Department of Environmental Quality's Virginia Solid Waste Management Regulations (VSWMR, 9VAC20-81).

The use of the word "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion and is not and shall not be interpreted or construed as a guarantee, warranty, or legal opinion.

James R. DiFrancesco, P.E.

Principal / Practice Leader Solid Waste

Name

Signature /

Title

November 13, 2023

Date



1.0 CLOSURE PURPOSE

This Closure Plan (Plan) was prepared for the inactive Coal Combustion Residuals (CCR) surface impoundments at the Bremo Station (Station), the West Ash Pond (WAP) and the East Ash Pond (EAP). The Station is owned and operated by Virginia Electric and Power Company d/b/a Dominion Energy Virginia (Dominion Energy) and is located in Bremo Bluff, Virginia at 1038 Bremo Road. The WAP and EAP are regulated under the Virginia Department of Environmental Quality (DEQ) Solid Waste Permit (SWP) 618 and are subject to the closure requirements in the United States Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" (CCR Rule, 40 CFR §257 Subpart D) as well as the DEQ's Virginia Solid Waste Management Regulations (VSWMR, 9VAC20-81). Schnabel Engineering (Schnabel) has prepared this Plan in accordance with the requirements of the CCR Rule and VSWMR on behalf of Dominion Energy.

1.1 Impoundment Information

1.1.1 West Ash Pond

The WAP is approximately 17 acres in size and was used as a water treatment pond to settle and manage low-volume wastewaters, including CCR, until 2014 when the Station converted from a coal-fired power plant to a natural gas-fired power plant, which has since been decommissioned. No new CCR was placed in the WAP after the conversion. The WAP contained approximately 327,000 cubic yards (CY) of CCR prior to the start of excavation activities.

The WAP is regulated under the following permits:

- DEQ SWP 618
- DEQ Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VA0004138
- DEQ VPDES Construction General Permit No. VAR10H875
- Virginia Department of Conservation and Recreation (DCR) Operation and Maintenance Certificate, Inventory No. 06511

1.1.2 East Ash Pond

The EAP is approximately 26.5 acres in size and was used for the storage of CCR generated during the operation of the Station. The pond was placed into service in the 1930's and was capped with soil fill in the mid-1980's, except for the eastern portion of the pond which allowed for pass-through of drainage from the adjacent area to the north. The EAP contained approximately 1,800,000 CY of CCR prior to the start of excavation activities.

The EAP is regulated under the following permits:

- DEQ SWP 618
- DEQ VPDES Permit No. VA0004138
- DEQ VPDES Construction General Permit No. VAR10H875
- DCR Operation and Maintenance Certificate, Inventory No. 00815

2.0 CLOSURE TIMEFRAMES

2.1 Closure Criteria

This Plan provides for the closure of the WAP and EAP by removal of CCR.

Closure is considered complete under 40 CFR 257.102(c) of the CCR Rule when:

- 1. A Professional Engineer licensed in the Commonwealth of Virginia certifies CCR removal and decontamination, i.e., constituent concentration removal, throughout the CCR unit and any areas affected by releases from the CCR unit; and,
- Groundwater monitoring concentrations do not exceed the groundwater protection standards established pursuant to 40 CFR §257.95(h) for constituents listed in Appendix IV of the CCR Rule.

Closure is considered complete under DEQ SWP 618 when:

- 1. A Professional Engineer licensed in the Commonwealth of Virginia certifies CCR has been removed from the CCR unit and the area within the CCR unit has been over-excavated by approximately 6 inches; and,
- 2. The CCR unit's downgradient groundwater monitoring wells do not exhibit levels in excess of a maximum contaminant limit (MCL) or established groundwater protection standard for any CCR Rule Appendix IV constituent after a minimum of ten sampling events have occurred after CCR material has been verified as removed by a Professional Engineer licensed in the Commonwealth of Virginia.

2.2 Closure Status

At the time of this Plan amendment, all CCR in the WAP and EAP has been removed and temporarily relocated to the North Ash Pond (NAP), an approximately 69-acre surface impoundment at the Station, for storage until a new, captive industrial landfill is built for final CCR storage. The NAP closure will occur in accordance with the Closure Plan for the NAP, the VSWMR, the CCR Rule, and §10.11402.03 of the Virginia Waste Management Act.

In March 2019, CCR removal and decontamination in the EAP was completed, followed by the over-excavation of the area within the CCR unit by a approximately 6 inches in conformance with this Plan and SWP 618. The DEQ provided verification of these activities in a letter dated October 1, 2019, which is included as Attachment 3. The EAP has since been repurposed as a stormwater management pond, the East Stormwater Management Pond, to serve the Station's long-term stormwater management needs.

In January 2020, CCR removal and decontamination in the WAP was completed, followed by the over-excavation of the area within the CCR unit by approximately 6 inches in conformance with this Plan and SWP 618. The DEQ provided verification of these activities in a letter dated April 17, 2020, which is included as Attachment 4. The WAP has since been repurposed as a process water pond in support of the NAP closure activities. Once NAP closure activities are complete, the process water pond will be decommissioned and graded to leave an open vegetated area, as shown in the Closure by Removal Drawings provided in Attachment 1.

In December 2021, the WAP and EAP were working through the Corrective Action process due to groundwater monitoring concentrations; therefore; demonstrations were made for the EAP and WAP to document the need to extend the closure timeframe set forth in the CCR Rule by two years.

At the time of this Plan amendment, groundwater monitoring concentrations for the WAP do not exceed the groundwater protection standards established pursuant to 40 CFR §257.95(h) for constituents listed in

Appendix IV of the CCR Rule; therefore, certification of closure of the WAP in accordance with the CCR Rule is anticipated by December 2023. The EAP is still in the Corrective Action process under the CCR Rule, this Plan, and SWP 618.

Table 1 below outlines the schedule for closure activities.

Activity	Date
EAP CCR Removal Completion	March 2019
DEQ Approval for EAP CCR Removal Completion	October 2019
WAP CCR Removal Completion	January 2020
DEQ Approval for WAP CCR Removal Completion	April 2020
EAP Closure Extension Demonstration	December 2021
WAP Closure Extension Demonstration	December 2021
WAP Closure Certification per the CCR Rule	By December 2023
EAP Closure Certification per the CCR Rule	Based on groundwater monitoring results
WAP Closure Certification per DEQ SWP 618	Based on groundwater monitoring results
EAP Closure Certification per DEQ SWP 618	Based on groundwater monitoring results

Table 1 - Closure Schedule

3.0 INVENTORY REMOVAL AND DISPOSAL

3.1 Waste Removal and Decontamination

The EAP and WAP are in the process of being closed by the removal of CCR in accordance with the CCR Rule provisions and the VSWMR. The removal of accumulated CCR, such that no residual materials remained visible, followed by the over-excavation of the area within the CCR unit by approximately 6 inches has been completed. CCR removed against embankments involved excavation of the embankment faces to a near-vertical condition, and immediately after CCR removal, over-excavation, and inspection of these areas, fill soil was backfilled and compacted against the embankment to re-establish stable slopes. For decontamination of rock, existing concrete designated to remain, or other similar hard surfaces (e.g., pipes or foundation supports to remain), the surfaces were cleaned to a visually clean condition through pressure washing. Removed CCR and CCR-mixed soils have been consolidated in the NAP for temporary storage.

3.2 Sampling and Testing Program

After removal of the 6-inch over-excavation material, areas within the CCR unit were visually inspected to verify the over-excavation had been achieved. These areas were further inspected by targeted soil cores for visual inspection, dug by hand using a hand auger or similar tool to a depth of at least 6 inches and at a frequency of at least one core per acre.

Verification surveys were prepared by a Commonwealth of Virginia-licensed Land Surveyor and consisted

Bremo Station – West Ash Pond and East Ash Pond, SWP 618 Surface Impoundment Closure Plan

of the visually clean CCR removal surface survey and the over-excavation surface survey to verify the approximate 6-inch over-excavation. Certification of the completion of CCR removal in the EAP and WAP was provided by a Commonwealth of Virginia-licensed Professional Engineer and approved by the DEQ (see Attachments 3 and 4, respectively).

Groundwater monitoring will be continued in accordance with the approved Groundwater Monitoring Plan to meet the closure by removal standard set forth in 40 CFR 257.102(c) and SWP 618, as applicable.

3.3 Other Areas

During the evaluation of the nature and extent of CCR in and around the EAP, a thin area of residual CCR material was identified along a portion of the toe of the southern embankment. Additional permits from the Corps of Engineers and Fluvanna County were obtained to authorize removal of materials in this area. The identified materials were removed to a visually clean condition and relocated to the NAP. Verification and documentation of the removal was provided by a Virginia-licensed Professional Engineer and approved by the DEQ (see Attachment 3). After removal and verification, the area was restored with equivalent vegetation, as per the applicable permits.

4.0 CLOSURE OF TREATMENT UNITS AND LAGOONS

There are no supporting leachate or waste treatment surface impoundments or lagoons associated with the EAP or WAP.

5.0 CLOSURE IMPLEMENTATION

5.1 Posting

One sign will be posted at the site entrance to each pond notifying all persons of the final closure and prohibition against further receipt of CCR. Unauthorized access to the site will be controlled by natural barriers, fencing, and locked gates.

5.2 Certification

Within 30 days of closure completion under 40 CFR §257.102(c), a certification statement by a Professional Engineer licensed in the Commonwealth of Virginia will be placed in the operating record and posted on Dominion Energy's publicly accessible website. The certification statement should generally read as follows:

I certify that closure of the [Pond] at the Bremo Station has been completed in accordance with the Closure Plan [Date on the Closure Plan or most recent amendment] and the requirements of 40 CFR §257.102(c).

Within 30 days of closure completion under DEQ SWP 618, a certification statement by a Professional Engineer licensed in the Commonwealth of Virginia will be provided to the DEQ along with supporting documentation as required by this Plan. The certification statement should generally read as follows:

I certify that closure of the [Pond] at the Bremo Station has been completed in accordance with the Closure Plan [Date on the Closure Plan or most recent amendment] for solid waste permit number 618 issued to Dominion Energy, with the exception of the following discrepancies: [To Be Determined]

In addition, a sign(s) was (were) posted on [Date of posting] at the site entrance notifying all persons of the closing [and state other notification procedures if applicable] and barriers [indicate type] were installed at [location] to prevent new waste from being deposited.

A survey plat prepared by [Name] was submitted to Fluvanna County, Virginia on [Date]. A copy of the survey plat is included with this certification.

A notation was recorded on the deed to the property on [Date]. A copy of the revised deed is attached to this certification.

[Signature, date, and stamp of Professional Engineer]

The certification will be posted on Dominion Energy's publicly accessible internet site and placed in the operating record.

5.3 Post-Closure Use

No post-closure use of the WAP area has been proposed at the time of this Plan. The EAP has been repurposed as the East Stormwater Management Pond to serve the site's long term stormwater management needs.

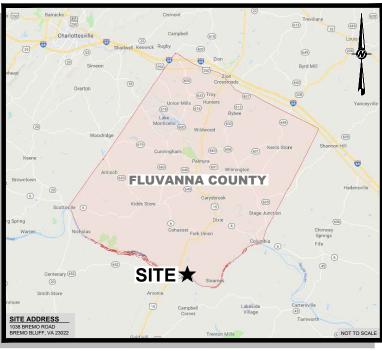
6.0 COST ESTIMATE

The closure and post-removal cost estimate for the WAP and EAP is \$17,112,065. This estimated amount covers the remaining groundwater monitoring and closure certification activities under this Plan.

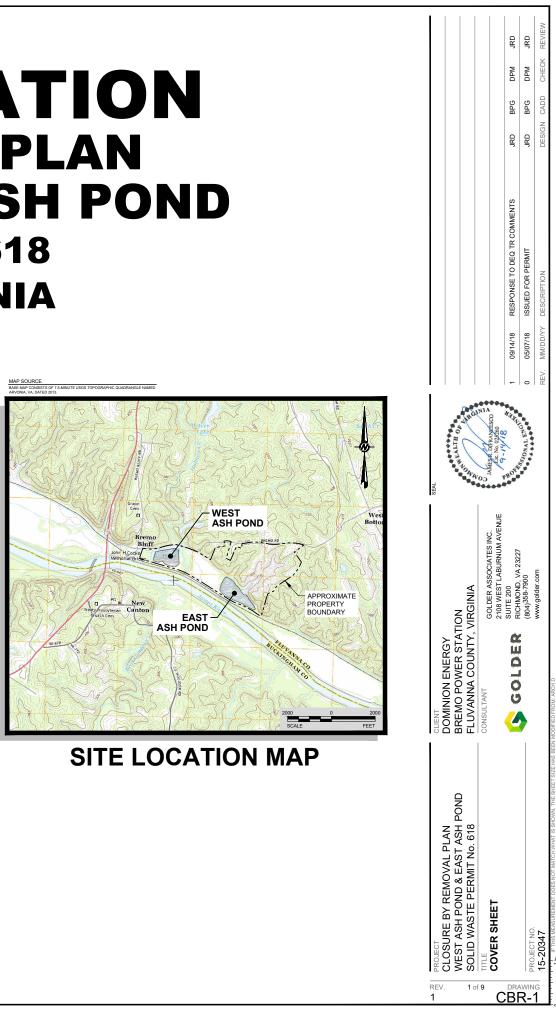
ATTACHMENT 1

CLOSURE BY REMOVAL DRAWINGS (BY OTHERS)

DOMINION ENERGY BREMO POWER STATION CLOSURE BY REMOVAL PLAN WEST ASH POND & EAST ASH POND **SOLID WASTE PERMIT No. 618 FLUVANNA COUNTY, VIRGINIA SEPTEMBER 2018**



	DRAWING INDEX
DRAWING No.	DRAWING TITLE
CBR-1	COVER SHEET
CBR-2	WEST ASH POND PRE-CLOSURE TOPOGRAPHY (APPROXIMATE BOTTOM OF POND)
CBR-3	WEST ASH POND CLOSURE BY REMOVAL PLAN
CBR-4	WEST ASH POND CONCEPTUAL FINAL GRADING PLAN
CBR-5	WEST ASH POND CROSS-SECTIONS
CBR-6	EAST ASH POND PRE-CLOSURE TOPOGRAPHY (APPROXIMATE BOTTOM OF POND)
CBR-7	EAST ASH POND CLOSURE BY REMOVAL PLAN
CBR-8	EAST ASH POND CONCEPTUAL FINAL GRADING PLAN
CBR-9	EAST ASH POND CROSS-SECTIONS



VICINITY MAP

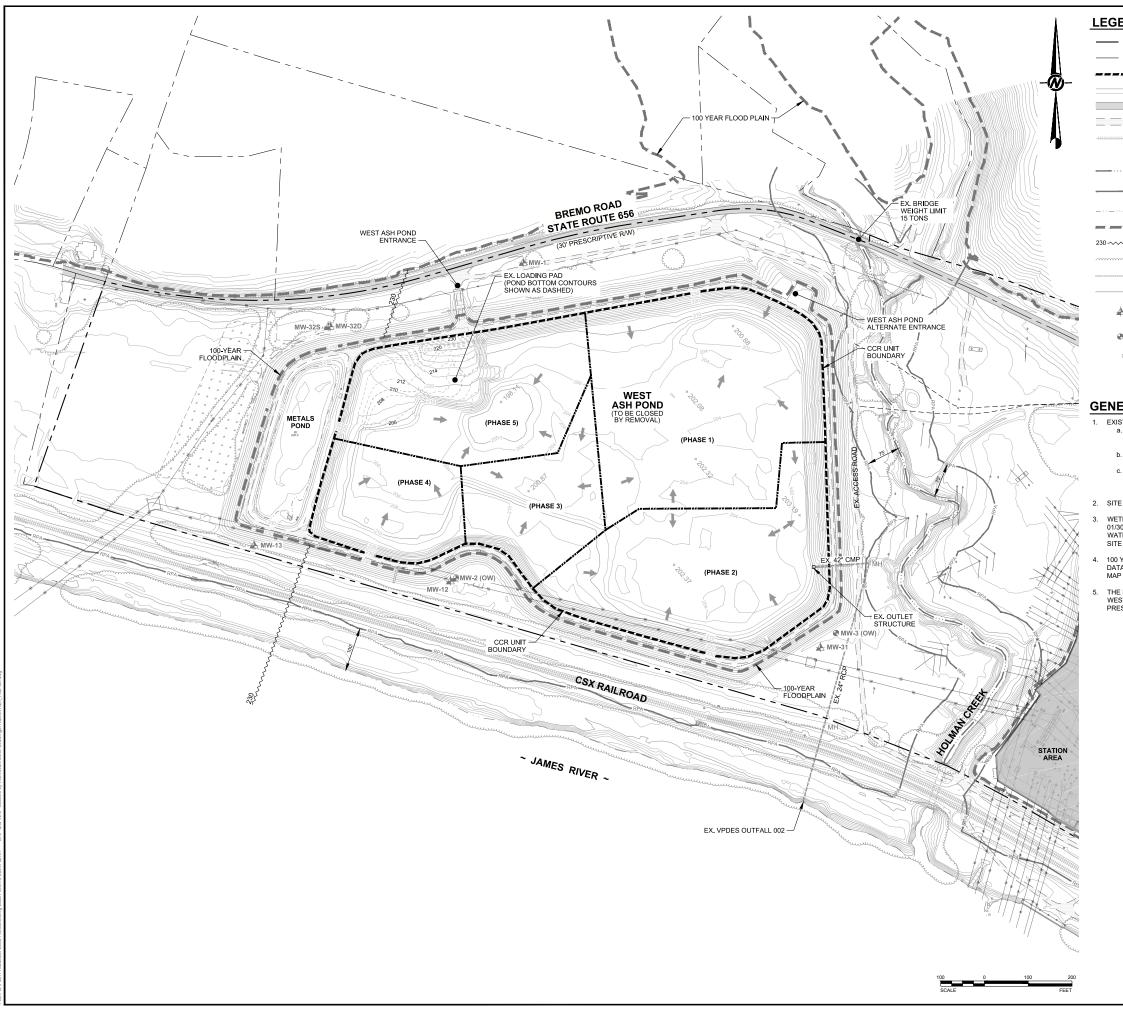
PREPARED BY:



GOLDER ASSOCIATES, INC. MAIN CONTACT: RON DIFRANCESCO, P.E. 2108 W. LABURNUM AVE., SUITE 200 RICHMOND, VIRGINIA 23227 PHONE: (804) 358-7900 EMAIL: RON DIFRANCESCO@GOLDER.COM **PREPARED FOR:**



DOMINION ENERGY MAIN CONTACT: MIKE GLAGOLA 5000 DOMINION BOULEVARD GLEN ALLEN, VIRGINIA 23060 PHONE: (804) 273-4547 EMAIL: MICHAEL.A.GLAGOLA@DOMINIONENERGY.COM



END			
	DOMINION PROPERTY BOUNDARY		
	ADJACENT PROPERTY BOUNDARY		
	CCR UNIT BOUNDARY		
300	EXISTING TOPOGRAPHIC CONTOURS (2' INTERVALS)		
	EXISTING PAVED ROAD		
	EXISTING UNPAVED ROAD		
*****	EXISTING RAILROAD		
4	WETLANDS		
	CREEK/STREAM CENTERLINE		
RPA	LIMITS OF RIPARIAN PROTECTION AREA (PER FLUVANNA COUNTY ORDINANCE)		
	APPROXIMATE EDGE OF SURFACE WATER		
	LIMITS OF 100-YR FLOOD PLAIN		
~~~~~~	BASE FLOOD ELEVATION (100-YEAR, SEE NOTE 4)		
	EXISTING TREE LINE		
,,	EXISTING FENCE		
	EXISTING OVERHEAD UTILITY LINE		
MW-1	EXISTING MONITORING WELL LOCATION AND IDENTIFICATION (CCR RULE)		
₽MW-2 (OW)	EXISTING OBSERVATION WELL LOCATION AND IDENTIFICATION		
□ MH	EXISTING MANHOLE		
<b>→</b>	EXISTING SURFACE WATER FLOW DIRECTION		

EXISTING CONDITIONS COMPILED FROM:

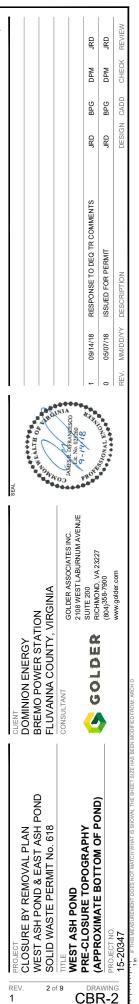
- a. AERIAL TOPOGRAPHIC SURVEY PREPARED BY McKENZIE SNYDER, INC., DATE OF AERIAL PHOTO: 1/16/15 [CONTROL PREPARED BY H&B SURVEYING & MAPPING (H&B)]
- BOUNDARY SURVEY PREPARED BY H&B SURVEYING AND MAPPING, LLC DATED 04/27/15.
   EXISTING TOPOGRAPHY WITHIN THE LIMITS OF THE WEST ASH POND BASED ON FIELD SURVEY BY H&B SURVEYING AND MAPPING DATED 07/06/17. TOPO REPRESENTS THE BOTTOM OF POND.

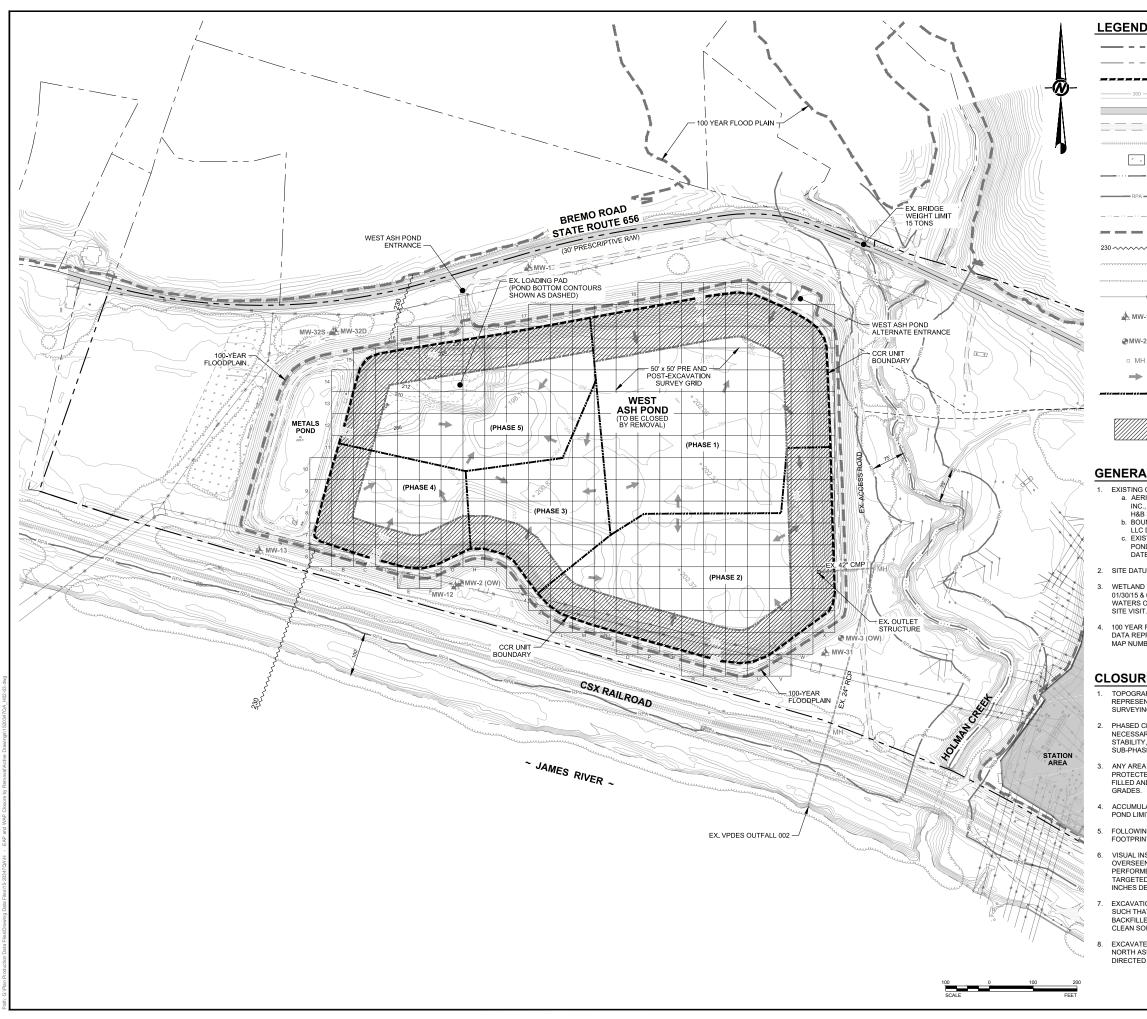
2. SITE DATUM: NAD83 / NAVD88

WETLAND DELINEATION BY DOMINION ENVIRONMENTAL SERVICES ON 01/30/15 & 02/05/15 AND BY GOLDER ASSOCIATES ON 03/16/15 & 03/25/15. WATERS OF THE U.S. CONFIRMED BY THE USACE DURING JUNE 4, 2015 SITE VISIT.

100 YEAR FLOOD PLAIN DELINEATION BASED ON FLOOD ELEVATION DATA REPRESENTED ON FEMA FLOOD INSURANCE RATE MAP (FIRM), MAP NUMBER 51065C0260C, EFFECTIVE DATE: 05/16/2008.

THE MAJORITY OF WATER AND ASH HAS BEEN REMOVED FROM THE WEST ASH POND, AND ONLY MANAGED CONTACT STORMWATER IS PRESENT.





END						141
	DOMINION PROPERTY BOUNDARY			ЪЪ	ЪЪ	110
	ADJACENT PROPERTY BOUNDARY					2
	CCR UNIT BOUNDARY			MAD	DPM	
	EXISTING TOPOGRAPHIC CONTOURS (2' INTERVALS)					
	EXISTING PAVED ROAD			BPG	BPG	
	EXISTING UNPAVED ROAD					14
	EXISTING RAILROAD			ЛRD	ЪЪ	
4 V	WETLANDS				´	
	CREEK/STREAM CENTERLINE					
RPA	LIMITS OF RIPARIAN PROTECTION AREA (PER FLUVANNA COUNTY ORDINANCE)			0		
	APPROXIMATE EDGE OF SURFACE WATER			ENT		
	LIMITS OF 100-YR FLOOD PLAIN			MMO		
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	BASE FLOOD ELEVATION (100-YEAR, SEE NOTE 4)			TRO		
	EXISTING TREE LINE			DEQ	RMI	
	EXISTING FENCE			10	DR PE	
	EXISTING OVERHEAD UTILITY LINE			ONSI	SSUED FOR PERMIT	Laia
MW-1	EXISTING MONITORING WELL LOCATION AND IDENTIFICATION (CCR RULE)			RESPONSE TO DEQ TR COMMENTS	ISSUE	
MW-2 (OW)	EXISTING OBSERVATION WELL LOCATION AND IDENTIFICATION			09/14/18	05/07/18	
• MH	EXISTING MANHOLE			09/1	05/0	A A A A
⇒	EXISTING SURFACE WATER FLOW DIRECTION					2
المحرية بر المحدوم بر بر المحدوم بر بر المحدو	APPROXIMATE CLEAN CLOSURE PHASE LIMITS (SUBJECT TO CHANGE BASED ON FIELD CONDITIONS DURING EXCAVATION AND MAY INCLUDE SUB-PHASES)			-	0	
	DENOTES APPROXIMATE LIMITS OF CRITICAL AREAS SUBJECT TO BACKFILL FOR ACCESS AND	OF IR	GINIA OUSSION	A STA	NO.	

- EXISTING CONDITIONS COMPILED FROM:
- a. AERIAL TOPOGRAPHIC SURVEY PREPARED BY McKENZIE SNYDER, INC., DATE OF AERIAL PHOTO: 1/16/15 [CONTROL PREPARED BY H&B SURVEYING & MAPPING (H&B)]

SLOPE STABILITY

- H&B SURVEYING & MAPPING (H&B)] b. BOUNDARY SURVEY PREPARED BY H&B SURVEYING AND MAPPING, LLC DATED 04/27/15
- c. EXISTING TOPOGRAPHY WITHIN THE LIMITS OF THE WEST ASH POND BASED ON FIELD SURVEY BY H&B SURVEYING AND MAPPING DATED 07/06/17. TOPO REPRESENTS THE BOTTOM OF POND.

2. SITE DATUM: NAD83 / NAVD88

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CLOSURE BY REMOVAL NOTES

TOPOGRAPHY SHOWN WITHIN LIMITS OF THE WEST ASH POND, REPRESENTS THE POND BOTTOM BASED ON FIELD SURVEY BY H&B SURVEYING AND MAPPING DATED 07/06/17.

PHASED CLOSURE OF THE WEST POND MAY BE SEQUENCED AS NECESSARY TO ADDRESS ISSUES RELATED TO ACCESS AND SLOPE STABILITY, AND TO MINIMIZE CONTACT STORMWATER AREAS SUB-PHASES MAY BE REQUIRED FOR REGULATORY APPROVAL.

ANY AREA CERTIFIED AS ACHIEVING CLOSURE BY REMOVAL IS TO BE PROTECTED FROM CCR AND CONTACT STORMWATER, AND MAY BE FILLED AND/OR RESHAPED AS NEEDED PRIOR TO ACHIEVING FINAL GRADES.

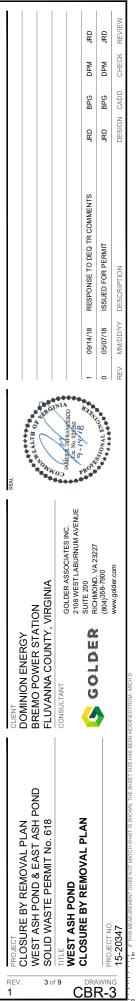
ACCUMULATED CCR SHALL BE REMOVED FROM SURFACES WITHIN THE POND LIMITS SUCH THAT NO CCR REMAINS VISIBLE.

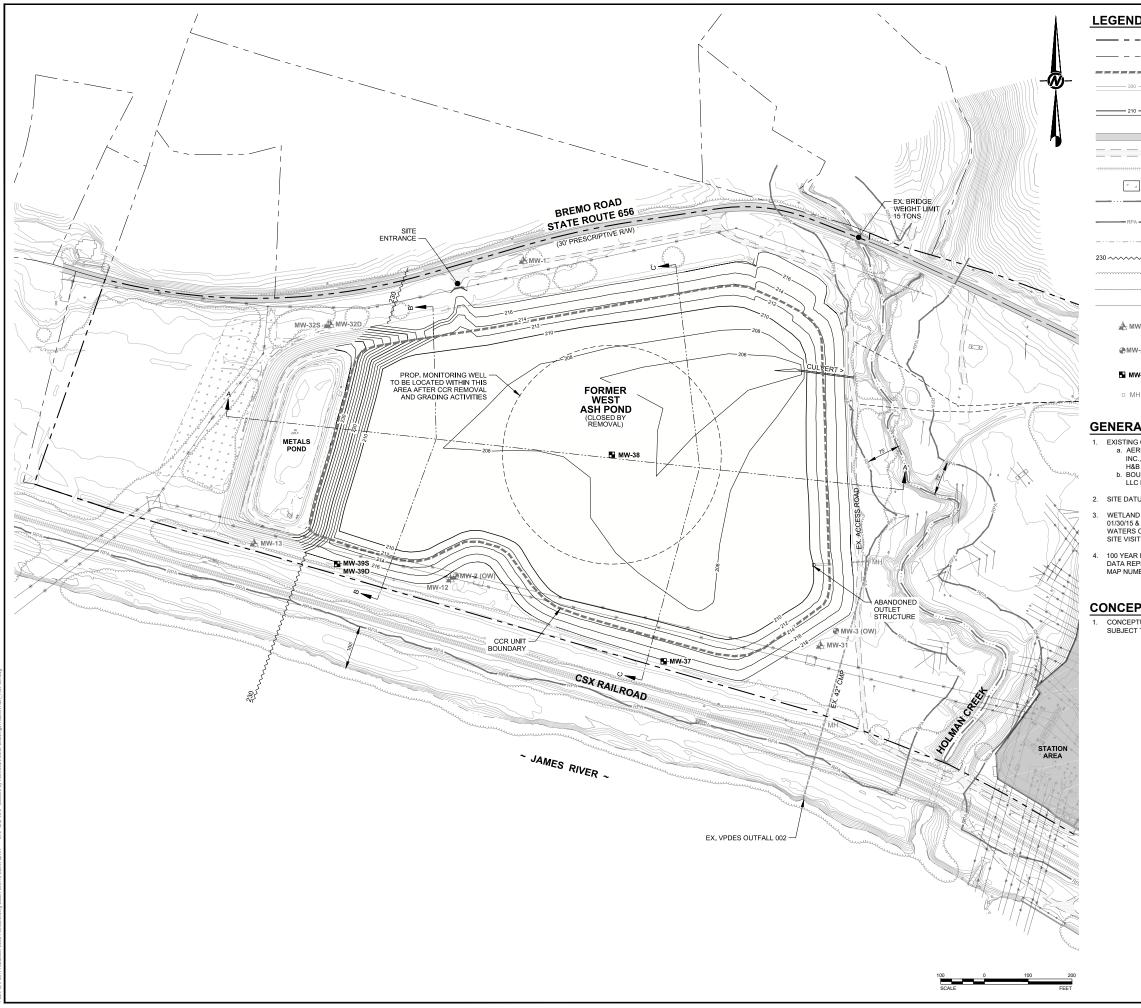
FOLLOWING VISUAL-CLEAN CONDITIONS, OVER-EXCAVATE THE REMOVAL FOOTPRINT BY AT LEAST SIX INCHES.

VISUAL INSPECTION AND TARGETED SUBGRADE VISUAL SAMPLING TO BE OVERSEEN BY OWNER'S ENGINEER REPRESENTATIVE. SAMPLING TO BE PERFORMED AT A FREQUENCY OF AT LEAST ONE TEST PER ACRE. TARGETED SAMPLING TO CONSIST OF HAND-DUG HOLES AT LEAST SIX INCHES DEEP.

EXCAVATION OF SLOPES STEEPER THAN 2:1 SHALL BE SEQUENCED SUCH THAT THE SLOPES CAN BE EXCAVATED, INSPECTED, AND BACKFILLED IN THE SHORTEST TIME POSSIBLE. BACKFILL SLOPES WITH CLEAN SOIL FILL AT NO STEEPER THAN 2:1.

EXCAVATED CCR AND SOIL-CCR MIXTURES SHALL BE CONSOLIDATED IN NORTH ASH POND OR TAKEN TO AN OFF-SITE DISPOSAL FACILITY AS DIRECTED BY DOMINION.





END	
	DOMINION PROPERTY BOUNDARY
	ADJACENT PROPERTY BOUNDARY
	CCR UNIT BOUNDARY
	EXISTING TOPOGRAPHIC CONTOURS (2' INTERVALS) (FROM AERIAL SURVEY - SEE GENERAL NOTE 1a)
210	CONCEPTUAL FINAL GRADE CONTOURS (2' INTERVALS)
	EXISTING PAVED ROAD
	EXISTING UNPAVED ROAD
	EXISTING RAILROAD
a	WETLANDS
	CREEK/STREAM CENTERLINE
RPA	LIMITS OF RIPARIAN PROTECTION AREA (PER FLUVANNA COUNTY ORDINANCE)
	APPROXIMATE EDGE OF SURFACE WATER
~~~~~~	BASE FLOOD ELEVATION (100-YEAR, SEE NOTE 4)
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	EXISTING TREE LINE
	EXISTING FENCE
	EXISTING OVERHEAD UTILITY LINE
A MW-1	EXISTING MONITORING WELL LOCATION AND IDENTIFICATION (CCR RULE)
•MW-2 (OW)	EXISTING OBSERVATION WELL LOCATION AND IDENTIFICATION
MW-38	PROPOSED MONITORING WELL LOCATION AND IDENTIFICATION
• MH	EXISTING MANHOLE

- EXISTING CONDITIONS COMPILED FROM:
 a. AERIAL TOPOGRAPHIC SURVEY PREPARED BY McKENZIE SNYDER, INC., DATE OF AERIAL PHOTO: 1/16/15 [CONTROL PREPARED BY H&B SURVEYING & MAPPING (H&B)]
 - BOUNDARY SURVEY PREPARED BY H&B SURVEYING AND MAPPING, LLC DATED 04/27/15.

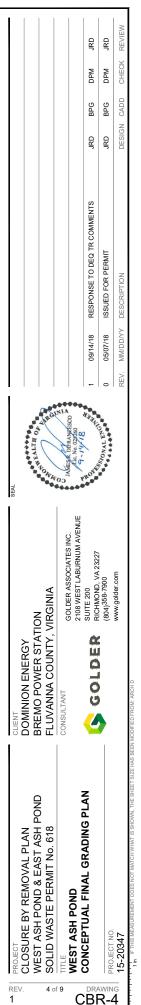
2. SITE DATUM: NAD83 / NAVD88

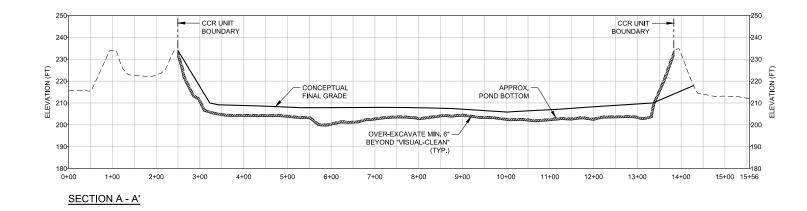
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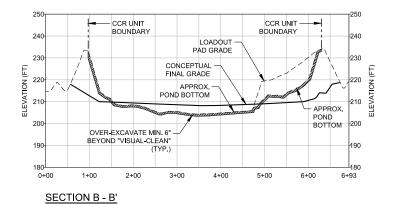
100 YEAR FLOOD PLAIN DELINEATION BASED ON FLOOD ELEVATION DATA REPRESENTED ON FEMA FLOOD INSURANCE RATE MAP (FIRM), MAP NUMBER 51065C0260C, EFFECTIVE DATE: 05/16/2008.

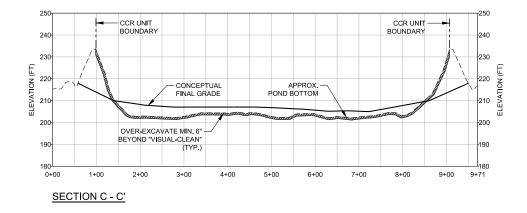
CONCEPTUAL FINAL GRADING NOTE

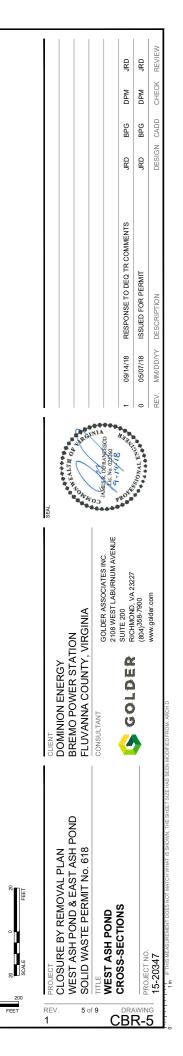
CONCEPTUAL FINAL GRADING IS SHOWN FOR REFERENCE ONLY AND IS SUBJECT TO CHANGE.



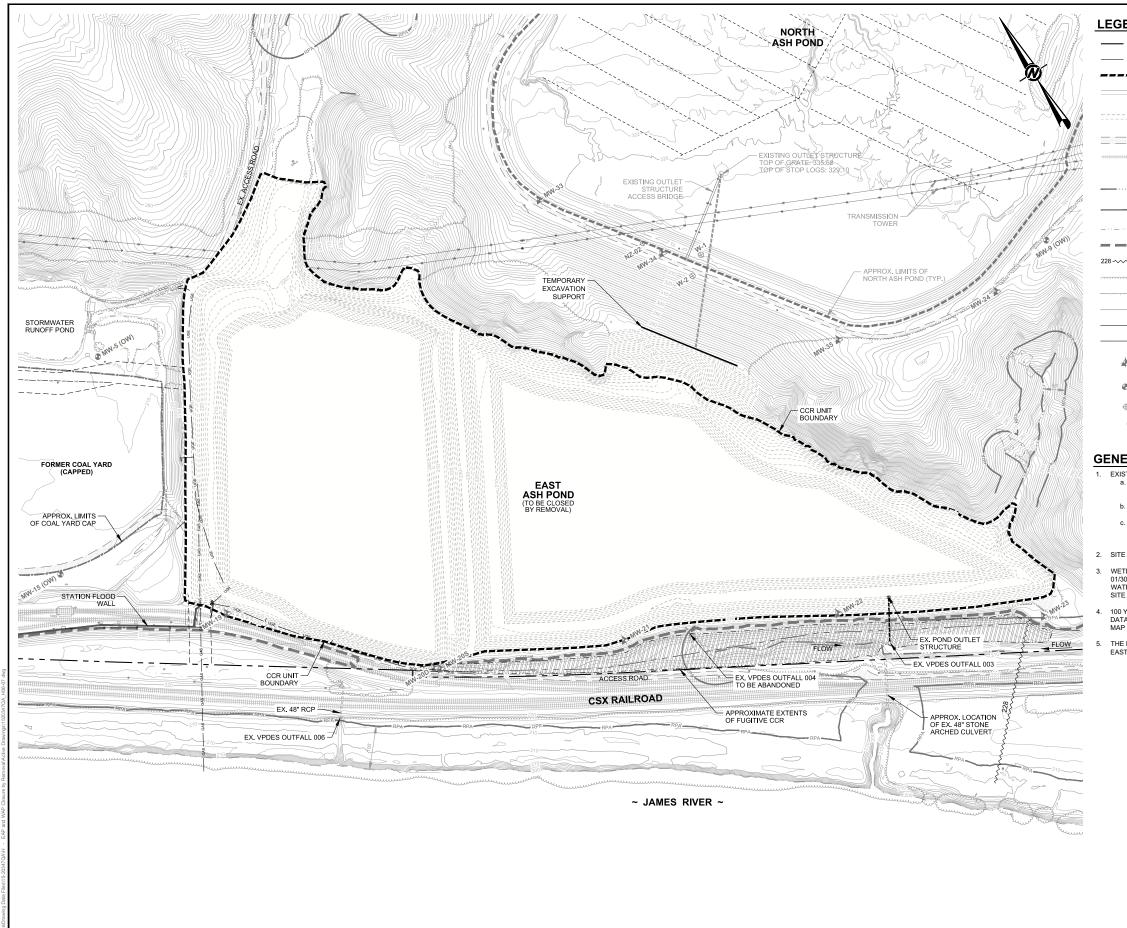








100 0 SCALE



END	
·	DOMINION PROPERTY BOUNDARY
	ADJACENT PROPERTY BOUNDARY
	CCR UNIT BOUNDARY
200	EXISTING TOPOGRAPHIC CONTOURS (2' INTERVALS) (FROM AERIAL SURVEY - SEE GENERAL NOTE 1a)
200	APPROX. POND BOTTOM CONTOURS (2' INTERVALS) (SEE GENERAL NOTE 1c)
	EXISTING UNPAVED ROAD
	EXISTING RAILROAD
4 4	WETLANDS
	CREEK/STREAM CENTERLINE
RPA	LIMITS OF RIPARIAN PROTECTION AREA (PER FLUVANNA COUNTY ORDINANCE)
	APPROXIMATE EDGE OF SURFACE WATER
	LIMITS OF 100-YR FLOOD PLAIN
~~~~~~~	BASE FLOOD ELEVATION (100-YEAR, SEE NOTE 4)
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	EXISTING TREE LINE
	EXISTING FENCE
	EXISTING OVERHEAD UTILITY LINE
UGE	EXISTING UNDERGROUND ELECTRIC LINE
GAS	EXISTING UNDERGROUND GAS LINE
A MW-22	EXISTING MONITORING WELL LOCATION AND IDENTIFICATION (CCR RULE)
MW-5 (OW)	EXISTING OBSERVATION WELL LOCATION AND IDENTIFICATION
⊕ NZ-02	EXISTING PIEZOMETER AND IDENTIFICATION
o MH	EXISTING MANHOLE

- EXISTING CONDITIONS COMPILED FROM:

 AERIAL TOPOGRAPHIC SURVEY PREPARED BY McKENZIE SNYDER, INC., DATE OF AERIAL PHOTO: 1/16/15 [CONTROL PREPARED BY HAB SURVEYING & MAPPING (H&B)]

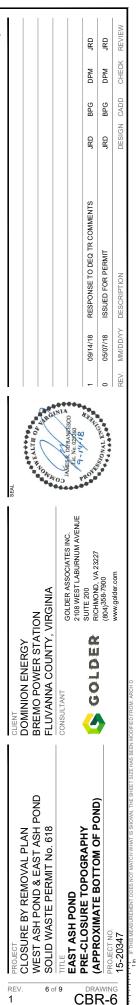
 - H&B SURVEYING & MAPPING (H&B)] b. BOUNDARY SURVEY PREPARED BY H&B SURVEYING AND MAPPING, LLC DATED 04/27/15. c. TOPOGRAPHY WITHIN THE LIMITS OF THE EAST ASH POND BASED ON THE APPROXIMATE POND BOTTOM PER HISTORICAL INFORMATION.

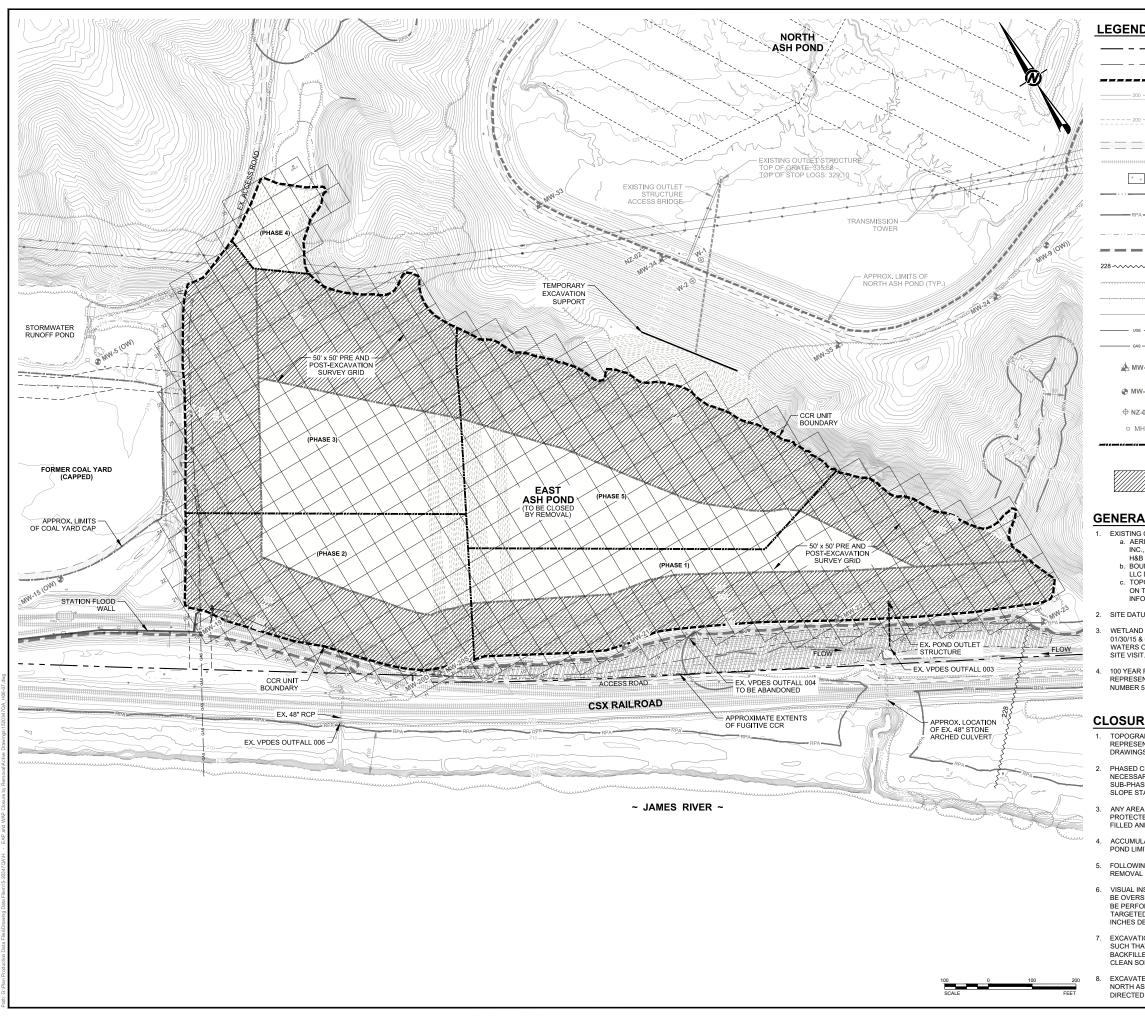
2. SITE DATUM: NAD83 / NAVD88

WETLAND DELINEATION BY DOMINION ENVIRONMENTAL SERVICES ON 01/30/15 & 02/05/15 AND BY GOLDER ASSOCIATES ON 03/16/15 & 03/25/15. WATERS OF THE U.S. CONFIRMED BY THE USACE DURING JUNE 4, 2015 SITE VISIT.

100 YEAR FLOOD PLAIN DELINEATION BASED ON FLOOD ELEVATION DATA REPRESENTED ON FEMA FLOOD INSURANCE RATE MAP (FIRM), MAP NUMBER 51065C0260C, EFFECTIVE DATE: 05/16/2008.

THE MAJORITY OF WATER AND ASH HAS BEEN REMOVED FROM THE EAST ASH POND, AND ASH REMOVAL ACTIVITIES ARE ONGOING.





END								IEW
	DOMINION PROPERTY BOUNDARY					JRD	JRD	REVIEW
	ADJACENT PROPERTY BOUNDARY					_	_	СK
	CCR UNIT BOUNDARY					DPM	DPM	CHECK
200	EXISTING TOPOGRAPHIC CONTOURS (2' INTERVALS) (FROM AERIAL SURVEY - SEE GENERAL NOTE 1a)					BPG	BPG	CADD
_ 200	APPROX. POND BOTTOM CONTOURS (2' INTERVALS) (SEE GENERAL NOTE 1c)							DESIGN C
	EXISTING UNPAVED ROAD					ЛRD	ЪЪ	DESI
	EXISTING RAILROAD							
a a	WETLANDS							
	CREEK/STREAM CENTERLINE							
RPA	LIMITS OF RIPARIAN PROTECTION AREA (PER FLUVANNA COUNTY ORDINANCE)					RESPONSE TO DEQ TR COMMENTS		
	APPROXIMATE EDGE OF SURFACE WATER					COMI		
	LIMITS OF 100-YR FLOOD PLAIN					D TR	E	
~~~~~~~	BASE FLOOD ELEVATION (100-YEAR, SEE NOTE 4)					DEC	ISSUED FOR PERMIT	
	EXISTING TREE LINE					SE T(	ORF	TION
	EXISTING FENCE					PON	ED	DESCRIPTION
	EXISTING OVERHEAD UTILITY LINE					RES	ISSI	DES
- UGE	EXISTING UNDERGROUND ELECTRIC LINE							ž
— GAS ———	EXISTING UNDERGROUND GAS LINE					09/14/18	05/07/18	YY/DD/MM
MW-22	EXISTING MONITORING WELL LOCATION AND IDENTIFICATION (CCR RULE)					60	05	
• MW-5 (OW)	EXISTING OBSERVATION WELL LOCATION AND IDENTIFICATION	1				<del></del>	0	REV
♦ NZ-02	EXISTING PIEZOMETER AND IDENTIFICATION		9	GINL				
D MH	EXISTING MANHOLE		4	pr.	VCESO 160	N.	2	
السريز ارتسب ارتز است ارتز است	APPROXIMATE CLEAN CLOSURE PHASE LIMITS (SUBJECT TO CHANGE BASED ON FIELD CONDITIONS DURING EXCAVATION AND MAY INCLUDE SUB-PHASES)		HITYS	Ja	IC. No. 0252		STONAL E	
	DENOTES APPROXIMATE LIMITS OF CRITICAL AREAS SUBJECT TO BACKFILL FOR ACCESS AND SLOPE STABILITY	SEAL	4	COMWOOD COMMO	IAME	ROF		
RAL NOTE	S							
TING CONDITIONS C AERIAL TOPOGRAI INC., DATE OF AEF H&B SURVEYING &	OMPILED FROM: PHIC SURVEY PREPARED BY McKENZIE SNYDER, RIAL PHOTO: 1/16/15 [CONTROL PREPARED BY MAPPING (H&B)] Y PREPARED BY H&B SURVEYING AND MAPPING,				OCIATES INC. ABURNUM AVENUE	10 23227		ш

LLC DATED 04/27/15.
 C. TOPOGRAPHY WITHIN THE LIMITS OF THE EAST ASH POND BASED ON THE APPROXIMATE POND BOTTOM PER HISTORICAL

INFORMATION.

SITE DATUM: NAD83 / NAVD88

WETLAND DELINEATION BY DOMINION ENVIRONMENTAL SERVICES ON 01/30/15 & 02/05/15 AND BY GOLDER ASSOCIATES ON 03/16/15 & 03/25/15. WATERS OF THE U.S. CONFIRMED BY THE USACE DURING JUNE 4, 2015

100 YEAR FLOOD PLAIN DELINEATION BASED ON FLOOD ELEVATION DATA REPRESENTED ON FEMA FLOOD INSURANCE RATE MAP (FIRM), MAP NUMBER 51065C0260C, EFFECTIVE DATE: 05/16/2008

### **CLOSURE BY REMOVAL NOTES**

TOPOGRAPHY SHOWN WITHIN LIMITS OF THE EAST ASH POND REPRESENTS THE APPROXIMATE BOTTOM BASED ON HISTORIC DRAWINGS AND FIELD INFORMATION. FOR REFERENCE ONLY.

PHASED CLOSURE OF EAST ASH POND MAY BE SEQUENCED AS NECESSARY TO SUPPORT CONSTRUCTION AND MAY INCLUDE SUB-PHASES FOR REGULATORY APPROVAL TO SUPPORT ACCESS, SLOPE STABILITY, AND MINIMIZE CONTACT STORMWATER AREAS.

ANY AREA CERTIFIED AS ACHIEVING CLOSURE BY REMOVAL IS TO BE PROTECTED FROM CCR AND CONTACT STORMWATER, AND MAY BE FILLED AND/OR RESHAPED PRIOR TO ACHIEVING FINAL GRADES.

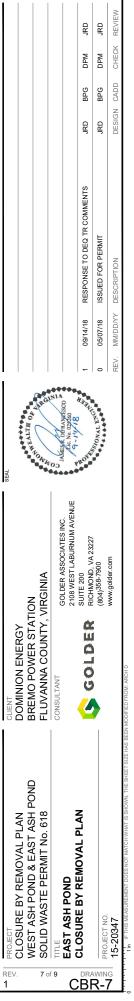
ACCUMULATED CCR SHALL BE REMOVED FROM SURFACES WITHIN THE POND LIMITS SUCH THAT NO CCR REMAINS VISIBLE

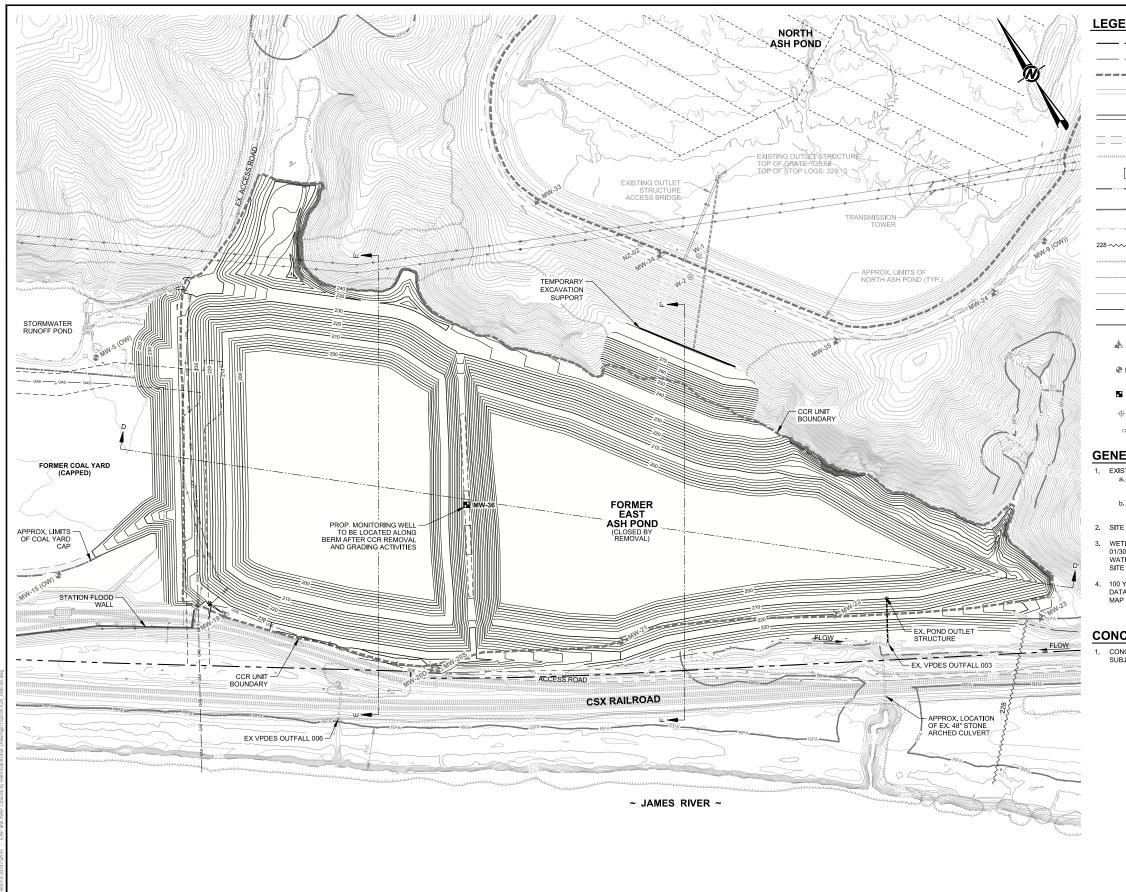
5. FOLLOWING VISUAL-CLEAN CONDITIONS, OVER-EXCAVATE THE REMOVAL FOOTPRINT BY AT LEAST SIX INCHES.

6. VISUAL INSPECTION AND TARGETED SUBGRADE VISUAL SAMPLING TO BE OVERSEEN BY OWNER'S ENGINEER REPRESENTATIVE. SAMPLING TO BE PERFORMED AT A FREQUENCY OF AT LEAST ONE TEST PER ACRE. TARGETED SAMPLING TO CONSIST OF HAND-DUG HOLES AT LEAST SIX INCHES DEEP.

7. EXCAVATION OF SLOPES STEEPER THAN 2:1 SHALL BE SEQUENCED SUCH THAT THE SLOPES CAN BE EXCAVATED. INSPECTED, AND BACKFILLED IN THE SHORTEST TIME POSSIBLE. BACKFILL SLOPES WITH CLEAN SOIL FILL AT NO STEEPER THAN 2:1.

EXCAVATED CCR AND SOIL-CCR MIXTURES SHALL BE CONSOLIDATED IN NORTH ASH POND OR TAKEN TO AN OFF-SITE DISPOSAL FACILITY AS DIRECTED BY DOMINION.





100 0 100 20 SCALE FEET

END	
	DOMINION PROPERTY BOUNDARY
	ADJACENT PROPERTY BOUNDARY
	CCR UNIT BOUNDARY
200	EXISTING TOPOGRAPHIC CONTOURS (2' INTERVALS) (FROM AERIAL SURVEY - SEE GENERAL NOTE 1a)
200	CONCEPTUAL FINAL GRADE CONTOURS (2' INTERVALS)
	EXISTING UNPAVED ROAD
	EXISTING RAILROAD
и "	WETLANDS
	CREEK/STREAM CENTERLINE
RPA	LIMITS OF RIPARIAN PROTECTION AREA (PER FLUVANNA COUNTY ORDINANCE)
	APPROXIMATE EDGE OF SURFACE WATER
~~~~~~	BASE FLOOD ELEVATION (100-YEAR, SEE NOTE 4)
	EXISTING TREE LINE
	EXISTING FENCE
	EXISTING OVERHEAD UTILITY LINE
— UGE ————	EXISTING UNDERGROUND ELECTRIC LINE
GAS	EXISTING UNDERGROUND GAS LINE
5 MW-22	EXISTING MONITORING WELL LOCATION AND IDENTIFICATION (CCR RULE)
9 MW-5 (OW)	EXISTING OBSERVATION WELL LOCATION AND IDENTIFICATION
MW-36	PROPOSED MONITORING WELL LOCATION AND IDENTIFICATION
♦ NZ-02	EXISTING PIEZOMETER AND IDENTIFICATION
o MH	EXISTING MANHOLE

GENERAL NOTES

EXISTING CONDITIONS COMPILED FROM:

 a. AERIAL TOPOGRAPHIC SURVEY PREPARED BY McKENZIE SNYDER, INC., DATE OF AERIAL PHOTO: 1/16/15 [CONTROL PREPARED BY H&B SURVEYING & MAPPING (H&B)]

 BOUNDARY SURVEY PREPARED BY H&B SURVEYING AND MAPPING, LLC DATED 04/27/15.

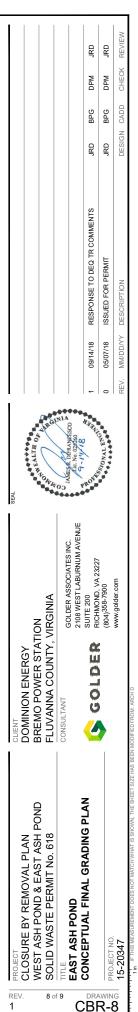
2. SITE DATUM: NAD83 / NAVD88

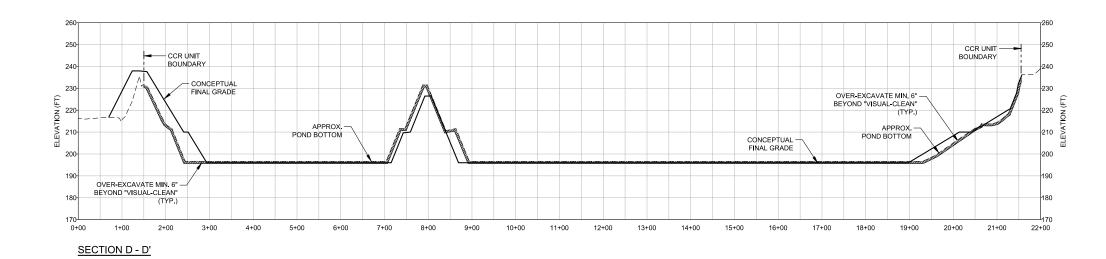
WETLAND DELINEATION BY DOMINION ENVIRONMENTAL SERVICES ON 01/30/15 & 02/05/15 AND BY GOLDER ASSOCIATES ON 03/16/15 & 03/25/15. WATERS OF THE U.S. CONFIRMED BY THE USACE DURING JUNE 4, 2015 SITE VISIT.

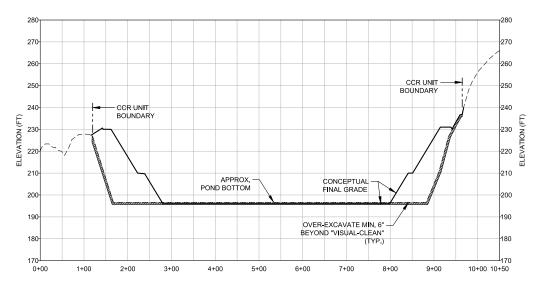
100 YEAR FLOOD PLAIN DELINEATION BASED ON FLOOD ELEVATION DATA REPRESENTED ON FEMA FLOOD INSURANCE RATE MAP (FIRM), MAP NUMBER 51065C0260C, EFFECTIVE DATE: 05/16/2008.

CONCEPTUAL FINAL GRADING NOTE

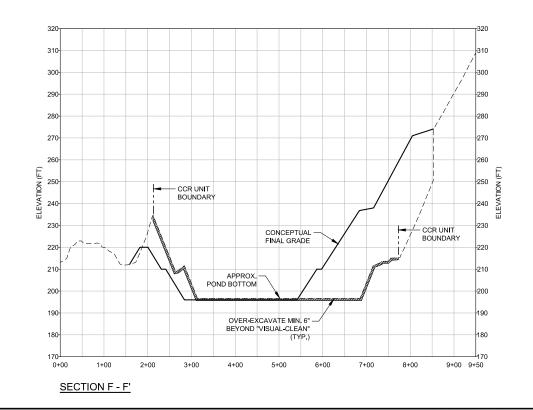
CONCEPTUAL FINAL GRADING IS SHOWN FOR REFERENCE ONLY AND IS SUBJECT TO CHANGE.

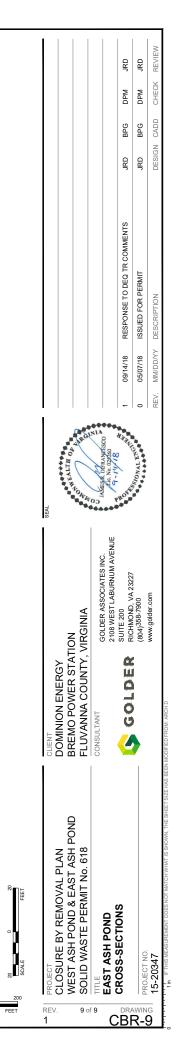












100 0 SCALE

ATTACHMENT 2

COST ESTIMATE (BY OTHERS)



Solid Waste Disposal Facility Cost Estimate Form

Facility Nam	ity Name: Bremo Power Station CCR Impoundments					Permit No. SWP 61		618			
Address:	1038 Brem	io Roa	d								
City: Bre	mo Bluff			State:	VA				Zip:	23022	
FA Holder:		Dom	inion Energy	Virginia							
Estimate Pre	pared By:	Gold	er Associates	i Inc.							
Indicate the	plan version	s for w	which this cos	t estimate wa	as prepared, ic	dentify	ing t	he followir	ng informat	ion for ea	ch plan:
Closure Pla	in		19 L. 3 M.	Services 1999	Post-Closu	re Car	re Pl	an			
Title:	Surface Im	pound	lment Closur	e Plan	Title:	r	n/a				
Plan Date:	September 2018		Approved:	June 2019	Plan Date:				Approved	l:	
Consultant:	Golder Ass	ociate	s Inc.		Consultant:						
Corrective	Action Plan	1			Corrective	Action	n Me	onitoring	Plan		(Adda)
Title:	n/a		(de el 20)		Title:	n	n/a				
Plan Date:		100	Approved:		Plan Date:				Approved	l:	
Consultant:					Consultant:						
Cost Estima	ite Summai	ry									
Total Closure	e Cost:			\$6,769,565							
Total Post-Closure Cost: \$10,34			\$10,342,500								
Total Correct		-	auto di campanya Salaya	\$0	nikeut.						
and the second	TOT	'AL:	\$	17,112,065							
References	and the second s		and the				- Angeler				
					nate: Unit cost						
estimates to	r Dominion's	CCR i	mpoundmen	t facilities, est	timates of soil	prices	in t	he coastal '	Virginia are	a, and oth	ner
lanofili closu	ге біб раска	ges in	the consulta	nt's local area							
Certificatio	n by Prena	rer:									
Sector Se			stimates per	aining to the	engineering fo	eature	san	d monitori	ng requirem	ents of t	his solid
waste manag	gement facili	ty hav	e been prepa	ared by me ar	nd are represe	ntative	e of t	the design	specified in	the facili	tv's
approved Clo	osure, Post-C	losure	and Correct	ive Action Pla	ns. The estim	ate is l	base	d on the co	ost of hiring	a third p	arty and
					zed by the sale						
					re. In my prof						
correct, and	complete re	preser	ntation of the	financial liab	ilities for closu	ure, po	ost-c	losure	, and correct	ctive actio	on of
of Virginia.	na comply w	ith the	e requiremen	ts of 9 VAC 20	0-70 and all ot	ther DE	eQ ri	iles and ste	futes of the	e Commo	nwealth
	DiFrancesco	DF		385.910	Signature:	$\left(-\right)$	1				
	cipal and Pr				Date:	42	31-	19/2	/		
Acknowled		-	And and Address of the Owner of		L	1	nt	4	New York		
	obert W. Sau		-/ operator		Signature:	11	10	AN	UL		
	e President S		Operations		Date:	Not	211	a la			
	and the second second	-				0	4	-7			

V. July 5, 2012



Bremo Power Station East Ash Pond Closure Estimate Worksheet



EXCa	vation components				
I.	Cover Removal		Calculation or Conversion	<u>1</u>	
a.	Quantity of cover removal	0yd3			
b.	Total cover removal unit cost	\$0.00 /yd3			
	Total Cover Removal Cost		a x b	\$0	
II.	Dewatering/Water Treatment/Testing Analysi	S			
a.	Duration of dewatering/treatment/testing	0 months			
b.	Total dewatering/treatment/testing unit cost	\$0.00 /month			
	Total Dewatering/Treatment/Testing Cost		a x b	\$0	
III.	CCR Removal/Disposal				
a.	Quantity of CCR removal	0 yd3			
b.	Total CCR removal unit cost	\$0.00/yd3			
с.	Total CCR off-site disposal unit cost	\$0.00 /ton			
	Total CCR Removal/Disposal Cost		a x (b + c)	\$0	
IV.	Overexcavation Removal/Disposal				
a.	Quantity of overexcavation removal	0 yd3			
b.	Total overexcavation removal unit cost	\$0.00/yd3			
с.	Total overexcavation off-site disposal unit cost	\$0.00 /ton			
	Total Overexcavation Cost	. <u></u> .	a x (b + (1.2c))	\$0	
		Excavation Co	omponent Subtotal (I	+ II + III + IV):	\$0
	ilization Components				
V.	Slope & Fill				
а.	Quantity of soil needed	80,000 yd3			
b.	Total soil unit cost	\$25.00/yd3	a v h	ć2 000 000	
	Total Slope Backfill Cost		a x b	\$2,000,000	
VI.	Vegetative Cover				
a.	Area to be vegetated	27 acres			
b.	Vegetative cover unit cost	\$3,250 /acre			
	Total Vegetative Cover Cost		a x b	\$87,750	
VII.	Erosion/Sediment Control				
a.	Duration of erosion/sediment control maintenance	6 months			
b.	Erosion/sediment control maintenance unit cost	\$5,000.00 /month			

Stabilization Component Subtotal (V + VI + VII): \$2,117,750

аxb

\$30,000

Total Silt Fence Removal and Disposal Cost



Miscellaneous Components

Misc	ellaneous Components			
VIII.	Groundwater Monitoring Well Installation			
a.	Quantity of wells needed	1		
b.	Well installation unit cost	\$50,000.00 /well		
	Total Groundwater Monitoring Well Installation Cost		a x b	\$50,000
IX.	Site Security			
Gate d	or Barrier			
a.	Number of gates required	1		
b.	Gate unit cost	\$1,500.00/gate		
С.	Subtotal gate cost		a x b	\$1,500
Closed	l Sign			
d.	Number of signs required	1		
e.	Sign unit cost	\$1,250.00 /sign		
f.	Subtotal sign cost		d x e	\$1,250
	Total site security cost		c + f	\$2,750
Х.	Mobilization / Demobilization			
a.	Cost for mobilization/demobilization	\$265,000		
	Total mobilization/demobilization cost		TCC x 0.10	\$265,000

Miscellaneous Component Subtotal (VIII + IX + X): \$317,750

Closure Cost Subtotal (CCS):	(I + + X)	\$2,435,500
Contingency (10%):	CCS x 0.10	\$243,550
Engineering & Documentation: Construction QA/QC Construction Engineering/Surveying/Permitting Total Engineering & Documentation Costs		\$200,000 \$60,000 \$260,000
Total Closure Cost (TCC):	CCS + Contingency + Engineering	\$2,939,050



Bremo Power Station East Ash Pond Post-Removal Estimate Worksheet

I.	Groundwater Monitoring		Calculation or Conversion		
a.	Total number of monitoring wells	10 wells			
b.	Total number of sampling events/year	2 events/yr	a x b	20	samples/yr
с.	Quantity of additional samples (e.g. QA/QC)	2 samples/event	b x c	4	samples/yr
d.	Total samples per year		b + c	24	samples/yr
e.	Analysis unit cost (Table 3.1 constituents)	\$1,250.00 /sample			
f.	Total Analysis cost		d x e	\$30,000.00	/yr
g.	GW Monitoring unit cost	\$6,500.00/event			-
i.	Total sampling cost	·	f + (g x b)	\$43,000.00	/yr
j.	Engineering fees & reports	\$5,000/yr			
	Yearly Groundwater Monitoring Cost		i + j	\$48,000	/yr
II.	Area Maintenance & Repair				
a.	Closure Area	27 acres			
Mow	ing & Fertilization				
b.	Mowing frequency	2 visits/yr			
с.	Mowing unit cost	\$500.00 /acre/visit			
d.	Total mowing cost		a x b x c	\$27,000	/yr
e.	Fertilizer frequency	1 visits/yr			
f.	Fertilizer unit cost	\$1,000.00 /acre/visit			
g.	Total fertilizer cost		a x e x f	\$27,000	/yr
	ion & Repair				
h.	Area to reseed/year		33% x a	9.0	acres
i.	Reseeding unit cost	\$1,200.00 /acre			
j.	Total reseeding cost		hxi	\$10,800.00	-
k.	Area of erosion/year		10% x a	2.7	acres
I.	Erosion repair unit cost	\$2,500.00 /acre			
	Mobilization/Demobilization	\$500.00/yr			
n.	Total cap erosion repair cost		(k x l) + m	\$7,250	/yr
	Yearly Area Maintenance & Repair cost		d + g + j + n	\$72,050	/yr
III.	BMP Maintenance & Repair				
a.	BMP cleanout frequency, 1 per	2 years	1/a	0.50	event/yr
b.	BMP cleanout unit cost	\$75,000 /event			
с.	Mobilization/Demobilization	\$2,500 /event			
	Yearly BMP Maintenance & Repair		a x (b + c)	\$38,750	/yr
IV.	General Inspections				
	General Inspection unit cost	\$2,000 /inspection			
b.	Number of inspections per year	2			
	Yearly General Inspection Cost		a x b	\$4,000	/yr



V .	Surface Water Monitoring	<u>Ca</u>	alculation or Conversion	
a.	Total number of monitoring locations	1 locations		
b.	Total number of sampling events/year	4 events/yr	a x b	4 samples/yr
c.	Quantity of additional samples (e.g. QA/QC)	0 samples/event	b x c	0 samples/yr
d.	Total samples per year		b + c	4 samples/yr
e.	Analysis unit cost	\$1,250.00 /sample		
f.	Total Analysis cost		d x e	<i>\$5,000.00</i> /yr
g.	Surface Water Monitoring unit cost	\$2,500.00 /event		
i.	Total sampling cost		f + (g x b)	<i>\$15,000.00</i> /yr
j.	Engineering fees & reports	\$5,450 /yr		
	Yearly Surface Water Monitoring Cost		i+j	\$20,450 /yr
	Annual Post-Removal Care Cost (APRCC)		l + + V	\$183,250 /yr
	Annual Post-Removal Care Cost (APRCC) Length of post-removal care (LPRC)	30 years	l + + V	\$183,250 /yr
		30 years	I + + V (APRCC x LPRC)	\$183,250 /yr \$5,497,500
	Length of post-removal care (LPRC)	30 years		



Bremo Power Station West Ash Pond Closure Estimate Worksheet

I.	vation Components				
	Cover Removal		Calculation or Conversion		
a.	Quantity of cover removal	0 yd3			
b.	Total cover removal unit cost	\$0.00/yd3			
	Total Cover Removal Cost		a x b	\$0	
II.	Dewatering/Water Treatment/Testing Analysis	·			
a.	Duration of dewatering/treatment/testing	1 months			
b.	Total dewatering/treatment/testing unit cost	\$2,000,000.00 /month			
	Total Dewatering/Treatment/Testing Cost		a x b	\$2,000,000	
III.	CCR Removal/Disposal				
a.	Quantity of CCR removal	0 yd3			
b.	Total CCR removal unit cost	\$0.00/yd3			
c.	Total CCR off-site disposal unit cost	\$0.00 /ton			
	Total CCR Removal/Disposal Cost		a x (b + c)	\$0	
IV.	Overexcavation Removal/Disposal				
a.	Quantity of overexcavation removal	14,000 yd3			
b.	Total overexcavation removal unit cost	\$20.00/yd3			
c.	Total overexcavation off-site disposal unit cost	\$100.00 /ton			
	Total Overexcavation Cost		a x (b + (1.2c))	\$282,400	
		Excavation Co	omponent Subtotal (I	+ II + III + IV):	
					\$2,282,400
	ilization Components			· · · · · · · · · · · · · · · · · · ·	\$2,282,400
V.	Slope & Fill			· · · · · · · · · · · · · · · · · · ·	\$2,282,400
V. a.	Slope & Fill Quantity of soil earthworks	80,000 yd3			\$2,282,400
V.	Slope & Fill	80,000 yd3 \$6.50 /yd3	axb	\$520,000	\$2,282,400
V. a. b.	Slope & Fill Quantity of soil earthworks Total soil earthworks unit cost Total Slope Backfill Cost				\$2,282,400
V. a. b. VI.	Slope & Fill Quantity of soil earthworks Total soil earthworks unit cost Total Slope Backfill Cost Vegetative Cover	\$6.50 /yd3			\$2,282,400
V. a. b. VI. a.	Slope & Fill Quantity of soil earthworks Total soil earthworks unit cost Total Slope Backfill Cost Vegetative Cover Area to be vegetated	\$6.50 /yd3			\$2,282,400
V. a. b. VI.	Slope & Fill Quantity of soil earthworks Total soil earthworks unit cost Total Slope Backfill Cost Vegetative Cover Area to be vegetated Vegetative cover unit cost	\$6.50 /yd3	a x b	\$520,000	\$2,282,400
V. a. b. VI. a.	Slope & Fill Quantity of soil earthworks Total soil earthworks unit cost Total Slope Backfill Cost Vegetative Cover Area to be vegetated	\$6.50 /yd3			\$2,282,400
V. a. b. VI. a.	Slope & Fill Quantity of soil earthworks Total soil earthworks unit cost Total Slope Backfill Cost Vegetative Cover Area to be vegetated Vegetative cover unit cost	\$6.50 /yd3 18 acres \$3,250 /acre	a x b	\$520,000	\$2,282,400
V. a. b. VI. a. b.	Slope & Fill Quantity of soil earthworks Total soil earthworks unit cost <i>Total Slope Backfill Cost</i> Vegetative Cover Area to be vegetated Vegetative cover unit cost <i>Total Vegetative Cover Cost</i>	\$6.50 /yd3	a x b	\$520,000	\$2,282,400
V. a. b. VI. a. b. VII.	Slope & Fill Quantity of soil earthworks Total soil earthworks unit cost Total Slope Backfill Cost Vegetative Cover Area to be vegetated Vegetative cover unit cost Total Vegetative Cover Cost Erosion/Sediment Control	\$6.50 /yd3 18 acres \$3,250 /acre	a x b	\$520,000	\$2,282,400

Stabilization Component Subtotal (V + VI + VII): \$608,500



Misc	ellaneous Components				
VIII.	Groundwater Monitoring Well Installation				
a.	Quantity of wells needed	1			
b.	Well installation unit cost	\$50,000.00 /well			
	Total Groundwater Monitoring Well Installation Cost		a x b	\$50,000	
IX.	Site Security				
Gate o	or Barrier				
a.	Number of gates required	1			
b.	Gate unit cost	\$1,500.00 /gate			
с.	Subtotal gate cost		a x b	\$1,500	
Close	d Sign				
d.	Number of signs required	1			
e.	Sign unit cost	\$1,250.00 /sign			
f.	Subtotal sign cost		d x e	\$1,250	
	Total site security cost		c + f	\$2,750	
X.	Mobilization / Demobilization				
a.	Cost for mobilization/demobilization	\$345,000			
	Total mobilization/demobilization cost		TCC x 0.10	\$345,000	
		Miscellaneous	Component Subtotal	(VIII + IX + X):	\$397,750
	Closure Cost Subtotal (CCS):		(I + + X)	\$3,288,650	
	Contingency (10%):		CCS x 0.10	\$328,865	
	Engineering & Documentation: Construction QA/QC Construction Engineering/Surveying/Permitting			\$170,000 \$43,000	

Closure Cost Subtotal (CCS):	(I + + X) \$3,288,6	50
Contingency (10%):	CCS x 0.10 \$328,8	65
Engineering & Documentation:		
Construction QA/QC	\$170,0	00
Construction Engineering/Surveying/Permitting	\$43,0	00
Total Engineering & Documentation Costs	\$213,00	00
Total Closure Cost (TCC):	CCS + Contingency + Engineering	\$3,830,515



Bremo Power Station West Ash Pond Post-Removal Estimate Worksheet

I.	Groundwater Monitoring		Calculation or Conversion		
a.	Total number of monitoring wells	11 wells			
b.	Total number of sampling events/year	2 events/yr	a x b	22	samples/yr
с.	Quantity of additional samples (e.g. QA/QC)	2 samples/event	b x c	4	samples/yr
d.	Total samples per year	,	b + c	26	samples/yr
e.	Analysis unit cost (Table 3.1 constituents)	\$1,250.00 /sample			
f.	Total Analysis cost		d x e	\$32,500.00	/yr
g.	GW Monitoring unit cost	\$7,250.00/event			
i.	Total sampling cost		f + (g x b)	\$47,000.00	/yr
j.	Engineering fees & reports	\$5,000/yr			
	Yearly Groundwater Monitoring Cost		i + j	\$52,000	/yr
II.	Area Maintenance & Repair				
a.	Closure Area	22 acres			
Mow	ing & Fertilization				
b.	Mowing frequency	2 visits/yr			
с.	Mowing unit cost	\$500.00 /acre/visit			
d.	Total mowing cost		a x b x c	\$22,000	/yr
e.	Fertilizer frequency	1 visits/yr			
f.	Fertilizer unit cost	\$1,000.00 /acre/visit			
g.	Total fertilizer cost		a x e x f	\$22,000	/yr
	ion & Repair				
h.	Area to reseed/year		33% x a	7.3	acres
i.	Reseeding unit cost	\$1,200.00 /acre			
j.	Total reseeding cost		hxi	\$8,800.00	-
k.	Area of erosion/year		10% x a	2.2	acres
I.	Erosion repair unit cost	\$2,500.00 /acre			
	Mobilization/Demobilization	\$500.00/yr			
n.	Total cap erosion repair cost		(k x l) + m	\$6,000	/yr
	Yearly Area Maintenance & Repair cost		d + g + j + n	\$58,800	/yr
III.	BMP Maintenance & Repair				
a.	BMP cleanout frequency, 1 per	2 years	1/a	0.50	event/yr
b.	BMP cleanout unit cost	\$50,000 /event			
с.	Mobilization/Demobilization	\$2,500 /event			
	Yearly BMP Maintenance & Repair		a x (b + c)	\$26,250	/yr
IV.	General Inspections				
a.	General Inspection unit cost	\$2,000 /inspection			
b.	Number of inspections per year	2			
	Yearly General Inspection Cost		a x b	\$4,000	/yr



V.	Surface Water Monitoring	<u>(</u>	Calculation or Conversion	
a.	Total number of monitoring locations	1 locations		
b.	Total number of sampling events/year	4 events/yr	a x b	4 samples/yr
с.	Quantity of additional samples (e.g. QA/QC)	0 samples/event	b x c	0 samples/yr
d.	Total samples per year		b + c	4 samples/yr
e.	Analysis unit cost	\$1,250.00 /sample		
f.	Total Analysis cost		d x e	<i>\$5,000.00</i> /yr
g.	Surface Water Monitoring unit cost	\$2,500.00/event		
i.	Total sampling cost		f + (g x b)	\$15,000.00 /yr
j.	Engineering fees & reports	\$5,450/yr		
	Yearly Surface Water Monitoring Cost		i+j	\$20,450 /yr
	, , , , , , , , , , , , , , , , , , , ,		i · j	<i>q</i> 2 0)100 / j1
	, , , ,)	<i>4</i> 20).00 / j.
	Annual Post-Removal Care Cost (APRCC)		I + + V	\$161,500 /yr
		<u>30</u> years	-	
	Annual Post-Removal Care Cost (APRCC)	30 years	-	
	Annual Post-Removal Care Cost (APRCC) Length of post-removal care (LPRC)	30 years	I + + V	\$161,500 /yr

ATTACHMENT 3

DEQ APPROVAL FOR EAP CCR REMOVAL COMPLETION



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Matthew J. Strickler Secretary of Natural Resources VALLEY REGIONAL OFFICE 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

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: Bremo 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 Bremo 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.
- Bremo 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

Mr. Dennis A. Slade, CHMM Bremo Bluff Power Station, SWP618 Closure by Removal Construction Report – East Ash Pond October 1, 2019; Page 2 of 2

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.

Sincerely,

Limmerman Je. rahend

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

ATTACHMENT 4

DEQ APPROVAL FOR WAP CCR REMOVAL COMPLETION



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Matthew J. Strickler Secretary of Natural Resources VALLEY REGIONAL OFFICE 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

David K. Paylor Director

Amy Thatcher Owens Regional Director

April 17, 2020

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

RE: Bremo 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 Bremo 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, 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

Mr. Dennis A. Slade, CHMM Bremo Bluff Power Station, SWP618 Closure by Removal Construction Report – West Ash Pond April 17, 2020; Page 2 of 2

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,

Limmerman Je. rahenf

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