

CCR Rule Semi-Annual Remedy Selection Progress Report

Chesterfield Power Station – Lower and Upper Ash Ponds Chester, Virginia October 14, 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 eleventh semi-annual remedy selection progress report for the Chesterfield Power Station Lower Ash Pond (LAP) and Upper Ash Pond (UAP) located in Chester, Virginia.

Assessments of corrective measures were initiated for the Lower Ash Pond on December 18, 2018, and for the Upper Ash Pond on January 30, 2019, 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 combined Assessment of Corrective Measures (ACM) Report for the Lower and Upper Ash Ponds was completed and placed in the unit's operating record on May 17, 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 Lower Ash Pond to eliminate fugitive dust, significantly reduce precipitation from infiltrating through the unit, and to prevent the generation of contact stormwater.
- 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 both the Lower and Upper Ash Ponds.
- Owner's engineer completed a geotechnical evaluation of the Lower and Upper Ash Ponds to determine extent and characteristics of CCR material to aid in removal sequencing.
- Submitted closure by removal solid waste permit application to the Virginia Department of Environmental Quality (DEQ) for approval which includes a detailed scope of work for removal of CCR materials and a water management plan.
- Excavation contractor selected and onsite studies were completed to support development of workplan and means and methods for material excavation and backfill.
- Beneficiation contractor completed construction of the CCR management and rail loading building for the transportation of CCR to be reused offsite.

- In May 2022, completed additional evaluations of groundwater and soil characteristics in and around the LAP and UAP to enhance conceptual site model.
- Construction of Phase II of the Fossil Fuel Combustion Products Management Facility (FFCPMF) completed and Certificate to Operate received on March 31, 2023 to receive source material from the LAP/UAP closures.
- Construction of a bentonite/cement/soil groundwater cutoff wall at the LAP commenced in July 2022 and was completed in late 2023. The cut-off wall is designed to limit the amount of groundwater and tidal influx into the pond during excavation assisting with both water management and safety with material excavation within the pond.
- LAP dewatering system remains in operation to remove pore water within and below the source material for treatment at the project's centralized wastewater treatment plant.
- Loadout pad constructed in LAP and CCR material transfer from the LAP to FFCPMF to support source removal is ongoing. Source material removal in Area 1 of 7 is substantially complete.
- Construction of the FFCPMF Phase 3 commenced in January 2024 and is anticipated to be operational Q1 2025.

Planned Activities

The following activities are planned:

- Construction of Phases III-IV of the FFCPMF to continue in advance of requiring capacity from the LAP closure.
- DEQ to issue draft Solid Waste Permit No. 619 for LAP/UAP closure.
- Excavation of LAP CCR and transfer to FFCPMF to continue.
- Beneficiation of material from UAP has resumed and tracks market entry availability.
- Complete the next semi-annual progress report no later than April 12, 2025.