Notification of Closure Completion

Low Volume Waste Setting Ponds A, B, C, and D

Virginia Electric and Power Company d/b/a Dominion Energy Virginia.

Mount Storm Power Station
436 Dominion Boulevard
Mount Storm, West Virginia 26739

October 5, 2023

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Section 1
Introduction

1.1 Site Information

Virginia Electric and Power Company d/b/a Dominion Energy Virginia (Dominion Energy) owns and operates the Mount Storm Power Station (Station). The Station is in Union District, Grant County, West Virginia at approximate latitude 39°12'2"N and longitude 79°15' 47'W. Topography is high on northwest side of ponds, sloping down toward Mount Storm Lake to the east and south. Normal water elevation for Mount Storm Lake is approximately 3,245 feet North American Vertical Datum of 1988 (NAVD88) with a full pool elevation of approximately 3,248.3 feet NAVD88.

The Station previously operated five low volume waste settling ponds (LWVSPs; Pyrite Pond and Ponds A, B, C, and D), which met the definition of coal combustion residual (CCR) surface impoundments under the United States Environmental Protection Agency (EPA) Title 40 of the Code of Federal Regulations (40 CFR), Part 257 (CCR Rule) for Disposal of Coal Combustion Residuals from Electric Utilities. The Pyrite Pond was retrofitted while Ponds A, B, C, and D were closed by removal of CCR in compliance with the CCR rule.

1.2 Purpose

This notification of closure was prepared for Dominion Energy by TRC Environmental Corporation (TRC) and serves to document that Ponds A, B, C, and D were closed in compliance with the EPA CCR Rule. TRC has prepared this report for Dominion Energy to specifically meet the closure by removal certification requirements in 40 CFR 257.102(c) for ponds A, B, C, and D.

Criteria for closure by removal can be found in 40 CFR 257.102(c) which states:

> *An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in appendix IV to this part.*

Section 2
Closure by Removal of CCR

In accordance with the Closure Plan and 40 CFR 257.102(c), Dominion Energy completed removal of CCR within the LVWSPs and decontamination of the LVWSPs. All closure activities were completed within five years of commencing closure construction, per 40 CFR 257.102(f)(1)(ii), and included dewatering, excavation, decontamination, outfall decommissioning, and inlet modification. The closure by removal is summarized below. Detailed information is provided in the Construction Documentation Report dated November 2019 prepared by TRC and contained in the Operating Record.

2.1 Existing LVWSP CCR Removal

All visible CCR and CCR-impacted subsoils (CCR materials) were removed from each pond through various means and methods. Removal activities commenced with isolating Ponds B and C from Station operations while Ponds A and D remained in service for Station operations. A description of removal activities is summarized below.

2.1.1 Ponds B and C

In April 2017, materials were removed from Ponds B and C. The CCR material was solidified and excavated using a front-end loader, long-stick excavators, and dozers. Once most of the CCR material was removed from Pond C, the existing outfall structure was removed along with the outfall piping up to the existing Pond C/D effluent junction box. A long reach excavator was used to remove any visible signs of CCR-impacted material and subsoils. All CCR and impacted subsoils were disposed of at the Station's on-site Phase B permitted landfill. Once CCR-impacted subsoils on the top and side slopes of the berm between Ponds B and C were removed and subsequently disposed of at the on-site landfill, the remaining suitable subsoils were excavated and hauled to a borrow area located approximately 0.5 miles south of the LVWSPs (Borrow Area C). Once the excavation was completed, the area was visually inspected by the TRC CQA professional engineer, or his representative, and verified visually free of CCR materials.

Pond B dewatering began when approximately 50 percent of the CCR materials from Pond C were removed. CCR material removal for Pond B followed the same methods of solidification and disposal as used for Pond C and verified as visually free of CCR material by the TRC CQA professional engineer or his representative.

2.1.2 Ponds A and D

In 2017, Pond A was the only primary LVWSP available during the construction of one of the new ponds and held the largest volume of CCR material. A hydraulic dredge was placed in Pond A to ensure adequate operating volume was maintained throughout construction of the new pond.

In May 2018, the hydraulic dredge was used to remove bulk CCR materials in Pond A. The dredged material was pumped into geotubes and staged on a temporary high-density polyethylene-lined dewatering pad. The full geotubes were allowed to dewater, and the contents were disposed of at the Station's on-site Phase B permitted landfill. The hydraulic dredge was also used to pump down the water level in Pond A prior to performing mechanical CCR material removal.

Pond A followed similar procedures to Ponds B and C prior to closing. Once dewatered, the remaining CCR material was mechanically removed using a long reach excavator to remove any visible signs of CCR-impacted material following the bulk CCR material removal.

CCR-impacted subsoils on the top and south side slope of the old berm between Ponds A and B were removed and disposed of at the Station's Phase B permitted landfill. The remaining suitable subsoils were excavated and hauled to Borrow Area C. Once the excavation was completed, the area was visually inspected by the TRC CQA professional engineer, or his representative, and verified visually free of CCR materials.

Pond D dewatering began when approximately 50 percent of the CCR materials from Pond A were removed. CCR material removal for Pond D followed the same methods of solidification and disposal as used for Pond B and C. Once CCR material was removed from Pond D, it was backfilled with general clean fill meeting the project specifications. Once the excavation was completed, the area was visually inspected by the TRC CQA professional engineer, or his representative, and verified visually free of CCR materials.

Closure by removal construction was determined to be complete for Ponds A, B, C, and D on December 20, 2018.

Section 3
Groundwater Monitoring Concentration Analysis

In October 2017, TRC certified the CCR rule groundwater monitoring network for the LVWSPs pursuant to 40 CFR 257.91. Subsequently in March 2018, the initial Assessment Monitoring Program (AMP) compliance sampling event was conducted, pursuant to 40 CFR 257.95(b). Groundwater protection standards for detected constituents in Appendix IV of Part 257 were established in October 2018, pursuant to 40 CFR 257.95(d)(2).

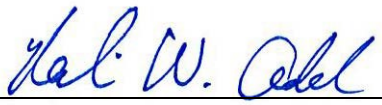
Per 40 CFR 257.102(c), closure by removal is considered complete when constituent concentrations throughout the CCR unit and any affected areas have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard for Appendix IV parameters. CCR removal and decontamination activities for the former LVWSP units were completed on December 20, 2018. Following closure construction completion, the groundwater sampling results obtained on August 19, 2019, did not indicate statistically significant levels above the groundwater protection standards for Appendix IV parameters.

Therefore, the performance standard for closure by removal in 40 CFR 257.102(c) is considered fulfilled as of August 19, 2019.

Section 4
Closure by Removal Certification

I, the undersigned WV Professional Engineer, hereby certify that I am familiar with the technical requirements of 40 CFR 257.102. I also certify that it is my professional opinion that, to the best of my knowledge, information, and belief, that the activities for Ponds A, B, C, and D outlined in the Closure Plan for Low Volume Waste Settling Pond have been completed in accordance with current good and accepted construction and engineering practice(s) and standard(s) appropriate to the nature of the project and the CCR removal requirements of 40 CFR 257.102(c).

For the purpose of this document, "certify" and "certification" shall be interpreted and construed to be a "statement of professional opinion". The certification is understood and intended to be an expression of my professional opinion as a WV Registered Professional Engineer, based upon knowledge, information, and belief. The statement(s) of professional opinion are not and shall not be interpreted or construed to be a guarantee or a warranty of the closure activities.

Nakia W. Addison, P.E.	21526
Printed Name of Professional Engineer	State of West Virginia License Number
	October 5, 2023
Signature of Professional Engineer	Date

Section 5
References

Golder, 2020. 2019 CCR Annual Groundwater Monitoring and Corrective Action Report, Low Volume Waste Settling Ponds, Mount Storm Power Station, Mount Storm, West Virginia.