

### Closure Plan for Low Volume Waste Settling Ponds

Mount Storm Power Station Mount Storm, West Virginia

June 2021

Prepared For Virginia Electric and Power Company

Nakia W. Addison, P.E.

Senior Engineer

TRC Environmental Corporation | Virginia Electric and Power Company Closure Plan for Low Volume Waste Settling Ponds Mt. Storm Power Station, Mount Storm, West Virginia Final

\\greenville-fp1\WPGVL\PJT2\230765\0004\R2307650004-0017 - Mt Storm Closure Plan.docx

### **Table of Contents**

Section 1 I	Introduction	1
1.1	Regulatory Background	1
1.2	Site Information	1
Section 2 0	Closure Plan	2
2.1	Closure Description	2
2.2	Closure Timeframe	2
2.3	CCR Removal Volume and Area Estimate	3
2.4	Notifications	3
Section 3 (	Certification	4
List of Tab	bles	
Table 1 Clo	osure Construction Summary	3

# Section 1 Introduction

Virginia Electric and Power Company d/b/a Dominion Virginia Power (Dominion) owns and operates the Mount Storm Power Station (Station). The Station operates three low volume waste settling ponds (LVWSP) (Pyrite Pond and Ponds A and B), which meet the definition of coal combustion residual (CCR) surface impoundments under the United States Environmental Protection Agency (USEPA) Disposal of Coal Combustion Residuals From Electric Utilities Final Rule (CCR Rule). This Closure Plan (Plan) describes the activities associated with the closure of the LVWSPs to meet the requirements of 40 Code of Federal Regulations (CFR) 257.102(b) in the CCR rule. This Plan was prepared for Dominion by TRC Environmental Corporation (TRC).

#### 1.1 Regulatory Background

The newly constructed Ponds A and B and the retrofitted Pyrite Pond are regulated through the Station's West Virginia Department of Environmental Protection (DEP) National Pollutant Discharge Elimination System (NPDES) permit.

The LVWSPs receive wash water and stormwater that contain CCR materials from the Station's fly and bottom ash management areas and are therefore subject to the CCR rule requirements. The Pyrite Pond is designed to be connected by piping and valving to the LVWSPs. As such, we have included the Pyrite Pond as a CCR surface impoundment based on this potential.

#### 1.2 Site Information

The Station is located in Union District, Grant County, West Virginia. The station is located at approximate latitude 39°12′2″N, longitude 79°15′47′W. The area surrounding the LVWSP is approximately 9 acres with ground surface elevations ranging from 3300 feet North American Vertical Datum 1988 (NAVD88) to 3245 feet NAVD88. The topography is high on the northwest side of the LVWSP sloping down toward Mount Storm Lake to the east and south. The berm elevations of the LVWSP range from 3254 feet NAVD88 to 3274 feet NAVD88. The normal water elevation for Mount Storm Lake is approximately 3245 feet NAVD88 with a maximum elevation of 3248.3 feet NAVD88.

# Section 2 Closure Plan

#### 2.1 Closure Description

The newly constructed Ponds A and B and the retrofitted Pyrite Pond will be closed in accordance with 40 CFR 257.102(c) through the removal of CCR such that no residual materials remain visible and decontamination of the area and continued monitoring of the groundwater monitoring network. Certification of the closure will be provided by a West Virginia registered professional engineer. Closure will commence once the LVWSPs are no longer needed for plant operations and is described below.

Flows will be diverted or will cease to the LVWSPs. The Ponds will be dewatered and closed through the removal of CCR materials. CCR will be mechanically dredged or excavated and will be disposed at Dominion's on-site permitted landfill. Following completion of CCR material removal operations, the LVWSPs' liner system components and liner protection materials (consisting of concrete, fabriform, geotextile, HDPE geomembrane, and GCL) will be demolished and disposed of at an off-site permitted disposal facility. The groundwater gradient control system under Ponds A and B will also be removed and disposed of offsite. Additionally, subsurface soils will be evaluated per the requirements of 40 CFR 257.102(c). Finally, all structures and equipment (*i.e.*, pumps, vaults, piping, etc.) will be decommissioned and dispositioned at an off-site permitted disposal facility or repurposed as appropriate. After closure, the area will be backfilled with earthen fill to an elevation compatible with the adjacent existing grades and subsequently stabilized with natural vegetation.

#### 2.2 Closure Timeframe

At this time, there is no timeline for closure of the LVWSPs. CCR is periodically excavated from the LVWSPs, as necessary and placed in the on-site CCR landfill. Closure will begin within 30 days of receiving the known final receipt of waste or removing the known final volume of CCR from the LVWSPs for beneficial reuse. The table below provides estimated major milestone timeframes of closure activities.

Table 1
Closure Construction Summary

MILESTONE	APPROXIMATE ANTICIPATED START DATE	APPROXIMATE ANTICIPATED END DATE
Dewater LVWSPs	Month 1	Month 3
Remove CCR and CCR unit structures from LVWSPs	Month 4	Month 13
Backfill LVWSPs and implement stabilization and site grading	Month 6	Month 15
Completion of construction activities	N/A	Month 16

#### 2.3 CCR Removal Volume and Area Estimate

It is estimated that a maximum of 88,000 cubic yards (CY) of CCR material will be removed from Ponds A and B and the Pyrite Pond during closure activities. This material will be excavated from an area of approximately 6 acres. In total, approximately 7 acres will be affected by the closure operation.

#### 2.4 Notifications

In accordance with the CCR Rule (40 CFR 257.102(g)), Dominion will add an Intent to Initiate Closure notice to the Station's operating record prior to initiating closure activities. In addition, a Notification of Completion of Closure with an engineer's certification will be posted to the operating record within 30 days of completion of closure activities (40 CFR 257.102(h)). The Plan and notifications will also be posted to Dominion's publicly accessible internet site, and notice provided to the WV Department of Environmental Protection.

# Section 3 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 outlined in this closure plan are in accordance with current good and accepted engineering practice(s) and standard(s) appropriate to the nature of the project and the technical 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

Printed Name of Professional Engineer

Signature of Professional Engineer

21526

State of West Virginia License Number

June 14, 2021

Date

