

CCR Rule Semi-Annual Remedy Selection Progress Report

Possum Point Power Station – Pond D Dumfries, Virginia November 22, 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 a 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 Possum Point Power Station Pond D located in Dumfries, Virginia.

A corrective measures assessment was initiated for Pond D on January 29, 2019, in response to groundwater protection standard exceedances in one or more downgradient groundwater monitoring wells. Pursuant to 40 CFR §257.96, an Assessment of Corrective Measures (ACM) Report and associated ACM Field Investigation Report were completed and placed in the unit's operating record on June 28, 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:

- In June 2019, the Virginia Department of Environmental Quality (DEQ) issued Solid Waste Facility Permit No. 617, which includes requirements for groundwater and surface water monitoring for Pond D. The solid waste permit requires additional monitoring beyond the requirements of the CCR Rule including monitoring of additional constituents in groundwater, additional monitoring wells, and the monitoring of surface water downgradient of the unit. The additional monitoring requirements will further refine the nature and extent of groundwater impacts;
- In April 2020, the DEQ approved Groundwater Protection Standards (GPS) for CCR Rule Appendix IV and additional constituents at Pond D under the solid waste permit. Therefore, semi-annual groundwater monitoring data is now also compared to the DEQ approved GPS;
- Completed an ACM addendum in October 2020 to include additional constituents identified at concentrations above the Virginia Solid Waste Permit GPS;
- 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 Pond D;
- Owner's engineer has performed a geotechnical evaluation of Pond D to determine extent and characteristics of CCR material to aid in removal sequencing;
- In March 2022, completed additional evaluations of groundwater and soil characteristics in and around Pond D to enhance conceptual site model;

- Submitted the Part A Solid Waste Permit Application to DEQ on October 26, 2022, for the siting of a landfill adjacent to Pond D for the removal and long-term storage of Pond D material. DEQ provided an administrative completeness letter on March 31, 2023, and conditional approval on May 17, 2024;
- Held a public meeting on November 2, 2022, to discuss the results of the corrective measures assessment; and
- Revised the Assessment of Corrective Measures Report to include updated site information and to respond to DEQ comment. The revised report was placed in the operating record on October 18, 2024.

Planned Activities

The following activities are planned:

- In coordination with owner's engineer, develop a detailed scope of work for the removal of the CCR materials including a water management plan during the CCR removal;
- Submit a modification request to DEQ to amend SWP 617 for the closure of Pond D;
- Submit a Virginia Part B Solid Waste Permit Application for design and construction of a CCR landfill for the long-term storage of Pond D CCR material;
- Continue to comply with DEQ solid waste corrective action program process for selection of final remedy; and
- The next semi-annual progress report will be completed no later than May 21, 2025.