

CCR Rule Semi-Annual Remedy Selection Progress Report

Possum Point Power Station – Pond D Dumfries, Virginia December 16, 2020

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 third 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:

- 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. The first 2020 semi-annual groundwater monitoring event detected concentrations of boron, cobalt, lithium, and nickel at concentrations above GPS;
- Completed an ACM addendum 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 Virginia Senate Bill 1355, 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;
- Owners engineer has performed a geotechnical evaluation of Pond D to determine extent and characteristics of CCR material to aid in removal sequencing; and

- Awarded a contract for consultant engineers to conduct studies of the geochemical environment and natural recovery capacities of the uppermost aquifer beneath the pond.

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 ash removal;
- Continue evaluation of groundwater and soil characteristics in and around Pond D to enhance conceptual site model; and
- The next semi-annual progress report will be completed no later than June 14, 2021.