



CCR Rule Groundwater Protection Standard Exceedance Notification

Possum Point Power Station – Pond E Dumfries, Virginia

The 2020 first semi-annual assessment monitoring groundwater samples were collected from the Possum Point Power Station Pond E's groundwater monitoring network in accordance with the federal Coal Combustion Residuals (CCR) Rule. The analytical results from this sampling event were compared to applicable groundwater protection standards (GWPS) and constituent concentrations above GWPS were identified.

40 CFR §257.95(g) requires the owner or operator of an existing CCR unit that is monitoring groundwater in accordance with the assessment monitoring program and has exceeded a GWPS to prepare a notification identifying the Appendix IV constituents that have exceeded the GWPS. The notification is complete when it is placed in the facility's operating record as required by 40 CFR §257.105(h)(8). The following Appendix IV constituent was detected at levels above the GWPS.

CCR Rule Groundwater Protection Standard Exceedances

Constituent	GWPS (parts per billion)	Downgradient Monitoring Well(s)	Concentration (parts per billion)
Cobalt	6	ES-3D	36.8
		ES-1609	23.9
		ES-1613	6.4
		T-1615S	22.2

The Commonwealth of Virginia adopted by reference the October 4, 2016 version of the federal CCR rule 40 CFR §257 into 9VAC20-81-800 of the Virginia Solid Waste Management Regulations. Amendments to 40 CFR §257 after October 4, 2016 were not incorporated into 9VAC20-81-800. As a result, health-based GWPSs adopted under the August 29, 2018 amendment to the federal CCR Rule are not applicable to 9VAC20-81-800. Under 9VAC20-81-800, the following Appendix IV constituent was detected in one or more downgradient wells above the Virginia CCR Rule GWPS.

Virginia CCR Rule Groundwater Protection Standard Exceedances

Constituent	GWPS (parts per billion)	Downgradient Monitoring Well(s)	Concentration (parts per billion)
Cobalt	5 ⁽¹⁾	ES-3D	36.8
		ES-1609	23.9
		ES-1613	6.4
		T-1615S	22.2

⁽¹⁾ = Values represent highest laboratory Quantitation Limit (QL) for the constituent based on background data. Future QL values are subject to change; however, GWPS cannot be less than the value listed.

An assessment of corrective measures was initiated on March 29, 2020, in response to 2019 second semi-annual GWPS exceedances and will include the constituent and wells listed in this notification. Per our approved solid waste permit, the pond has been excavated of all CCR material as acknowledged by the Virginia Department of Environmental Quality in August 2019.

Operating Record Placement Date: May 1, 2020