



Extension of Closure Timeframe for CCR Surface Impoundments

Date: December 14, 2021

Station: Possum Point Power Station

Unit: Ponds ABC

Pursuant to 40 C.F.R. § 257.102(f)(2), Virginia Electric and Power Company d/b/a Dominion Energy Virginia (Dominion) is providing this demonstration to extend the time necessary to close Ponds ABC at the Possum Point Power Station in Dumfries, Virginia. In November 2018, CCR material removal from Ponds ABC was substantially completed, followed by over-excavation of the subsurface by a minimum of 6 inches in conformance with the units' closure plan and Solid Waste Permit (SWP) 617. The Virginia Department of Environmental Quality (DEQ) provided verification of these activities in a letter dated August 30, 2019 (attached).

Closure is not considered complete, however, under 40 C.F.R. § 257.102(c), the units' closure plan, and SWP 617 due to current groundwater monitoring concentrations exceeding established unit-specific groundwater protection standards. Ponds ABC are presently working through the Corrective Action process required by the CCR Rule, the units' closure plan, and SWP 617.

As a practical matter, the units accomplished closure by removal of the CCR material in November 2018, which was verified by the DEQ in August 2019. However, the ponds are not considered "closed" under the CCR rule due to current groundwater conditions. Therefore, it is not feasible to complete closure of the CCR units within the required timeframe due to factors beyond the facility's control, and this demonstration documents the need to extend the timeframe for closure of Ponds ABC by two years as allowed under Section 257.102(f)(2).

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Owner/Operator Signature

A handwritten signature in black ink that reads "Jason Williams".

Jason E. Williams

Vice President, Environmental



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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August 30, 2019

Lisa Messinger
Director, Environmental Services
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VIA EMAIL: lisa.c.messinger@dominionenergy.com

**Re: Possum Point Power Station
Solid Waste Permit Number 617 (SWP 617)
Closure by Removal CQA Report, Ash Ponds ABC and E Review**

Dear Ms. Messinger:

The Virginia Department of Environmental Quality (DEQ) Northern Regional Office (NRO) is in receipt of a Construction Quality Assurance (CQA) Report detailing the abatement of the ash from ponds A, B, C, and E (Permit No. 617). Golder Associates Inc. prepared the report on behalf of Dominion Energy and details the removal process and visual inspections of abated areas. The report was received by DEQ on June 18, 2019.

The referenced submittal has been reviewed in accordance to the approved closure plan titled; *Possum Point Power Station, Inactive CCR Surface Impoundments Closure by Removal (SWP 617)*. Based on the site visits performed by the DEQ and from the review of the submittal, the current submittal appears to conform to the planned actions described within the closure plan.

It should be noted that this approval only applies to the specific documentation regarding the ash removal, and should not be applied to any other documentation except what is referenced within this memo. A copy of the CQA report and all record drawings must be retained in the operating record for Permit No. 617.

Please note that this letter should not be considered a legal opinion or a case decision as defined by the Administrative Process Act, Code of Virginia § 2.2-4000 *et seq.* If you have any questions

Lisa Messinger
Possum Point Power Station
Solid Waste Permit Number 617
CQA Report, Ash Ponds ABC and E Review

August 30, 2019
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regarding this correspondence, or require addition information, please contact me by telephone at 703-583-3841, or by e-mail at joseph.precise@deq.virginia.gov.

Respectfully,



Joseph E. Precise
Solid Waste Permit Writer

cc: Dennis Slade / Dominion (via email at dennis.a.slade@dominionenergy.com)
Richard Doucette / DEQ
Electronic Record