



## CCR Rule Groundwater Protection Standard Exceedance Notification

### Virginia City Hybrid Energy Center – Curley Hollow Solid Waste Management Facility Wise County, Virginia

The second semi-annual 2018 assessment monitoring groundwater samples were collected from the Virginia City Hybrid Energy Center Curley Hollow Solid Waste Management Facility'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 with the exception of one constituent (lithium), all results were below GWPS.

The wells in which this constituent was above GWPS are located inside the Virginia City Hybrid Energy Center property. Groundwater within the property and downgradient of the property is not used as drinking water and as such does not present a risk to drinking water quality. A successful Alternate Source Demonstration was completed in December 2018 and concluded that concentrations of the constituent are likely the result of naturally occurring (coal seam deposits) and anthropogenic (coal mining) sources in close proximity to and beneath the landfill and are not indicative of a release from the unit.

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 constituent was detected at levels above the GWPS.

#### CCR Rule Groundwater Protection Standard Exceedances

Constituent	Aquifer	GWPS (parts per billion)	Downgradient Monitoring Well(s)	Concentration (parts per billion)
Lithium	Kennedy Member	40	MW-4	42
			MW-5	51

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 constituent was detected in one or more downgradient wells above the Virginia CCR Rule GWPS.

#### Virginia CCR Rule Groundwater Protection Standard Exceedances

Constituent	Aquifer	GWPS (parts per billion)	Downgradient Monitoring Well(s)	Concentration (parts per billion)
Lithium	Kennedy Member	35	MW-4	42
			MW-5	51