



CCR Rule Groundwater Protection Standard Exceedance Notification

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

Until the last few years, coal had been the primary source of electric generation in Virginia and in the U.S. generally. As we now transition to the cleaner energy sources of the future we will continue to be responsible for managing coal ash to ensure a clean and safe environment for the communities we call home.

This notification provides groundwater sampling results for Virginia City Hybrid Energy Center. There are no impacts to drinking water or public health.

Dominion Energy takes these results very seriously. Any impact or potential impact to our environment has our full attention. We are committed to doing any clean-up necessary in accordance with all federal and state regulations, but more importantly we are committed to doing what is right.

Groundwater protection standards (GWPS) for the Virginia City Hybrid Energy Center Curley Hollow Solid Waste Management Facility (Landfill) were established in accordance with the federal Coal Combustion Residual (CCR) Rule on September 27, 2018. The CCR rule establishes the requirements for GWPS and measures to be taken to address groundwater conditions at ash impoundments and landfills. Groundwater samples were collected from the Landfill's groundwater monitoring network, which consists of seven (7) monitoring wells and analyzed for the twenty-one (21) required CCR constituents. The analytical results were then compared to GWPS. With the exception of one constituent in one of the facility's monitoring wells, all results were below the GWPS.

The well in which this constituent was above GWPS, monitoring well MW-5, is 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.

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Constituent	Aquifer	GWPS (parts per billion)	Downgradient Monitoring Well(s)	Concentration (parts per billion)
Lithium	Kennedy Member	40	MW-5	44.5

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 Virginia CCR impoundment rules (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. Even with the application of the more stringent background based Virginia CCR program, only one constituent in two wells was detected at a concentration above its Virginia CCR GWPS. As stated above, groundwater within the property and downgradient of the property is not used as drinking water and these concentrations do not represent a risk to human health or the environment.

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	35.6
			MW-5	44.5

Given the presence of coal seams within the area of the Landfill prior to construction, the facility intends to pursue an Alternate Source Demonstration to determine if the GWPS exceedance is a result of an alternate source, error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality.