



CCR Rule Groundwater Protection Standard Exceedance Notification

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

The first semi-annual 2019 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 constituent concentrations above GWPS were identified.

The wells in which these constituents were 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. Alternate Source Demonstrations were completed in December 2018 and April 2019 and concluded that concentrations of 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.

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Constituent	Aquifer	GWPS (parts per billion)	Downgradient Monitoring Well(s)	Concentration (parts per billion)
Lithium	Kennedy Member	40	MW-4	46
			MW-5	50

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 constituents were detected in one or more downgradient wells above the Virginia CCR Rule GWPS.

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Constituent	Aquifer	GWPS (parts per billion)	Downgradient Monitoring Well(s)	Concentration (parts per billion)
Cobalt	Jawbone Unit	4.0	MW-11	4.4
Lithium	Kennedy Unit	35	MW-4	46
			MW-5	50