

CCR Rule Groundwater Protection Standard Exceedance Notification

Yorktown Power Station – Industrial Landfill Yorktown, Virginia

The first semi-annual 2019 assessment monitoring groundwater samples were collected from the Yorktown Power Station Industrial Landfill'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 except for one constituent in one well (MW-2), all results were below GWPS.

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 constituents were detected at levels above GWPS.

| Constituent | GWPS | Downgradient | Concentration |
|-------------|---------------------|--------------------|---------------------|
| | (parts per billion) | Monitoring Well(s) | (parts per billion) |
| None | | | |

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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 | GWPS (parts per billion) | Downgradient Monitoring Well(s) | Concentration (parts per billion) |
|-------------|-----------------------------|------------------------------------|--------------------------------------|
| Molybdenum | 10 ⁽¹⁾ | MW-2 | 10.5 |

⁽¹⁾ = Value represents 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.

Successful Alternate Source Demonstrations were completed in December 2018 and April 2019 and concluded that monitoring well MW-2 appears to have a strong surface water connection due to the location of MW-2 near ponded surface water and shallow well construction and may not be suitable to monitor the uppermost aquifer for potential impacts from the landfill. Dominion Energy is evaluating the well and the monitoring network and will make changes as appropriate. Groundwater monitoring well MW-2 is located inside the Yorktown Power Station property and groundwater within the property and downgradient is not used as drinking water and as such does not present a risk to drinking water quality.