

SURFACE IMPOUNDMENT CLOSURE PLAN

Bremo Power Station – West and East Ash Ponds Permit #618

Submitted to:



Bremo Power Station

1038 Bremo Road Bremo Bluff, VA 23022

Submitted by:

Golder Associates Inc.

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Project # 152-0347

May 11, 2018 Revised September 2018

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1.0 PLAN CERTIFICATION

This Closure Plan for the Bremo Power Station's West Ash Pond (WAP) and East Ash Pond (EAP) was prepared by Golder Associates Inc. (Golder). The document and Certification/Statement of Professional Opinion are based on and limited to information that Golder has relied on from Dominion Energy and others, but not independently verified, as well as work products produced by Golder.

On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the Commonwealth of Virginia that this document has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances, at the same time, and in the same locale. It is my professional opinion that the document was prepared consistent with the requirements in §257.102 of the United States Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," published in the Federal Register on April 17, 2015, with an effective date of October 19, 2015 (40 CFR §257.102), as well as with the requirements in §257.100 resulting from the EPA's "Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Extension of Compliance Deadlines for Certain Inactive Surface Impoundments; Response to Partial Vacatur" published in the Federal Register on August 5, 2016 with an effective date of October 4, 2016 (40 CFR §257.100).

The use of the word "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion, and is not and shall not be interpreted or construed as a guarantee, warranty, or legal opinion.

Ron DiFrancesco, P. E.
Printed Name of Professional Engineer

JAMES R. DIFRANCESCO
Lic. No. 025260
9-19-18

025260

Commonwealth of Virginia License No.

Signature and Date



2.0 INTRODUCTION

This Closure Plan (Plan) was prepared for the Bremo Power Station's (Station) inactive Coal Combustion Residuals (CCR) surface impoundments, the West Ash Pond (WAP) and East Ash Pond (EAP). This Closure Plan was prepared in accordance with 40 CFR Part §257, Subpart D and is consistent with the requirements of 40 CFR §257.102 for closure of CCR surface impoundments, 40 CFR §257.100(e)(6)(i), and Virginia Solid Waste Management Regulations 9 VAC20-81-800. The Station, owned and operated by Virginia Electric and Power Company d/b/a Dominion Energy Virginia (Dominion), is located in Bremo Bluff, Virginia at 1038 Bremo Road, north of the James River.

The WAP and EAP are being closed as CCR surface impoundments under the CCR rule provisions at 40 CFR §257. The ponds will be closed by removal of CCR pursuant to 40 CFR §257.102(c). All elevations noted in this document, unless stated otherwise, are in feet relative to the North American Vertical Datum of 1988 (NAVD-88).

2.1 General Impoundment Information

2.1.1 West Ash Pond

The WAP is approximately 17 acres in size and was used as a water treatment pond to settle and manage low-volume wastewaters, including CCR. In 2014, the Station converted from a coal-fired power plant to a natural gas-fired power plant. No new CCR has been placed in the WAP after the conversion. The WAP contained approximately 327,000 cubic yards (CY) of CCR prior to the start of excavation activities.

The WAP is regulated under the following permits:

- Virginia Department of Environmental Quality (DEQ) Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VA0004138
- DEQ VPDES Construction General Permit No. VAR10H875
- Virginia Department of Conservation and Recreation (DCR) Operation and Maintenance Certificate, Inventory No. 06511

2.1.2 East Ash Pond

The EAP is an approximately 26.5-acre impoundment that was used for the storage of CCR from the Bremo Power Station. The pond was placed into service in the 1930's and was capped with soil fill in the mid-1980's except for the eastern portion of the pond, which remained wet, allowing pass-through of drainage from the adjacent area to the north. The EAP contained approximately 1,800,000 cubic yards (CY) of CCR prior to the start of excavation activities.



The EAP is regulated under the following permits:

- Virginia Department of Environmental Quality (DEQ) Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VA0004138
- DEQ VPDES Construction General Permit No. VAR10H875
- Virginia Department of Conservation and Recreation (DCR) Operation and Maintenance Certificate, Inventory No. 00815

3.0 CLOSURE IMPLEMENTATION

3.1 Overview of Closure Approach

This plan provides for the closure of the WAP and EAP by removal of the CCR material. Closure is considered complete under 40 CFR 257.102 and 9 VAC20-81-810 when:

- 1. A Professional Engineer licensed in the Commonwealth of Virginia certifies all CCR has been removed from the units followed by an over-excavation of approximately 6 inches of soil.
- 2. The unit's downgradient groundwater monitoring wells do not exhibit levels in excess of a maximum contaminant limit (MCL) or established groundwater protection standard for any CCR Appendix IV constituent after a minimum of ten sampling events have occurred after CCR material has been verified as removed by a professional engineer licensed in Virginia.

At the time of writing, the majority of CCR in the ponds has been relocated to the North Ash Pond (NAP). Final CCR removal will either be consolidated in the NAP, or disposed of in a designated off-site facility. After completing the removal of CCR from the WAP, the embankments will be stabilized and/or removed and the remaining former pond area will be re-graded and left as a grassy open area. After completing the removal of CCR from the EAP, the embankments will be stabilized and the area will be repurposed as the East Stormwater Management Pond. In addition, a discrete area of fugitive CCR has been identified along the southern portion of the EAP embankment. This area will be further characterized and the residual CCR will be removed as part of the EAP closure.

During and after closure, the existing network of groundwater monitoring wells will be sampled and tested to determine the monitored constituent concentrations required in 40 CFR §257 Appendix IV.

4.0 CLOSURE TIMEFRAMES

Table 1 below outlines the estimated sequence of scheduled closure activities.

Table 1: Closure Schedule

Activity	Tentative Date				
Completion of CCR Removal	By October 2018				
Completion of Closure Construction	By January 2019				
Certification of Construction Completion	By April 2019				



Closure is considered complete when the elements of this Closure Plan specified above have been performed, as certified by a Professional Engineer licensed in the Commonwealth of Virginia. This certification will be included as part of a closure certification report. In accordance with 40 CFR §257.102(h), Dominion will prepare a notification of closure of the CCR unit within 30 days of completion of closure, and place the notification in the operating record.

5.0 INVENTORY REMOVAL AND DISPOSAL

5.1 Waste Removal, Decontamination and Disposal

The protocol for closure by removal of materials within the EAP and WAP will involve removing accumulated CCR such that no residual materials remain visible, followed by over-excavating the removal footprint by approximately 6 inches. Removed CCR and CCR-mixed soil will either be consolidated in the NAP or taken to an off-site disposal facility. To facilitate stormwater management, construction, and/or structural stabilization of embankments or excavations, closure by removal of areas within the ponds may be achieved in phases. Phased closures may be sequenced as necessary to support traffic patterns, stormwater controls, etc.

Material removal against embankments may involve excavation of the upstream embankment face to a near-vertical condition. Immediately after excavation and inspection of these areas for certification, fill soil will be placed and compacted against the embankment to re-establish stable slopes of no steeper than 2 horizontal to 1 vertical (2H:1V). For rock, existing concrete designated to remain, or other similar hard surfaces (e.g. pipes or foundation supports to remain), the surface will be cleaned to a visually-clean condition through mechanical means such as pressure washing. The soils surrounding said hard areas will be removed to the 6-inch over-excavation criterion. After CCR removal and certification, the WAP will be graded to drain. Vegetative stabilization will be established to prevent erosion. The area will be maintained as a grassy open area. After CCR removal and certification in the EAP, the pond subgrade will be shaped and modifications will be made to the existing outlet structure. Vegetative stabilization will be established to prevent erosion.

5.2 Sampling and Testing Program

After removal of the 6-inch over-excavation material, the area will be visually inspected to verify the CCR and over-excavation has been achieved. The ponds will be further inspected by targeted soil cores for visual inspection to a depth of at least 6 inches at a frequency of at least one core per acre. The soil cores will be dug by hand, using a hand auger or similar tool, and be a minimum of 6-inches deep.

Verification surveys of the pond closure will be prepared by a Commonwealth of Virginia-licensed Land Surveyor and will consist of a survey of the "visually clean" surface and a survey of the "over-excavation"



surface to verify the minimum 6-inch removal. Certification of the closure by removal will be provided by a Commonwealth of Virginia-licensed Professional Engineer.

Groundwater monitoring will be conducted in accordance with the approved Groundwater Monitoring Plan to meet the closure by removal standard set forth in 40 CFR 257.102(c) and the Virginia Solid Waste Management Regulations.

5.3 Other Areas

During the evaluation of the nature and extent of CCRs in and around the EAP, a thin area of residual CCR material was identified along a portion of the toe of the East Pond embankment. Additional permits from the Corps of Engineers and Fluvanna County may be required to authorize removal of materials in this area, and Dominion will obtain all necessary permits prior to performing removal activities in this area. The identified materials will be removed to a visually clean condition and relocated to the North Pond. Verification and documentation of the removal will be provided by a Virginia-licensed Professional Engineer. After removal and verification, the vegetation in the area will be restored with equivalent vegetation as per the applicable permits.

6.0 CLOSURE OF SUPPORT PONDS AND BASINS

There are no supporting ponds or basins associated with the WAP or EAP.

7.0 CLOSURE IMPLEMENTATION

7.1 Posting

One sign will be posted at the site entrance to each pond notifying all persons of the final closure and prohibition against further receipt of CCR. Unauthorized access to the site will be controlled by natural barriers or lockable gates across the access roads.

7.2 Certification

Upon completion of closure construction, a certification statement signed by a licensed Professional Engineer will be placed in the operating record and submitted to the DEQ along with the documentation from the Sampling and Testing Program. The certification statement shall read as follows:

I certify that closure has been completed in accordance with the Closure Plan dated [DATE] for solid waste permit number 618 issued to Dominion, with the exception of the following discrepancies: [To Be Determined]

In addition, a sign(s) was (were) posted on [DATE] at the site entrance notifying all persons of the closing [and state other notification procedures if applicable] and



barriers [indicate type] were installed at [location] to prevent new waste from being deposited.

[Signature, date and stamp of Professional Engineer]

7.3 Post-Closure Uses

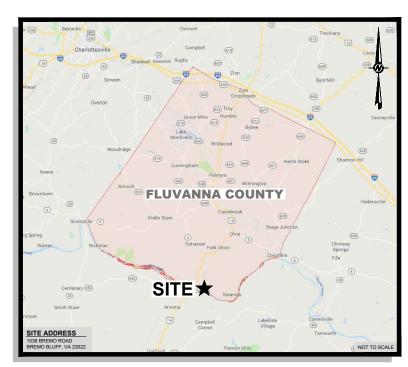
No post-closure use of the WAP area is proposed. The EAP will be repurposed as the East Stormwater Management Pond for stormwater and low volume wastewaters from the Station.

8.0 CLOSURE COST ESTIMATE

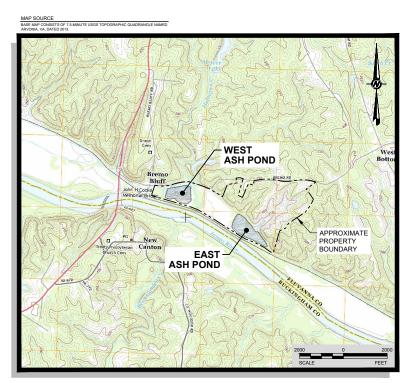
The closure cost estimate for the WAP and EAP is \$18,041,661. This estimated amount covers the remaining excavation, inspection, testing, and certification as proposed in this Plan.



BREMO POWER STATION CLOSURE BY REMOVAL PLAN WEST ASH POND & EAST ASH POND SOLID WASTE PERMIT No. 618 FLUVANNA COUNTY, VIRGINIA SEPTEMBER 2018



DRAWING INDEX									
DRAWING No.	DRAWING TITLE								
CBR-1	COVER SHEET								
CBR-2	WEST ASH POND PRE-CLOSURE TOPOGRAPHY (APPROXIMATE BOTTOM OF POND)								
CBR-3	WEST ASH POND CLOSURE BY REMOVAL PLAN								
CBR-4	WEST ASH POND CONCEPTUAL FINAL GRADING PLAN								
CBR-5	WEST ASH POND CROSS-SECTIONS								
CBR-6	EAST ASH POND PRE-CLOSURE TOPOGRAPHY (APPROXIMATE BOTTOM OF POND)								
CBR-7	EAST ASH POND CLOSURE BY REMOVAL PLAN								
CBR-8	EAST ASH POND CONCEPTUAL FINAL GRADING PLAN								
CBR-9	EAST ASH POND CROSS-SECTIONS								



SITE LOCATION MAP

VICINITY MAP

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REV. 1 of 9 CBR

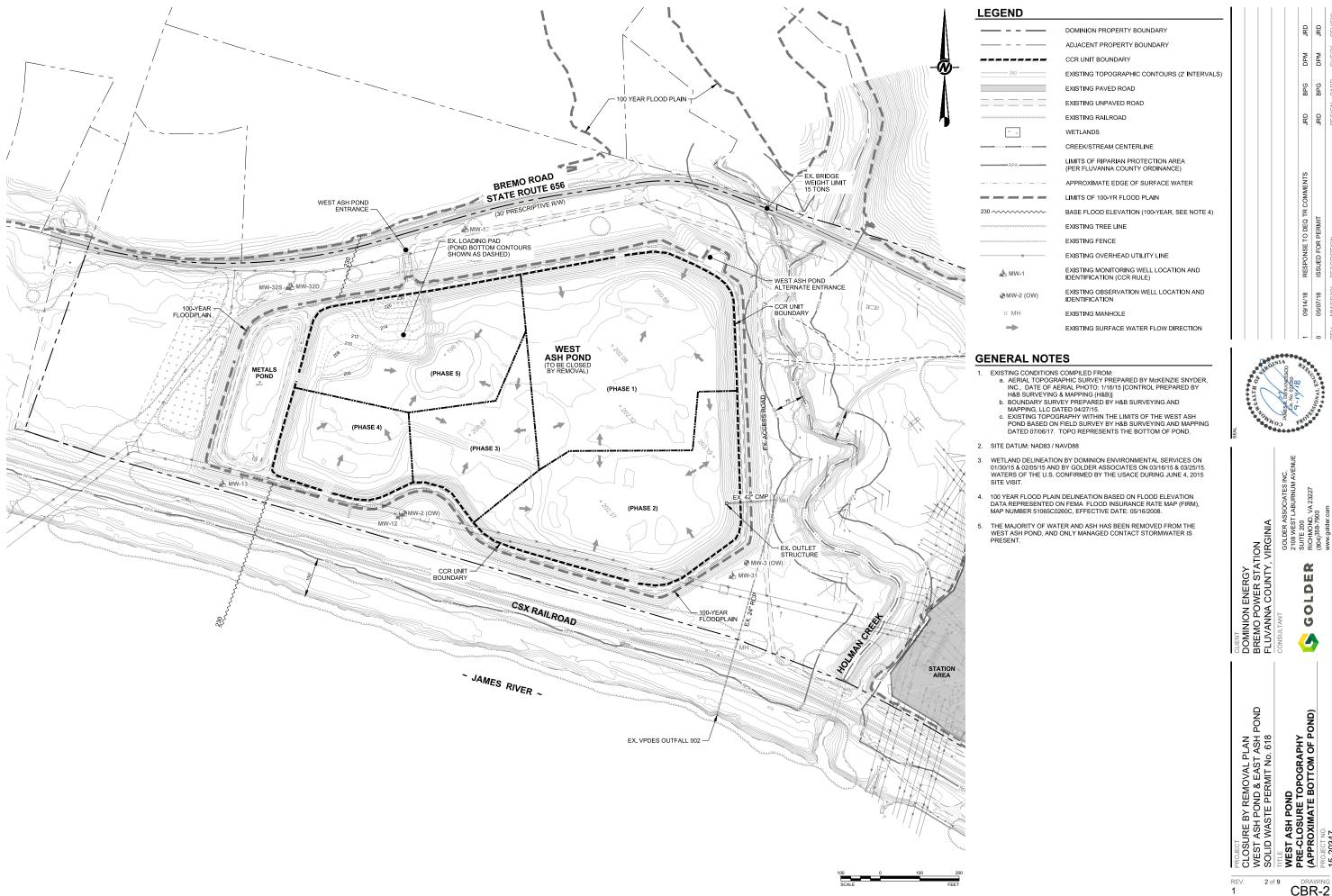
DOMINION ENERGY
BREMO POWER STATION
FLUVANNA COUNTY, VIRGINIA

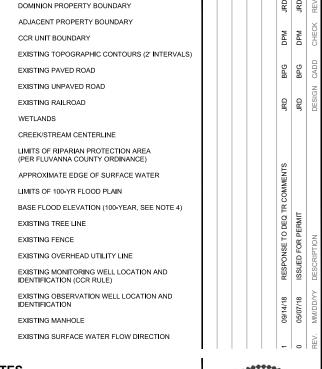
CONSULTANT
CON

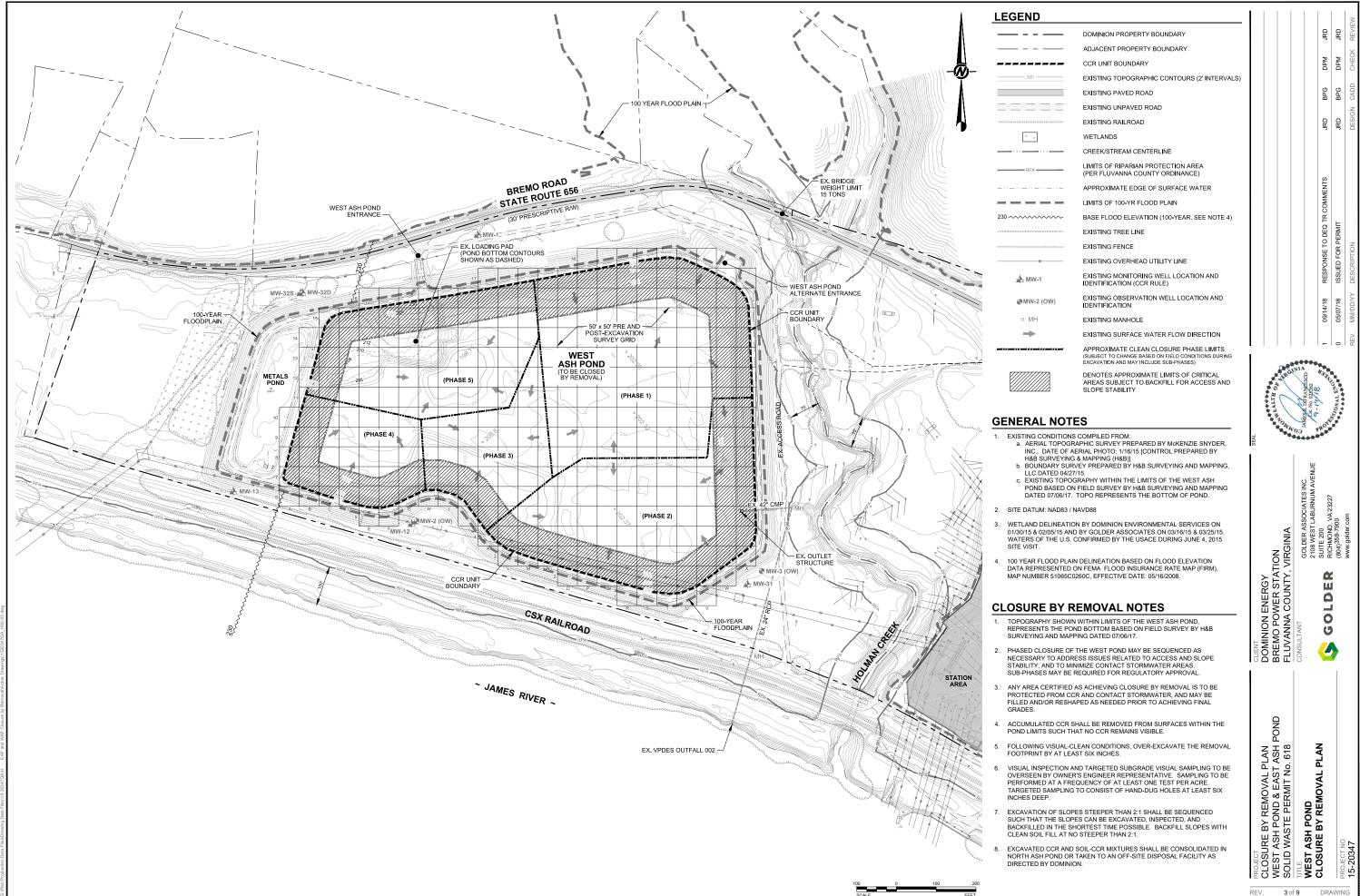
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BPG BPG

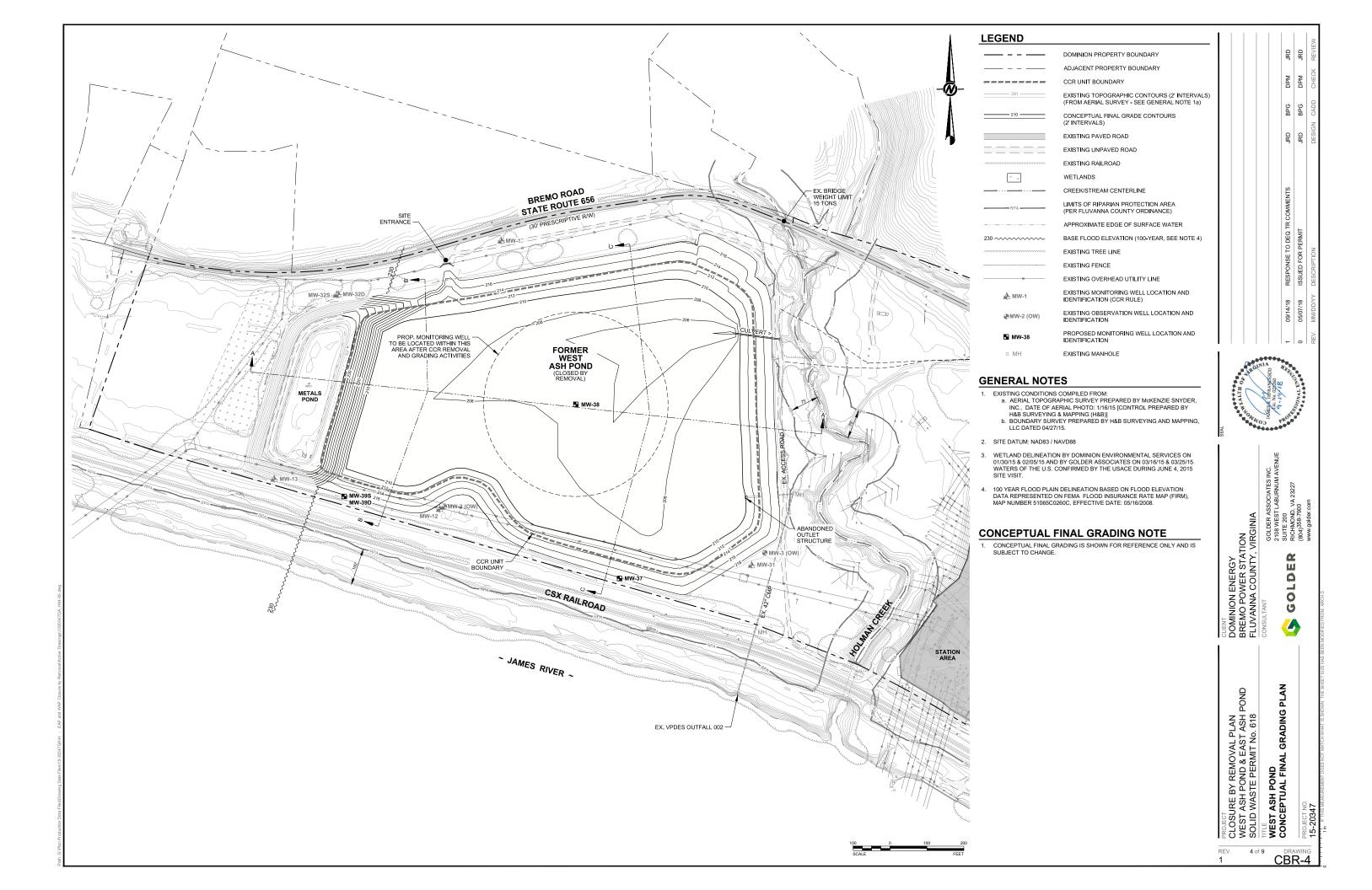
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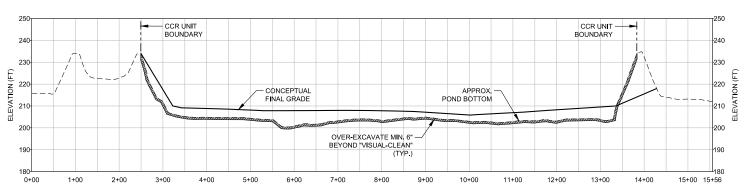




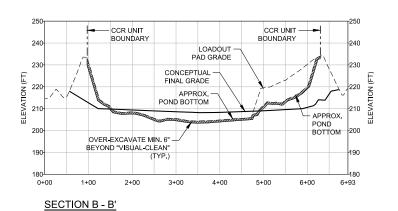


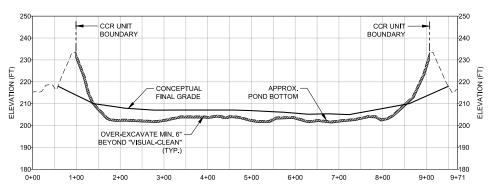
CBR-3





SECTION A - A'





SECTION C - C'

PROJECT CLOSURE BY REMOVAL PLAN WEST ASH POND & EAST ASH POND SOLID WASTE PERMIT No. 618

CLIENT
DOMINION ENERGY
BREMO POWER STATION
FLUVANNA COUNTY, VIRGINIA
CONSULTANT

WEST ASH POND CROSS-SECTIONS CBR-5

DPM DPM

BPG BPG

SRD OR

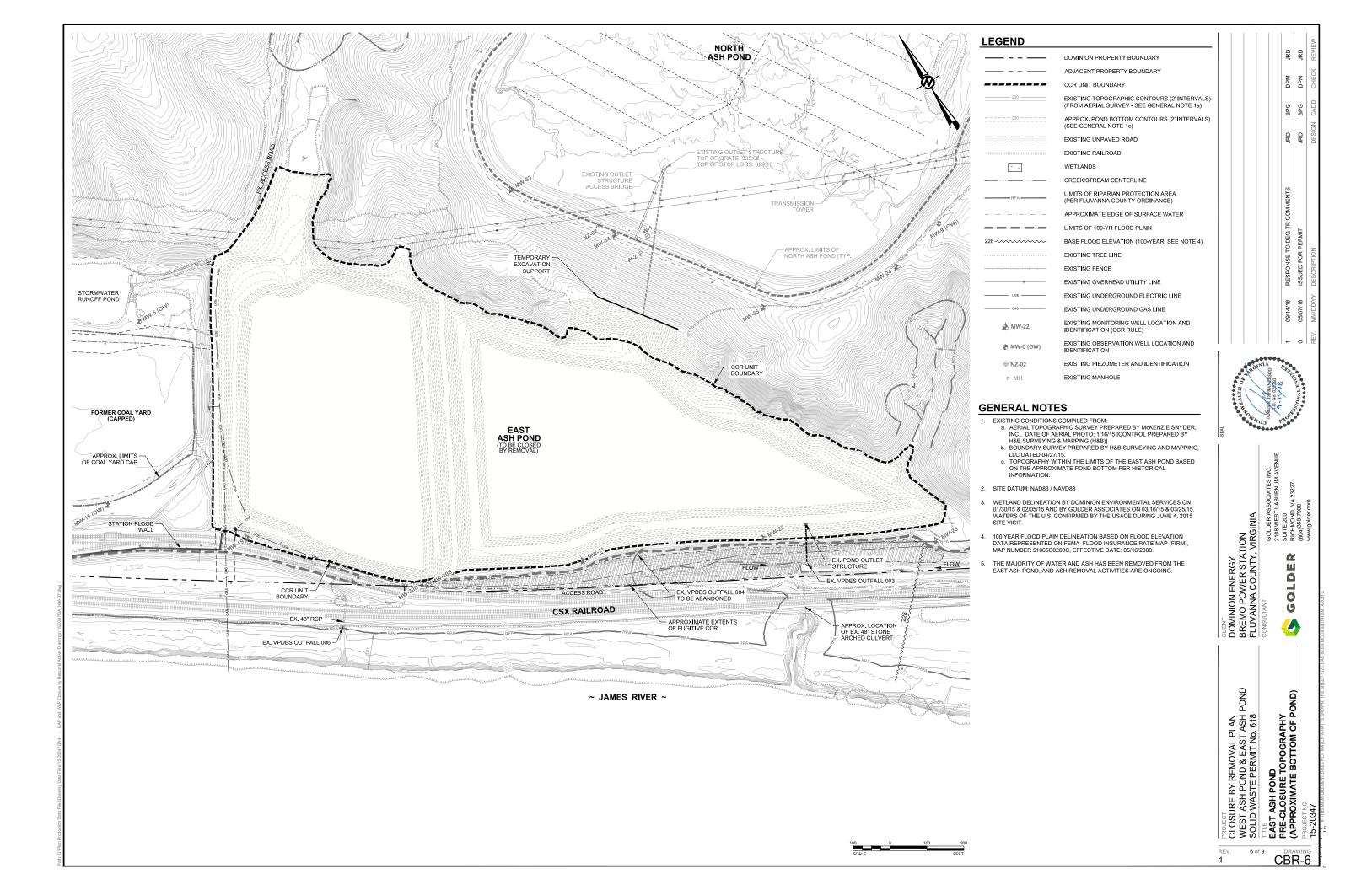
RESPONSE TO DEQ TR COMMENTS ISSUED FOR PERMIT

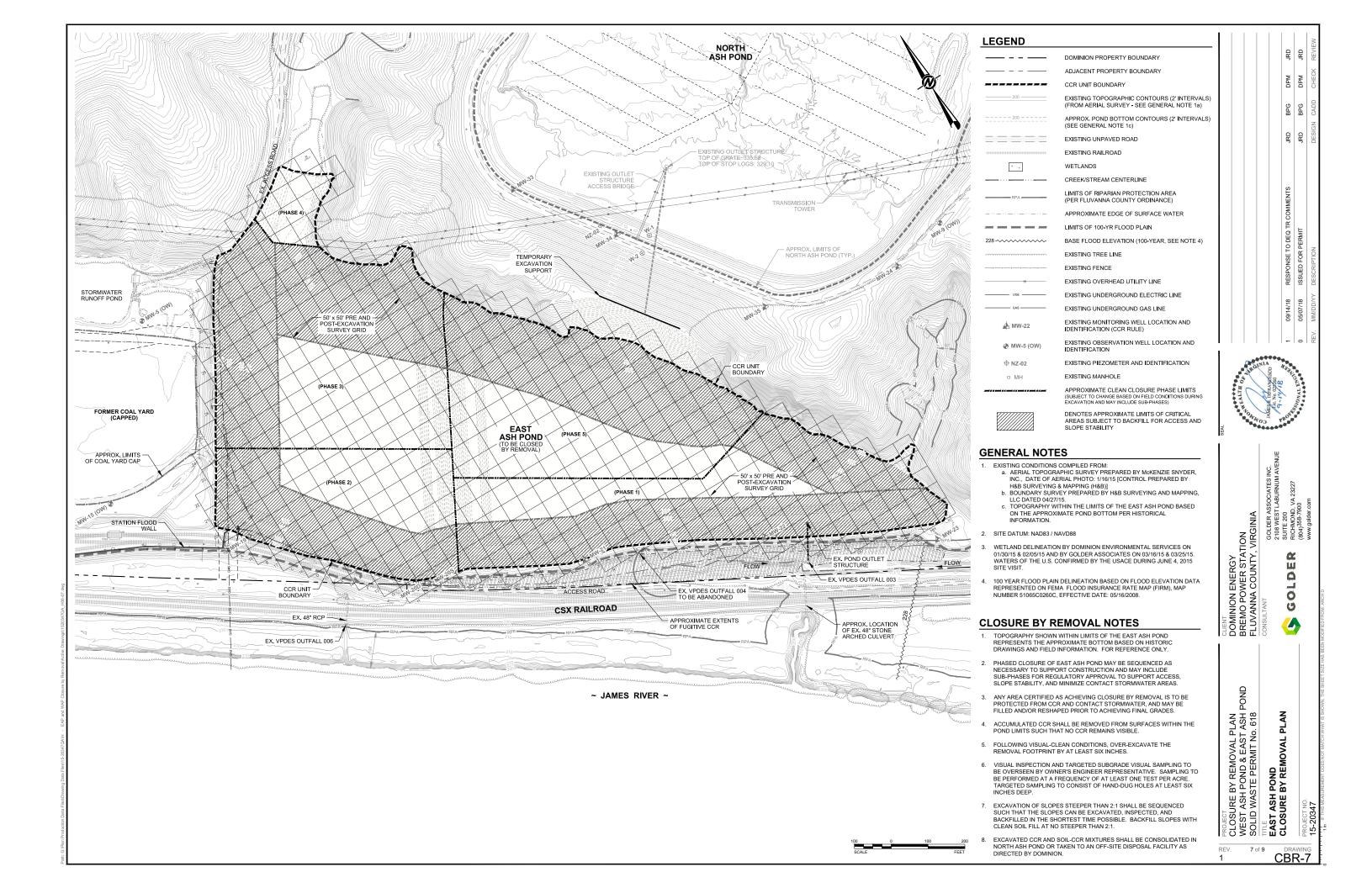
09/14/18

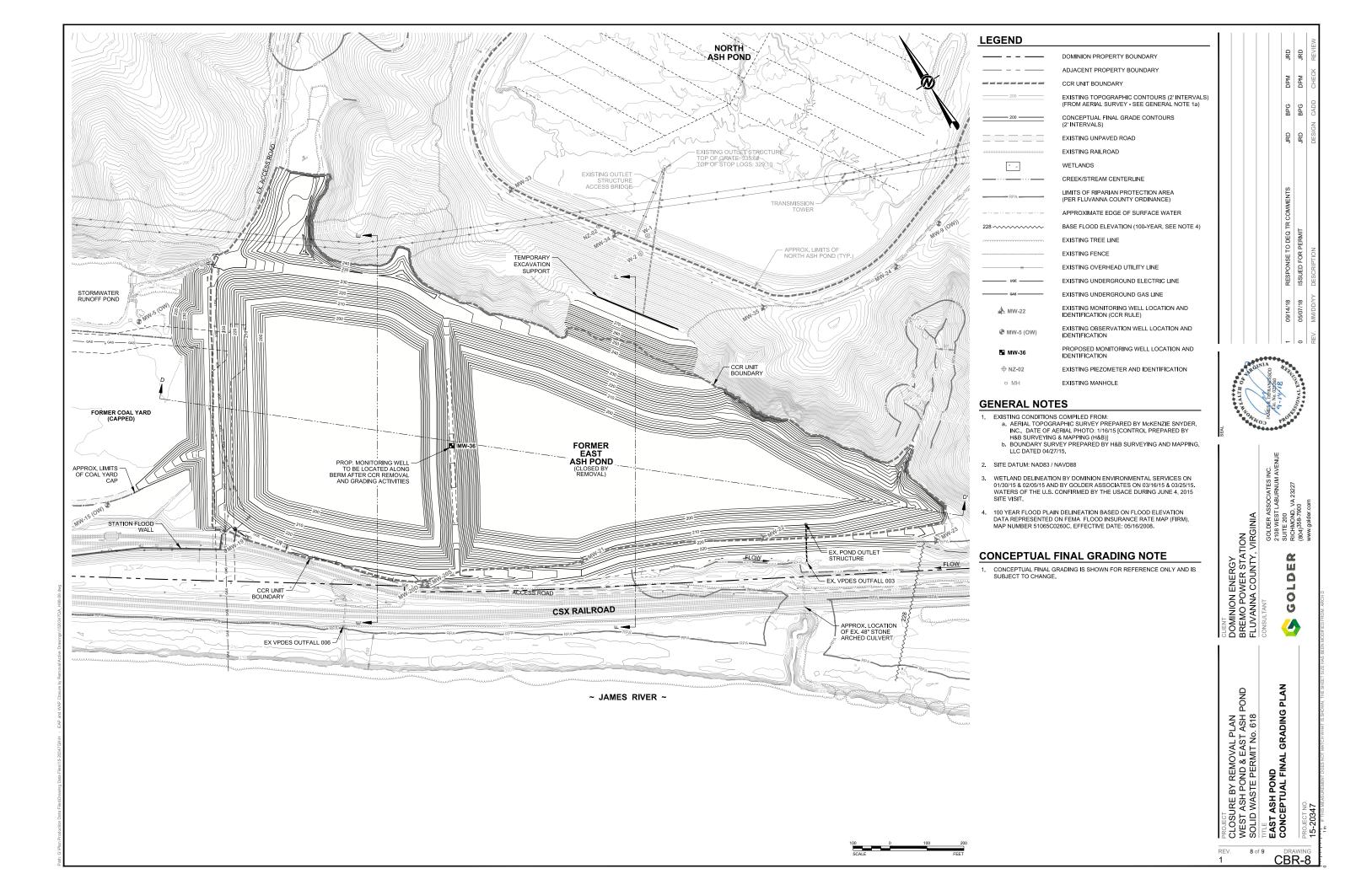
GOLDER ASSOCIATES INC. 2108 WEST LABURNUM AVENUE SUITE 200 RICHMOND, VA 23227 (1804) 588-7900

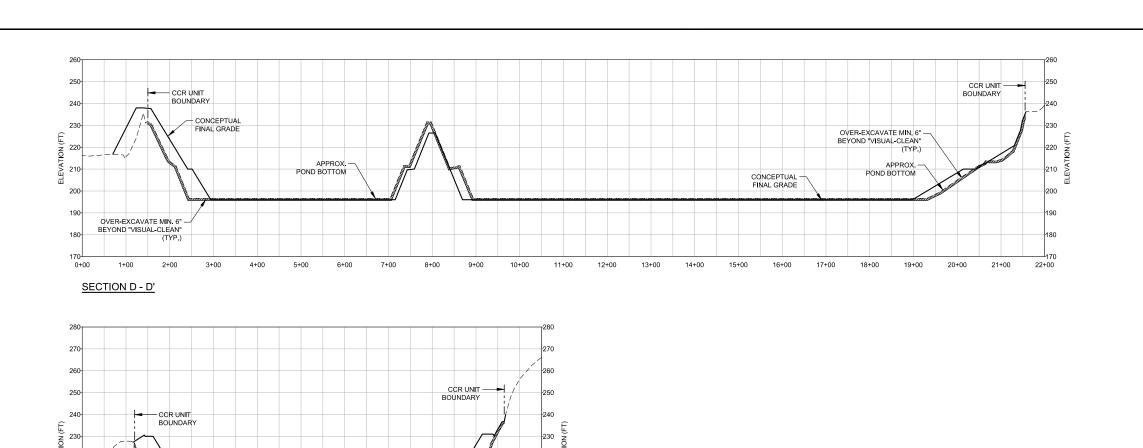
GOLDER

REV.









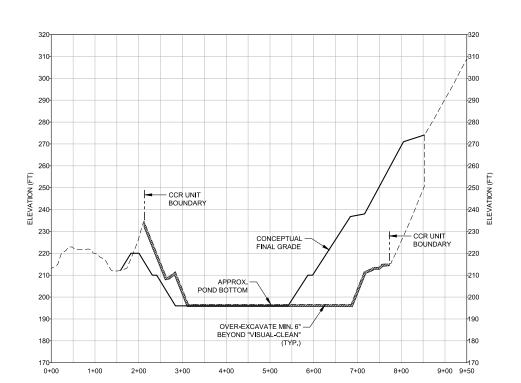
SECTION E - E'

1+00

2+00

3+00

0+00



APPROX.

4+00

5+00

6+00

CONCEPTUAL FINAL GRADE

OVER-EXCAVATE MIN. 6" -BEYOND "VISUAL-CLEAN"

7+00

8+00

9+00

10+00 10+50

PROJECT CLOSURE BY REMOVAL PLAN WEST ASH POND & EAST ASH POND SOLID WASTE PERMIT No. 618

REV. CBR-9

DOMINION ENERGY
BREMO POWER STATION
FLUVANNA COUNTY, VIRGINIA

GOLDER

EAST ASH POND CROSS-SECTIONS

8 8 B

DPM DPM

BPG BPG

R R

RESPONSE TO DEQ TR COMMENTS ISSUED FOR PERMIT

09/14/18

SECTION F - F'



Solid Waste Disposal Facility Cost Estimate Form

			-												
Facility Name: Bremo Power Station CCR Impoundments Permit No. SWP 61								618							
Address: 1038 Bremo Road															
City: Bremo Bluff State:				VA		3, 3, 3, 3, 3, 3, 3, 3, 3, 3, 3, 3, 3, 3	Zip:	23	022						
FA Holder: Dominion Energy Virginia															
Estimate Prepared By: Golder Associates Inc.															
Indicate the plan versions for which this cost estimate was prepared, identifying the following information for each plan									ch plan:						
Closure Plan Post-Closure Care Plan															
Title:		Sur	face Im	poun	dment Closur	e Plan	Title: n/a								
Plan Dat	te:	Ma	y 2018		Approved:	•	Plan Date:		Approved:						
Consulta	ant:	Gol	der Ass	ociate	es Inc.		Consultant:								
Correct	tive A	Actio	on Plan	1		_	Corrective A	Action	Monitoring	g Plan					
Title:		n/a					Title:	n/	′a						
Plan Dat	e:				Approved:		Plan Date:			Appr	oved:				
Consulta	ant:						Consultant:				HC-10-40				
Cost Es	tima	te Sı	ummar	у											
Total Clo	osure	Cost	t:			\$18,041,661									
Total Po						\$0									
Total Co	rrect	ive A	-			\$0									
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landfill c	losur	e bio	d packa	ges in	the consulta	nt's local area	•								
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or other facility assets at the time of partial or final closure. In my professional judgment, the cost estimates are a true, correct, and complete representation of the financial liabilities for closure, post-closure care, and corrective action of															
the facility and comply with the requirements of 9 VAC 20-70 and all other DEQ rules and statutes of the Commonwealth															
of Virginia.															
Name:	Ron	DiFr	ancesco	o, P.E			Signature:		N/	//					
Title:	Prin	cipal	and Pr	actice	Leader		Date:		9-14-1	ğ					
Acknov	vledg	gem	ent by	Own	er/Operator	r:		V							
Name:	Davi	id Cr	aymer			JA 8 80 80 80 80 80 80 80 80 80 80 80 80 8	Signature:	a	Jan Id	0	<i></i>				
Title:	Vice	Presi	dent, Po	wer G	eneration Syst	ems Opertions	Date:	09/07	7/18	1					

Bremo Power Station - Permit #618 East Ash Pond CCR Impoundment Closure by Removal Cost Estimate

Item	Description	Unit of	Quantity	ι	Jnit Price		Total	Notes/Assumptions
No.	·	Measure	-					•
1	Demobilization	LS	1	\$	1,099,687	\$	1,099,687	
2	General Conditions	МО	6	\$	203,688	\$	1,222,128	
	Construction Engineering / Surveying							
3	/ Permitting	MO	6	\$	20,000	\$	120,000	Existing E&S Plan amendment
	Maintain and inspect erosion /							
4	stormwater controls during	MO	6	\$	8,000	\$	48,000	
5	Dewatering	МО	6	\$	553,369	\$	3,320,214	
6	Stormwater Maintenance	МО	6	\$	24,185	\$	145,110	
_	Stormwater Maintenance	IVIO	0	ې	24,163	ې	143,110	
7	Silt Fence non-reinforced	LF	3,500	\$	4.27	\$	14,945	
8	Silt Fence removal and disposal	LF	7,527	\$	3.37	\$	25,366	
9	CCR Excavation	CY	150,000	\$	6.50	\$	975,000	
10	6-inch over-excavation (26.5 acres)	CY	21,375	\$	6.50	\$	138,938	Excavate, load, haul and place in NAP
11	Soil backfill for slope stabilization	CY	250,000	\$	25.00	\$	6,250,000	Excavate, load, place and compact.
12	Site stabilization	Ac	27	\$	3,500.00	\$	94,500	
13	Closure sign	Ea	1	\$	125	\$	125	
14	Contingency	%	13,454,012		10%	\$	1,345,401	
15	3rd party certification survey	Ac	27	\$	4,500	\$	119,250	
16	Construction QA/QC oversight	МО	6	\$	20,000	\$	120,000	
16	Closure certification report	LS	1	\$	8,000	\$	8,000	
17	Groundwater Monitoring	LS	1	\$	66,380	\$	66,380	Minimum remaining sampling events to demonstrate closure
			-		Total	\$	15,113,044	

Notes: 1. Estimate based on starting with current condition as of September 14, 2018 to achieve clean closure condition

Bremo Power Station - Permit #618 West Ash Pond CCR Impoundment Closure by Removal Cost Estimate

Item	Description	Unit of	Quantity	u	Init Price		Total	Notes/Assumptions
No.	•	Measure	Quality					Trocoo, radamparene
	Mobilization/Demobilization							
1	General Conditions	LS	1	\$	75,000	\$	75,000	
	Construction Engineering / Surveying		_	_	25.000	_	25.000	5
2	/ Permitting	LS	1	\$	35,000	\$	35,000	Existing E&S Plan amendment
	Maintain and inspect erosion /	140		٠	F 000	٠	20.000	
3	stormwater controls during	MO	4	\$	5,000	\$	20,000	
4	Stormwater Maintenance	МО	4	\$	27,300	\$	109,200	
5	Silt Fence non-reinforced	LF	3,000	\$	4.27	\$	12,810	
6	Silt Fence removal and disposal	LF	3,000	\$	3.37	\$	10,110	
7	6-inch over-excavation (17 acres)	CY	13,709	\$	6.50	\$	89,109	Excavate, load, haul and place in NAP
								Partial removal and elimination from
8	Embankment removal	CY	80,000	\$	25.00	Ş	2,000,000	Dam Safety program
9	Site stabilization	Ac	17	\$	3,500.00	\$	59,500	
10	Closure sign	Ea	1	\$	125	\$	125	
11	Contingency	%	2,410,854		10%	\$	241,085	
12	3rd party certification survey	Ac	17	\$	4,500	\$	76,500	
13	Construction QA/QC oversight	LS	1	\$	93,500	\$	93,500	
14	Closure certification report	LS	1	\$	8,000	\$	8,000	
15	Groundwater Monitoring	Ls	1	\$	98,678	\$	98,678	Minimum remaining sampling events to demonstrate closure
					Total	\$	2,928,617	

Notes: 1. Estimate based on starting with current condition as of September 14, 2018 to achieve clean closure condition

Established in 1960, Golder Associates is a global, employee-owned organization that helps clients find sustainable solutions to the challenges of finite resources, energy and water supply and management, waste management, urbanization, and climate change. We provide a wide range of independent consulting, design, and construction services in our specialist areas of earth, environment, and energy. By building strong relationships and meeting the needs of clients, our people have created one of the most trusted professional services organizations in the world.

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