

2026 Biennial Progress Report Coal Combustion Residuals Unit Closures

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Executive Summary

In accordance with Virginia Code § 10.1-1402.03(G)(1), this Biennial Progress Report documents Dominion Energy Virginia's (Dominion Energy) progress to date closing the Coal Combustion Residuals (CCR) units subject to the 2019 legislation (SB 1355). This report documents the closure plan, closure progress to date, accounting of CCR disposal and beneficial use amounts, description of transportation planning, and a discussion of groundwater and surface water monitoring results, for each applicable CCR unit at Dominion Energy's Chesterfield Power Station, Bremo Power Station, Possum Point Power Station, and Chesapeake Energy Center. The CCR unit closure progress to date is summarized below with details provided for each station in the following sections of this report.

Chesterfield Power Station

- The closure plan includes excavation and removal of CCR from the Upper Ash Pond (11.3 million cubic yards (Mcy)) and the Lower Ash Pond (3.6 Mcy), disposal of approximately 8.1 Mcy in the existing on-site CCR landfill and transporting an estimated 6.8 Mcy off-site by rail for beneficial use.
- CCR closure operations are underway including ongoing removal of CCR from the Upper and Lower Ash Ponds, placing CCR in the onsite CCR landfill, and transporting CCR off-site by rail for beneficial use.
- CCR is actively being transported by rail for beneficial use at Amrize's cement kiln in Holly Hill, SC. CCR is also being transported to Amrize's Skippers, VA facility in preparation for beneficiation with the Ponded Ash Beneficiation System (PABS) currently under construction.
- Upper Ash Pond – As of June 30, 2026, approximately 951,136 cy of CCR has been excavated and transported off-site for beneficial use, and 1,721,273 cy of CCR has been excavated and transported to the on-site CCR landfill for disposal.
- Lower Ash Pond – As of June 30, 2026, approximately 1,990,349 cy of CCR has been excavated and transported to the on-site CCR landfill for disposal.

Bremo Power Station

- The closure plan includes excavation and removal of approximately 6.2 Mcy of CCR from the North Ash Pond for placement in a new on-site CCR landfill to be constructed adjacent to the North Ash Pond.
- Constructed an onsite water treatment system and initiated operations on May 9, 2024.
- Received solid waste permit (SWP 627) from DEQ on June 30, 2025, for constructing the new CCR landfill.
- Awarded a contract for CCR excavation and landfill construction on July 3, 2025, and initiated site work including construction of the 47-acre landfill facility.

Possum Point Power Station

- The closure plan includes excavation and removal of approximately 4 Mcy of CCR from Pond D for placement in a new on-site CCR landfill to be constructed adjacent to Pond D.
- Constructed an onsite water treatment system and initiated operations in January 2026.
- Received VPDES permit renewal effective July 1, 2026.
- Working with DEQ to finalize SWP 628 Part B for CCR landfill construction and SWP 617 for Pond D closure. Site Plan for the CCR closure project is under review by Prince William County.
- Issued a Request for Proposals for the CCR excavation and landfill construction project in April 2026, received multiple bids, and currently negotiating contractual terms with selected bidder.

Chesapeake Energy Center

- The closure plan includes excavation and removal of approximately 2.2 Mcy of CCR from the site, including the landfill, bottom ash pond, and historical pond, for off-site transportation by rail (or barge) and truck for disposal and/or beneficial use.
- Received from DEQ VPDES permit renewal effective May 1, 2026, and modified solid waste permit (SWP 440) for closure of the CCR areas on July 31, 2026.
- Final design and Request for Proposals for closure of the Bottom Ash Pond (BAP) is in process to close the BAP by the September 2027 regulatory deadline; site plan and transportation plan approvals are being coordinated with the City of Chesapeake in accordance with the City-issued Conditional Use Permit.

Summary of CCR quantities for closure activities as of June 30, 2026 (cubic yards).

Station	CCR Unit or Area	CCR Quantity per Unit	Beneficial Use Expected	Beneficial Use Actual	Landfill Expected	Landfill Actual
Chesterfield Power Station	Upper Ash Pond	11,300,000	~6,800,000	951,136	~4,500,000	1,721,273
	Lower Ash Pond	3,600,000			3,600,000	1,990,349
Bremo Power Station	North Ash Pond	6,200,000	0		6,200,000	
Possum Point Power Station	Pond D	4,000,000	0		4,000,000	
Chesapeake Energy Center	Landfill, Bottom Ash Pond, Historical Pond	2,200,000	~40,000		~2,160,000	
Total		27,300,000	~6,840,000 (minimum)	951,136	~20,500,000	3,711,622

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Acronyms

ACM	Assessment of Corrective Measures
AECOM	AECOM Technical Services, Inc.
CCR	coal combustion residuals
CFR	Code of Federal Regulations
CPS	Chesterfield Power Station
CUP	Conditional Use Permit
cy	cubic yard
DEQ	(Virginia) Department of Environmental Quality
GPS	Groundwater protection standard
LAP	lower ash pond
Mcy	million cubic yards
MOU	Memorandum of Understanding
RFP	request for proposals
SB	Senate Bill
SWP	Solid Waste Permit
UAP	upper ash pond
VA	Virginia
VPDES	Virginia Pollutant Discharge Elimination System
VSWMR	Virginia Solid Waste Management Regulations

1. Introduction

This Biennial Progress Report documents Dominion Energy's CCR Unit Closure progress in accordance with Virginia Code § 10.1-1402.03 (SB 1355). Subsection G of the law requires submission of the initial biennial report by October 1, 2022, and no less frequently than every two years thereafter until closure of all CCR units is complete. The report must include:

- Description of the closure plan for all CCR units.
- Closure progress to date.
- Detailed accounting of amount of CCR by unit and in total that have been and are expected to be beneficially used.
- Detailed accounting of amount of CCR by unit and in total that have been and are expected to be landfilled.
- Detailed accounting of the utilization of transportation options and a Transportation Plan.
- Discussion of groundwater and surface water monitoring results and measures taken to address such results as closure is being completed.

The following sections of this report provide the required information for each station.

2. Chesterfield Power Station

2.1 Background

Two on-site CCR surface impoundments - Lower Ash Pond (LAP) and Upper Ash Pond (UAP) - at the Chesterfield Power Station (CPS) are subject to the requirements of SB 1355 and the federal CCR Rule. CPS ceased coal-fired generation in 2023. The 101-acre LAP was constructed in 1964 and the 112-acre UAP in 1983. The UAP contains approximately 11.3 million cubic yards (Mcy) of CCR, and the LAP contains approximately 3.6 Mcy.

2.2 Closure Plan

Closure by removal of the UAP and LAP will comply with the federal CCR Rule Closure by Removal requirements (40 CFR § 257.102(c)), SB 1355, and the VSWMR. A Solid Waste Permit for the UAP and LAP closures (SWP 619) was issued by DEQ in September 2025 and covers all details of the final closure and restoration, as well as groundwater and surface water monitoring.

The Closure Plan includes:

- Excavation of all CCR from the UAP and LAP for landfill disposal as well as any associated on-site screening, drying, and handling to meet applicable criteria for beneficial use.
- Transportation of approximately 8.1 Mcy to the on-site CCR landfill for disposal.
- Transportation of approximately 6.8 Mcy to the on-site rail loading facility and subsequent off-site transportation by rail for beneficial use.
- Closure and restoration of the UAP and LAP.

- Long term groundwater and surface water monitoring, as required.

2.3 Closure Progress to Date

The following significant CCR closure activities have been completed to date:

- Construction and operation of an onsite water treatment system.
- Construction and operation of a rail loading facility and associated rail infrastructure.
- Construction and operation of a truck wash system, water lines, dewatering systems, roads, and material handling systems to support project operations.
- CCR Landfill: Ongoing operations to place CCR in Phases 1, 2, and 3 of the CCR landfill. Since the previous 2024 Biennial Report, the Company has received a Certificate to Operate (CTO) for Phase 3 South on February 3, 2025, and Phase 3 North on April 24, 2025. Phase 4 is currently under construction.
- Beneficial Use at Holly Hill, SC facility: Ongoing transportation of CCR by rail to the Holly Hill cement kiln facility owned by Amrize (formerly Holcim).
- Beneficial Use at the Skippers, VA facility: Initiated transportation of CCR by rail to the Skippers facility, owned by Amrize, for storage until the onsite beneficiation system is operational. Significant progress at the Skippers facility includes completion of the landfill cell 1, construction of cell 2, completion of the fly ash silo, delivery of Ponded Ash Beneficiation System (PABS) major equipment, and completion of site preparation, earthwork, and concrete foundations for PABS installation.
- As of June 30, 2026, the project team has completed excavation of approximately 2,672,409 cy of CCR from the UAP, and approximately 1,990,349 cy from the LAP.
- Ongoing semi-annual groundwater and surface water monitoring and corrective action evaluations.

2.4 Accounting of CCR Beneficially Used

Approximately 951,136 cy has been transported offsite by rail for beneficial use through June 30, 2026.

2.5 Accounting of CCR Landfilled

Approximately 3,711,622 cy has been transported to the on-site landfill for disposal through June 30, 2026.

2.6 Transportation Options and Plans

SB 1355 requires Dominion Energy to remove all CCR currently stored in two ash ponds at Chesterfield Power Station within 15 years. The law also requires the development of a Transportation Plan to address various transportation-related concerns related to the removal of CCR off-site. Dominion Energy has worked closely with Chesterfield County to develop a Transportation Plan to avoid, minimize, and mitigate traffic impacts from CCR removal activities.

In developing the Transportation Plan, and as outlined in the agreed upon Memorandum of Understanding (MOU) with Chesterfield County that addresses transportation and public access impacts,

Dominion Energy and the County focused their evaluation on safety, environmental protection, local road use and traffic needs, noise control, dust mitigation, and preserving access to the important historic and recreational areas near the Chesterfield Power Station. Under the Transportation Plan, Dominion Energy will:

- Make public roadway improvements at the beginning of the project.
- Ensure roadways are maintained to Virginia Department of Transportation standards for the duration of the trucking operations.
- Follow all relevant federal, state, and local regulations on noise levels.
- Employ accepted practices to mitigate and control dust.

The Transportation Plan lays out planned trucking routes and identifies impacted roads and intersections and is available at <https://www.dominionenergy.com/projects-and-facilities/electric-projects/coal-ash/chesterfield-power-station-coal-ash-project>.

As part of the Transportation Plan and pursuant to the MOU with Dominion Energy, Chesterfield County plans to develop new recreational facility improvements to provide additional access to Henricus Historical Park and other local recreational resources. The County's current recreational improvement plans include a new access bridge to Henricus Park and a new boat ramp on the James River.

The MOU and Transportation Plan were both finalized in 2020. Dominion Energy has implemented community outreach and engagement following the finalization of these documents and will continue such outreach throughout the project.

2.7 Groundwater and Surface Water Monitoring

Semi-annual groundwater monitoring is conducted in accordance with the Assessment Monitoring Program in the CCR Rule (40 CFR § 257.95) and the CPS Groundwater Monitoring Plan. Annual Groundwater Monitoring and Corrective Action Reports are submitted to DEQ and posted on Dominion Energy's publicly accessible CCR Rule Compliance Data & Information website: <https://www.dominionenergy.com/projects-and-facilities/electric-projects/coal-ash/ccr-rule-compliance-data-and-information>.

The most recent groundwater monitoring for the UAP and LAP identified exceedances of applicable Groundwater Protection Standards (GPS) for certain constituents, generally consistent with previous results.

In accordance with 40 CFR § 257.97 and the VSWMR, Dominion Energy has developed an Assessment of Corrective Measures (ACM) to evaluate groundwater conditions, the nature and extent of GPS exceedances, and potential corrective measures.

The ACM concludes that constituents above their GPS are not expected to pose a risk to human health or the environment and identifies several remedial options, including source removal with long term monitoring of groundwater. The ACM further notes that future studies may be necessary to validate natural recovery mechanisms and timeframes. Dominion Energy held a public meeting on its ACM on August 18, 2026, and is following the Corrective Action process outlined in the CCR Rule and the VSWMR.

In addition to the groundwater monitoring requirements mentioned above, the UAP and LAP Solid Waste Permit (SWP 619), issued September 22, 2025, includes quarterly surface water monitoring requirements pursuant to a DEQ-approved Surface Water Monitoring Plan.

3. Brema Power Station

3.1 Background

One on-site CCR surface impoundment (North Ash Pond, or NAP) at the Brema Power Station (Brema) is subject to the requirements of SB 1355 and the federal CCR Rule. The NAP was constructed as an unlined pond in 1983. Brema ceased coal-fired generation in 2014, and all power generation was retired in 2018. CCR from the former West and East Ash Ponds was subsequently excavated and consolidated in the NAP, and a temporary geomembrane rain cover was installed in 2019 to prevent stormwater contact and infiltration. The NAP contains an estimated 6.2 Mcy of CCR.

3.2 Closure Plan

Closure by removal of the NAP will comply with the federal CCR Rule Closure by Removal requirements (40 CFR § 257.102(c)), SB 1355, and the VSWMR. A new CCR landfill (SWP 627) was permitted by DEQ on adjacent Dominion Energy-owned property to receive the CCR removed from the NAP. Construction of the new landfill is underway.

The Closure Plan includes:

- Construction of a new on-site CCR landfill located immediately east of the NAP.
- Excavation and onsite transportation of approximately 6.2 Mcy of CCR and placement in the new landfill for disposal.
- Closure and restoration of the NAP.
- Long term groundwater and surface water monitoring, as required.

3.3 Closure Progress to Date

The following significant CCR closure activities have been completed to date:

- Received Special Use Permit from Fluvanna County in June 2021 for new CCR landfill.
- Construction and operation of an onsite water treatment system.
- Received all required environmental permits associated with constructing the new CCR landfill. The final Solid Waste Permit (SWP 627) was issued on June 30, 2025.
- Awarded a contract for CCR excavation and landfill construction on July 3, 2025, and initiated site work including construction of:
 - Sediment basins #1 and #2,
 - The facility perimeter road,
 - Contact water basin
 - The underdrain system, and
 - The 47-acre landfill facility

- Ongoing semi-annual groundwater monitoring, quarterly surface water monitoring, and corrective action evaluations.

3.4 Accounting of CCR Beneficially Used

Dominion Energy is currently constructing a landfill on Company-owned property adjacent to the NAP to receive all CCR removed from the NAP. None of the CCR in the NAP is planned to be beneficially used.

3.5 Accounting of CCR Landfilled

The CCR landfill is under construction, and acceptance of CCR will be initiated after receiving a Certificate to Operate (CTO) from DEQ.

3.6 Transportation Options and Plans

SB 1355 requires Dominion Energy to remove all CCR currently stored in the NAP within 15 years. The law also requires the development of a Transportation Plan to address various transportation-related concerns related to the removal of CCR off-site as part of closure of the CCR units. All CCR transportation from the NAP to the new landfill is planned to occur within Company property on internal haul roads, and no off-site transportation of CCR is expected.

Nonetheless, Dominion Energy intends to work closely with Fluvanna County to avoid, minimize, and mitigate potential traffic impacts associated with project construction, such as importing fill materials, construction equipment, and supplies.

3.7 Groundwater and Surface Water Monitoring

Semi-annual groundwater monitoring is conducted in accordance with the Assessment Monitoring Program in the CCR Rule (40 CFR § 257.95) and the Bremo CCR Surface Impoundments SWP 618 and Groundwater Monitoring Plan. Annual Groundwater Monitoring and Corrective Action Reports are submitted to DEQ and posted on Dominion Energy's publicly accessible CCR Rule Compliance Data & Information website: <https://www.dominionenergy.com/projects-and-facilities/electric-projects/coal-ash/ccr-rule-compliance-data-and-information>.

The most recent groundwater monitoring for the NAP identified exceedances of applicable Groundwater Protection Standards (GPS) for certain constituents, generally consistent with historical results.

In accordance with 40 CFR § 257.97 and the VSWMR, Dominion Energy has initiated an Assessment of Corrective Measures (ACM) to evaluate groundwater conditions, the nature and extent of GPS exceedances, and potential corrective measures.

The ACM concludes that constituents above their GPS are not expected to pose a risk to human health or the environment and identifies several remedial options, including source removal with long term monitoring of groundwater. The ACM further notes that future studies may be necessary to validate natural recovery mechanisms and timeframes. Dominion Energy is following the Corrective Action process outlined in the CCR Rule and the VSWMR and submitted a proposed Corrective Action Plan to DEQ in December 2024.

SWP 618 requires quarterly surface water monitoring as a complement to groundwater monitoring. Results of surface water monitoring in the James River to date have not shown exceedances of applicable standards for the constituents tested.

4. Possum Point Power Station

4.1 Background

One on-site CCR surface impoundment (Pond D) at the Possum Point Power Station (Possum Point) is subject to the requirements of SB 1355 and the federal CCR Rule. Pond D was constructed as a clay-lined pond in 1988. Possum Point ceased coal-fired generation in 2003. CCR from former Ponds ABC and Pond E was subsequently excavated and consolidated in Pond D. Pond D contains an estimated 4 Mcy of CCR.

4.2 Closure Plan

Closure by removal of Pond D will comply with the federal CCR Rule Closure by Removal requirements (40 CFR § 257.102(c)), SB 1355, and the VSWMR. A new on-site CCR landfill (SWP 628) is being permitted with DEQ on adjacent Dominion Energy-owned property to receive the CCR removed from Pond D.

The Closure Plan includes:

- Construction of a new on-site CCR landfill located immediately west of Pond D.
- Excavation and onsite transportation of approximately 4 Mcy of CCR and placement in the new landfill for disposal.
- Closure and restoration of Pond D.
- Long term groundwater and surface water monitoring, as required.

4.3 Closure Progress to Date

The following significant CCR closure activities have been completed to date:

- Received zoning determination from Prince William County in May 2022 for new CCR landfill.
- Constructed an onsite water treatment system and initiated operation in January 2026.
- Received Army Corps of Engineers State Programmatic General Permit (SPGP) for wetland and surface water impacts in 2023 and a Part A Solid Waste Permit (SWP 628) approval from DEQ in 2024, both for the new landfill. A VPDES permit renewal was also issued by DEQ, effective July 1, 2026.
- Working with regulatory agencies to finalize remaining permits in process including the SWP 628 Part B for CCR landfill construction and SWP 617 for Pond D closure under review by DEQ, and the Site Plan under review by Prince William County.
- Released a Request for Proposals (RFP) for the CCR excavation and landfill construction project in April 2026, received multiple bids, and currently negotiating contractual terms with the selected bidder.
- Ongoing semi-annual groundwater monitoring, quarterly surface water monitoring, and corrective action evaluations.

4.4 Accounting of CCR Beneficially Used

Dominion Energy is planning to construct a landfill on Company-owned property adjacent to Pond D. The new CCR landfill will be designed and constructed to receive all CCR removed from Pond D. None of the CCR in Pond D is planned to be beneficially used.

4.5 Accounting of CCR Landfilled

CCR closure construction has not been initiated pending receipt of all permits, completion of procurement activities, and construction of the new landfill.

4.6 Transportation Options and Plans

SB 1355 requires Dominion Energy to remove all CCR currently stored in Pond D within 15 years. The law also requires the development of a Transportation Plan to address various transportation-related concerns related to the removal of CCR off-site as part of closure of the CCR units. All CCR transportation from Pond D to the new landfill is planned to occur within Company property, and no off-site transportation of CCR is expected.

Nonetheless, Dominion Energy intends to work closely with Prince William County and the local community to avoid, minimize, and mitigate potential traffic impacts associated with project construction, such as importing fill materials, construction equipment, and supplies.

4.7 Groundwater and Surface Water Monitoring

Semi-annual groundwater monitoring is conducted in accordance with the Assessment Monitoring Program in the CCR Rule (40 CFR § 257.95), SWP 617, and a Groundwater Monitoring Plan. Annual Groundwater Monitoring and Corrective Action Reports are submitted to DEQ and posted on Dominion Energy's publicly accessible CCR Rule Compliance Data & Information website:

<https://www.dominionenergy.com/projects-and-facilities/electric-projects/coal-ash/ccr-rule-compliance-data-and-information>.

The most recent groundwater monitoring for Pond D identified exceedances of applicable Groundwater Protection Standards (GPS) for certain constituents, generally consistent with historical results.

In accordance with 40 CFR § 257.97 and the VSWMR, Dominion Energy conducted an Assessment of Corrective Measures (ACM) to evaluate groundwater conditions, the nature and extent of GPS exceedances, and potential corrective measures. The ACM concludes that constituents above their GPS are not expected to pose a risk to human health or the environment and identifies several remedial options, including source removal with long term monitoring of groundwater. The ACM further notes that future studies may be necessary to validate natural recovery mechanisms and timeframes. Dominion Energy is following the Corrective Action process outlined in the CCR Rule and the VSWMR and submitted a proposed Corrective Action Plan to DEQ in August 2025.

SWP 617 requires quarterly surface water monitoring as a complement to groundwater monitoring. Results of surface water monitoring in Quantico Creek and the Potomac River to date have not shown exceedances of applicable standards for the constituents tested.

5. Chesapeake Energy Center

5.1 Background

Chesapeake Energy Center includes a landfill, a CCR surface impoundment (Bottom Ash Pond), and an underlying historical pond. These areas are subject to closure under SB 1355, the VSWMR, and/or the CCR Rule. The current configuration of the CCR areas was developed in approximately 1985 when the landfill and adjacent Bottom Ash Pond were constructed on top of the historical pond area. CCR disposal ceased in 2015 following shutdown of the coal-fired units. The CCR areas collectively cover approximately 40 acres and contain an estimated 2.2 Mcy of CCR (approximately 1.2 Mcy in the landfill; 40,000 cy in the bottom ash pond; and 950,000 cy in the historical pond).

5.2 Closure Plan

Closure by removal of the CCR areas will comply with the federal CCR Rule Closure by Removal requirements (40 CFR § 257.102(c)), SB 1355, and the VSWMR.

The Closure Plan includes:

- Excavation and removal of 2.2 Mcy of CCR from the landfill, bottom ash pond, and historical pond.
- Removal of CCR from the Bottom Ash Pond (BAP) by September 2027 to comply with federal CCR rule requirements. Dominion Energy currently plans to transport the CCR from the BAP off-site for beneficial use.
- Off-site transportation of all remaining CCR by rail (or barge) and truck for disposal and/or beneficial use.
- Closure and restoration of the CCR areas.
- Long term groundwater and surface water monitoring, as required.

5.3 Closure Progress to Date

The following significant CCR closure activities have been completed to date:

- Received a Conditional Use Permit (CUP) from the City of Chesapeake in December 2022, a VPDES renewal permit from DEQ effective May 1, 2026, and SWP 440 modification for closure of the CCR areas from DEQ July 31, 2026.
- Final design and Request for Proposals (RFP) for closure of the Bottom Ash Pond is in process to close the BAP by the September 2027 regulatory deadline.
- Ongoing semi-annual groundwater monitoring, semi-annual surface water monitoring, and corrective action evaluations.

5.4 Accounting of CCR Beneficially Used

CCR beneficiation has not been initiated pending completion of procurement activities and planned closure of the Bottom Ash Pond by September 2027.

5.5 Accounting of CCR Landfilled

CCR closure construction has not been initiated pending completion of final design, RFP, and procurement activities.

5.6 Transportation Options and Plans

SB 1355 requires Dominion Energy to remove all CCR currently stored in the CCR areas at the Chesapeake Energy Center within 15 years. The law also requires the development of a Transportation Plan to address various transportation-related concerns related to the removal of CCR offsite as part of closure of the CCR areas.

Dominion Energy has worked closely with the City of Chesapeake (City) to address potential impacts from off-site trucking. The CUP issued by the City includes significant parameters to be incorporated into the Transportation Plan, including a requirement that rail (or barge) be the primary means (at least 51%) of CCR transportation off-site, limits on truck traffic, sealed trucks, proposed haul routes, and road repairs. Dominion Energy will continue working with the City to develop the Transportation Plan in accordance with the CUP and the proposed transportation methods for the final selected off-site disposal or beneficial use options.

5.7 Groundwater and Surface Water Monitoring

Semi-annual groundwater monitoring is conducted in accordance with the Assessment Monitoring Program in the CCR Rule (40 CFR § 257.95), SWP 440, and Groundwater Monitoring Plans. Annual Groundwater Monitoring and Corrective Action Reports are submitted to DEQ and posted on Dominion Energy's publicly accessible CCR Rule Compliance Data & Information website:

<https://www.dominionenergy.com/projects-and-facilities/electric-projects/coal-ash/ccr-rule-compliance-data-and-information>.

The most recent groundwater monitoring for the Chesapeake Energy Center CCR areas identified exceedances of Groundwater Protection Standards (GPS) for certain constituents, generally consistent with historical results.

In accordance with 40 CFR § 257.97 and the VSWMR, Dominion Energy has initiated a revised Assessment of Corrective Measures (ACM) to evaluate current groundwater conditions, the nature and extent of GPS exceedances, and potential corrective measures in consideration of closure by removal activities. The ACM concludes that constituents above their GPS are not expected to pose a risk to human health or the environment and identifies several remedial options, including source removal with long term monitoring of groundwater. The ACM further notes that future studies may be necessary to validate natural recovery mechanisms and timeframes. Dominion Energy is following the Corrective Action process outlined in the CCR Rule and the VSWMR and submitted a proposed revised Corrective Action Plan to DEQ in August 2025.

SWP 440 requires semi-annual surface water monitoring as a complement to groundwater monitoring. Results of surface water monitoring in Deep Creek and the Southern Branch Elizabeth River to date have not shown exceedances of applicable standards for the constituents tested. The modified SWP 440

issued by DEQ July 31, 2026, requires development of an updated Surface Water Monitoring Plan and increased surface water monitoring on a quarterly basis.