



Post-Closure Care Plan

POST-CLOSURE CARE PLAN

Clover Power Station Stage 3 Ash Landfill

Permit #556



Submitted To: Dominion – Clover Power Station
S.R. 92
Clover, Virginia 24534

Submitted By: Golder Associates Inc.
2108 W. Laburnum Avenue
Suite 200
Richmond, VA 23227

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1. Inspection Checklist
2. Post-Closure Care Cost Estimate

1.0 PLAN CERTIFICATION

I certify that the information contained within this Post-Closure Care Plan was prepared by me or under my direct supervision, and meets the requirements of Section §257.104 of the Federal Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals (CCR) from Electric Utilities; Final Rule (40 CFR 257; the CCR rule) and the Virginia Solid Waste Management Regulations.

<u>Daniel McGrath</u>	<u>Senior Consultant</u>
Print Name	Title
<u>Daniel McGrath</u>	<u>10/7/16</u>
Signature	Date



2.0 PURPOSE

This Post-Closure Care Plan (Plan) is for the Clover Power Station Stage 3 Landfill (landfill) at the Clover Power Station (Station), Halifax County, Virginia. This Facility is a captive industrial landfill and at closure will contain approximately 8,000,000 cubic yards of Coal Combustion Residuals (CCRs).

2.1 Post-Closure Period

The required post-closure care period for this landfill is 30 years in conformance with the Federal Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule (the CCR Final Rule); 40 CFR 257.

2.2 Post-Closure Contact

The post-closure contact for this Facility will be:

Paula A. Hamel
Director, Generation Environmental Services
5000 Dominion Boulevard
Glen Allen, VA 23060
804-273-3024
paula.a.hamel@dom.com

3.0 INSPECTION, MONITORING, AND MAINTENANCE PLAN

3.1 Security Control Devices

The perimeter of the landfill and access points into the landfill will be inspected at least once per calendar month to verify the proper functioning of gates, fencing, and other perimeter security measures. Necessary repairs will be submitted into the Station's Work Notification system. Emergencies are reported immediately to the Station's environmental representative.

3.2 Final Cover Integrity

The final cover of the landfill will be inspected at least once per calendar month and after severe storms to assess the condition of the cover and identify maintenance needs. Inspection items will include:

- Erosion damage to cover, stormwater channels, or stormwater basins;
- Settlement, subsidence, or displacement of the final cover;
- Evidence of animal intrusion or burrowing;
- Bare or dead vegetative cover;
- Woody vegetation growing on final cover areas; and,
- Evidence of seeps or saturated areas.

The landfill shall be mowed at least once per growing season or more as necessary to facilitate growth of grasses on the cover, enable inspection, and preclude the establishment of woody vegetation. Application of fertilizer and/or reseeded shall take place as needed to maintain a healthy stand of vegetative cover.

3.3 Run-on and Run-off Controls

As part of the monthly or post-storm inspection, the stormwater run-off control system shall be inspected. Stormwater conveyances shall be observed for erosion damage, accumulated sediment, unusual settlement, and excessive or insufficient vegetative growth. Culverts shall be checked for blockage due to accumulated debris or sediment. Drop inlets shall be checked for debris accumulation.

Small amounts of sediment or debris shall be removed from areas if possible. Areas requiring repairs or debris removal that are beyond the inspector's capacity shall be reported to the Station's environmental representative for correction.

3.4 Repair of Erosion Damaged Areas

Areas of the cover system that have been eroded will be backfilled. The areas will be seeded, then mulched or protected with erosion control matting to deter new erosion. Adjacent areas surrounding the covered area that have been eroded will be graded to allow positive drainage, seeded, and mulched or protected with erosion control matting to deter new erosion.

3.5 Leachate Collection System

The leachate collection system shall be inspected as part of the monthly site inspection. Pump run-time meters shall be observed for change since the last inspection to identify nonworking or overworking pumps. Areas around the pump station shall be inspected for leaks. Necessary repairs will be submitted into the Station's Work Notification System.

The perimeter of the landfill will be inspected for the presence of leachate seeps. If a leachate seep is identified, the Station shall be notified to repair the seep and complete the following actions

- Take immediate action to safely contain and properly manage the leachate at the source of the seep and,
- As feasible, to minimize, control, or eliminate the seep.

Following the immediate response to the seep, an evaluation shall be made to consider if further remedial action is required.

3.6 Groundwater Monitoring System

Groundwater monitoring throughout the post-closure period shall be performed semi-annually and comply with requirements outlined in 40 CFR 257.90-98 and in the Facility's *Groundwater Monitoring Plan*. Necessary repairs will be submitted into the Station's Work Notification System.

3.7 Landfill Gas Monitoring System

CCRs by their nature are non-putrescible, and do not decompose or produce landfill gas. Gas migration and odor is not anticipated to be a concern post-closure. Therefore, no post-closure landfill gas monitoring is proposed for this Facility.

3.8 Inspection

Inspections will be performed by a Dominion employee or independent licensed engineer or other qualified person. The Closure Inspection Form, or equivalent, provided in Attachment 1 will be used to document inspections. The closed landfill will be inspected at a frequency appropriate to maintain environmental and structural integrity of the cover system.

4.0 POST-CLOSURE USES

Post-closure use of the closed unit is unknown at this time. Any post-closure use shall be in accordance with the provisions of the Virginia Solid Waste Management Regulations and the Final CCR Rule. Access to the site will be restricted. Post-closure activities will be designed and conducted so as to not disturb the integrity of the final cover, the components of any containment system, or the function of the Facility's monitoring systems.

5.0 POST-CLOSURE COST ESTIMATE

The estimated cost for 30-year post-closure care of the landfill is \$11,054,000

6.0 POST-CLOSURE CARE TERMINATION

At the end of the 30-year post-closure care period, Dominion will submit a request to terminate post-closure care in accordance with the Virginia Solid Waste Management Regulations and the Final CCR Rule.

6.1 Notification

Within 60 days of completion of post-closure care, a certification statement, signed by a licensed professional engineer, will be posted on a publicly accessible internet site, placed in the facility's operating record, and submitted to the DEQ in accordance with the Final CCR Rule.

Attachment 1

Inspection Checklist

**Attachment 1
Post-Closure Inspection Schedule
Clover Stage 3 Landfill – Permit #556**

Item	Inspection Items	Frequency of Inspection
Landfill Area	Gate and Fence Erosion of closure cover Settlement & Subsidence Deterioration of vegetative cover Trash, litter Stormwater control system Settlement (by topographic survey)	Monthly Monthly or after severe storms Monthly Monthly or after severe storms Monthly Monthly or after severe storms Annually for first five years after closure
Leachate Collection System	Leachate levels, pump operation hours / flows, manholes	Monthly
Groundwater Monitoring System	See Groundwater Monitoring Plan	See Groundwater Monitoring Plan

Attachment 2

Post-Closure Care Cost Estimate

Worksheet CEW-02: FORMAT FOR THE ESTIMATION OF POST-CLOSURE COSTS

FILL IN THE BOXES. THE REST WILL BE CALCULATED FOR YOU

I. Groundwater Monitoring

			<u>Calculation or Conversion</u>
a. Total number of monitoring wells	12	wells	
b. Total number of sampling events/year	2	events/yr	a x b 24 samples/yr
c. Quantity of additional samples (e.g. QA/QC)	1	samples/event	a x c 1 samples/yr
d. Total samples per year			b + c 25 samples/yr
e. Analysis unit cost (Table 3.1 constituents)	\$210.00	/sample	base price, ENCO Cost Sheet, VELAP Accredited
f. <i>Total Analysis cost</i>			d x e \$5,250.00 /yr
g. GW Monitoring unit cost	\$5,250.00	/event	
i. <i>Total sampling cost</i>			f + (g x b) \$15,750.00 /yr
j. Engineering fees & reports	\$7,500	/yr	
Yearly Groundwater Monitoring Cost			i + j \$23,250 /yr

II. Landfill Gas Monitoring, Maintenance, and Control

a. Frequency of LFG compliance monitoring	0	events/yr	
b. LFG Monitoring unit cost	\$549.73	/event	
c. <i>Total perimeter LFG monitoring cost</i>			a x b \$0 /yr
d. Frequency of surface monitoring (air permit)	0	events/yr	
e. Surface monitoring unit cost	\$0.00	/event	
f. <i>Total surface monitoring cost</i>			d x e \$0 /yr
g. Control system operating unit cost	\$0	/yr	
h. Frequency of LFG control system inspections	0	events/yr	
i. Control system inspection cost	\$0.00	/event	
j. <i>Total control system cost</i>			g + (h x i) \$0 /yr
Yearly Landfill Gas Monitoring, Maintenance, & Control Cost			c + f + j \$0 /yr

III. Leachate Management

a. Quantity of leachate generated	10,027,000	gal/yr	30-yr mean value, includes contact stormwater and Stage 1&
<i>On-site Leachate Management or Pre-Treatment</i>			
b. On-site treatment operating unit cost	\$0.02	/gal	On-site treatment at Mn WWTP
c. <i>Total on-site management cost</i>			a x b \$200,540 /yr
<i>Leachate Disposal</i>			
d. Private disposal unit cost	\$0.02	/gal	
e. POTW disposal unit cost	\$0.0049	/gal	
f. Direct discharge to POTW unit cost	\$0.0049	/gal	
g. Pump & Haul unit cost	\$0.08	/gal	
h. Subtotal leachate disposal unit cost			d + e + f + g \$0.00
i. <i>Total leachate disposal cost</i>			a x h \$0 /yr
j. Leachate sampling & analysis unit cost	\$2,500.00	/sample	
k. Frequency of leachate sampling & analysis	1	sample/yr	
l. <i>Total leachate sampling & analysis cost</i>			j x k \$2,500.00 /yr
Yearly Leachate Management Cost			c + i + l \$203,040 /yr

IV. Cap Maintenance & Repair

a. Closed Landfill Area	80	acres	80 Ac Stg 3 + 33 Ac Stg 1&2	
<i>Mowing & Fertilization</i>				
b. Mowing frequency	3	visits/yr		
c. Mowing unit cost	\$125.00	/acre/visit		
d. Total mowing cost			a x b x c	\$30,000 /yr
e. Fertilizer frequency	1	visits/yr		
f. Fertilizer unit cost	\$250.00	/acre/visit		
g. Total fertilizer cost			a x e x f	\$20,000 /yr
<i>Cap Erosion & Repair</i>				
h. Area to reseed/year			33% x a	26.7 acres
i. Reseeding unit cost	\$1,750.00	/acre		
j. Total reseeding cost			h x i	\$46,666.67 /yr
k. Area of cap erosion/year			10% x a	8.0 acres
l. Cap erosion repair unit cost	\$1,750.00	/acre		
m. Mobilization/Demobilization	\$250.00	/yr		
n. Total cap erosion repair cost			(k x l) + m	\$14,250 /yr
Yearly Cap Maintenance & Repair cost			d + g + j + n	\$110,917 /yr

V. Sediment Basin Maintenance & Repair

a. Sediment basin cleanout frequency, 1 per	3	years	1 / a	0.33 event/yr
b. Sediment basin cleanout unit cost	\$50,000	/event		
c. Mobilization/Demobilization	\$1,250	/event		
d. Total sediment basin maintenance cost			a x (b + c)	\$17,083 /yr
e. Total number of stormwater sampling locations	8	locations	landfill-specific outfalls	
f. Stormwater sampling frequency	1	events/yr		
g. Total number of stormwater samples			e x f	8 samples/yr
h. Analysis unit cost (VPDES permit parameters)	\$250	/sample		
i. Total Analysis cost			g x h	\$2,000 /yr
j. Mobilization unit cost	\$200.00	/event		
k. Technician field unit cost	\$1,200.00	/event		
l. Total sampling cost			f x (j + k)	\$1,400.00 /yr
m. Engineering fees & reports	\$500	/yr		
n. Total Stormwater Sampling & Analysis cost			i + l + m	\$3,900 /yr
Yearly Sediment Basin Maintenance & Repair			d + n	\$20,983 /yr

VI. Vector & Rodent Control

a. Vector and rodent control unit cost	\$0	/yr		
Yearly Vector and Rodent Control Cost			a	\$0 /yr

VII. Post-Closure Care General Inspections

a. General Inspection unit cost	\$4,500	/inspection		
b. Number of inspections per year	1			
Yearly Post-Closure Care General Inspection Cost			a x b	\$4,500 /yr

Clover Stage 3 Ash Landfill, Permit No. 556
Clover, VA

Annual Post-Closure Care Cost (APCC)		I + ... + VII	\$362,690 /yr
Length of post-closure care (LPCC)	<input type="text" value="30"/> years		
Post-Closure Care Cost		APCC x LPCC	\$10,880,700
City Cost Index (Small City)	100%=1		<input type="text" value="1"/>
Adjusted Post-Closure Care Cost (AdjPCC)			<input type="text" value="\$10,880,700.00"/>
Engineering & Documentation		Engineering Sum	\$98,673
Post-Closure Care Evaluation	<input type="text" value="\$72,538"/>	10% of Adj APCC	
Post-Closure Care Certification	<input type="text" value="\$18,135"/>	2% of Adj APCC	
Cost for survey and deed notation (if not completed at time of landfill closure)	<input type="text" value="\$8,000"/>	\$100 per acre	
FA Mechanism Maintenance Cost	<input type="text" value="\$2,500"/> /yr	FA maintenance x LPCC	\$75,000
Total Post-Closure Care Cost		Post-Closure Cost + Engineering + FA Maintenance	\$11,054,373