

Lyang, Jenghwa <jenghwa.lyang@deq.virginia.gov>

#### RE: Re: Bremo EAP CBR Certification (05-23-19)

1 message

**Dennis A Slade** <dennis.a.slade@dominionenergy.com>
To: "Lyang, Jenghwa" <jenghwa.lyang@deq.virginia.gov>
Co: "graham.simmerman@deq.virginia.gov" <graham.simmerman@deq.virginia.gov>

Mon, Sep 16, 2019 at 8:59 AM

JengHwa,

Good morning. Find my response to your comments on the Bremo East Ash Pond Closure By Removal Report included in this email.

Comment 1: The acreage of the East Ash Pond was stated as 26.5 acres in Executive Summary vs 27.2 ac in Section 3.2. Please clarify the inconsistency.

**Response 1:** The original delineated limits of the pond is approximately 26.5 acres. CCR materials discovered outside of the delineated pond limits were also visually removed and undercut, contributing to the additional acreage beyond that of the original East Ash Pond. These areas can be seen in Appendix A – Record Drawings north of Phase 4, north of Phase 5, and east of Phase 1 in the Closure By Removal report.

Comment 2: Please clarify whether or not the CCR at the toe of the East Ash Pond embankment (defined as Other Area in Section 5.3 of the Closure Plan) has been removed and, if it has, provide corresponded documentation.

**Response 2:** The CCR material identified at the toe of the East Ash Pond has been removed and inspected by Golder Associates. Attached is their report regarding the removal of material in this area.

Please let me know if there are additional comments and we will address.

Thank you,

Dennis

From: Lyang, Jenghwa [mailto:jenghwa.lyang@deq.virginia.gov]

**Sent:** Monday, August 26, 2019 2:17 PM

To: Dennis A Slade (Services - 6)

Cc: graham.simmerman@deq.virginia.gov

Subject: [External] Re: Re: Bremo EAP CBR Certification (05-23-19)

Dennis,

DEQ has completed the review of the report, Closure by Removal Construction, Bremo Power Station, East Ash Pond (VDEQ Permit No. 618), prepared by Golder Associates Inc. and dated May 23, 2019. The report was received by on July 23, 2019. DEQ's review comments are provided below.

- 1. The acreage of the East Ash Pond was stated as 26.5 acres in Executive Summary vs 27.2 ac in Section 3.2. Please clarify the inconsistency.
- 2. Please clarify whether or not the CCR at the toe of the East Ash Pond embankment (defined as Other Area in Section 5.3 of the Closure Plan) has been removed and, if it has, provide corresponded documentation.



## CLOSURE BY REMOVAL VISUAL REMOVAL

Date: August 28, 2019 Project No. 15-20347QA

Dominion Energy Bremo Power Station 1038 Bremo Road Bremo Bluff, VA 23022

RE: BREMO CLOSURE BY REMOVAL VISUAL INSPECTION AND ACCEPTANCE MEMORANDUM FOR RECORD – FORMER CSX PROPERTY

On February 26, March4, and March 5, 2019 Andrew North, P.E. with Golder Associates performed an inspection of the Former CSX Property at the Bremo Power Station to verify the removal of Coal Combustion Residuals (CCR) from within the inspected area. The inspected area consisted of the outside face of the southern berm (grids L11 through HH1) with an approximate size of 2.4 +/- acres, as shown in the attached survey. The weather conditions during the inspections were cold and partially cloudy. Please find attached the photographs taken during the inspection to document the inspected area visually absent of CCR material.

Golder Associates presents this acceptance statement for visual closure by removal of the CCR at the Bremo Power Station. This acceptance applies to the area in the Former CSX Property as described above. The area has been visually inspected and documented through field survey in accordance with the Bremo Power Station Inactive CCR Surface Impoundments Closure by Removal Plan (SWP #618). Based on visual inspection, I certify the area described above as visually absent of CCR material.

The use of the word "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.

Sincerely,

**GOLDER ASSOCIATES INC.** 

Andrew T. North, P.E. Senior Project Engineer

Attachments:

2 - "Visual Removal" Survey





#### Photo #1 Observation:

Edge of Subject Area looking southeast, showing the area where CCR has been Visually removed.



### Photo #2 Observation:

Edge of Subject Area looking southwest, showing the area where CCR has been Visually removed.





### Photo #3 Observation:

Bottom of Subject Area looking east, showing the area where CCR has been Visually removed.



### Photo #4 Observation:

Bottom of Subject Area looking northwest, showing the area where CCR has been Visually removed.





### Photo #5 Observation:

Bottom of Subject Area looking north, showing the area where CCR has been Visually removed.



### Photo #6 Observation:

Bottom of Subject Area looking northeast, showing the area where CCR has been Visually removed.





### Photo #7 Observation:

Bottom of Subject Area looking north, showing the area where CCR has been Visually removed.



## Photo #8 Observation:

Bottom of Subject Area looking west, showing the area where CCR has been Visually removed.



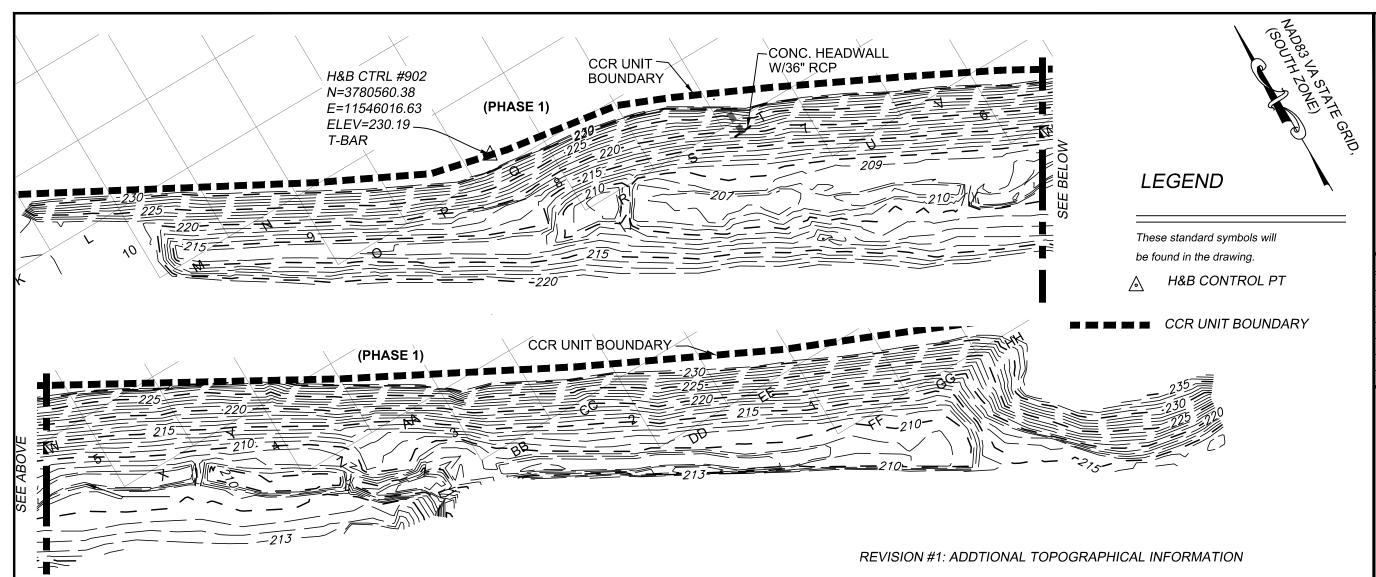




# Photo #9 Observation:

Edge of Subject Area looking west, showing the area where CCR has been Visually removed.

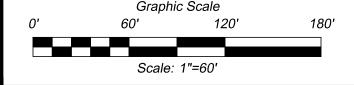




#### **NOTES:**

- EXISTING GROUND SURFACE LOCATION PERFORMED BY CONVENTIONAL INSTRUMENT SURVEY.
- THE HORIZONTAL DATUM FOR THIS SURVEY IS THE NORTH AMERICAN DATUM OF 1983 (NAD'83) AND VERTICAL DATUM (NAVD'88). COORDINATE VALUES AS SHOWN HEREON ARE ON THIS DATUM AND ARE REPORTED ON VIRGINIA STATE GRID COORDINATE SYSTEM, SOUTH ZONE. THE UNIT OF MEASURE FOR THIS SURVEY IS THE U.S. SURVEY FOOT
- UNDERGROUND UTILITIES WERE NOT DESIGNATED AS A PART OF THIS SURVEY.
- THE PROPERTY SHOWN HEREON FALLS IN THE FOLLOWING FLOOD HAZARD ZONES: "AE ELEVATION"-BASE FLOOD ELEVATIONS DETERMINED (NAVD'88). THE APPROXIMATE BOUNDARY LIMITS OF THESE AREAS ARE SHOWN GRAPHICALLY, IF THEY FALL WITHIN THE LIMITS OF THIS SURVEY, AS SCALED FROM FEMA FLOOD INSURANCE RATE MAP, MAP NUMBER 51065C0260C, EFFECTIVE MAY 16, 2008.

Sheet Status: **FINAL** Submittal Date: 03-29-2019



- NO PROPERTY LINES SHOWN ON THIS SURVEY.
- THIS SURVEY WAS COMPLETED UNDER THE DIRECT AND RESPONSIBLE CHARGE OF ALISON W. HANSON, LS FROM AN ACTUAL GROUND SURVEY MADE UNDER HER SUPERVISION. THE IMAGERY AND/OR ORIGINAL DATA WAS OBTAINED ON FEBRUARY 28, 2019 AND MARCH 29, 2019. THIS PLAT, MAP, OR DIGITAL GEOSPATIAL DATA INCLUDING METADATA MEETS MINIMUM ACCURACY STANDARDS UNLESS OTHERWISE NOTED.
- 7. SITE UNDER CONSTRUCTION AT TIME OF SURVEY.

Alison W. Hanson No. 002617

Sealed: 03-29-2019

License Expires: 01-31-2020

TOPOGRAPHIC SURVEY OF

A PORTION OF LANDS ALONG THE CSX PROPERTY SOUTH OF THE EAST ASH POND AT BREMO BLUFF POWER STATION

> FORK UNION DISTRICT, FLUVANNA COUNTY, VIRGINIA **SCALE 1"= 60"**

Job #: G01702.01 Date: 03-12-2019 1 of 1 Drawn By: RJE Checked By: AWH

Rev. #	Rev. Date
#1	03-29-19

