Poland, Jenny (DEQ)

From: Erin.L.Heath@dominionenergy.com
Sent: Friday, July 26, 2024 3:47 PM

To: Keehan, Christopher

Cc:dennis.a.slade@dominionenergy.comSubject:Dominion Energy updates for SWP 619

Attachments: Attachment III_Permit Drawings for LAP and UAP Closure_Rev 07-26-2024.pdf;

Attachment IV_Closure Plans for LAP and UAP_Rev.2_07192024.pdf; Attachment

IV_Closure Plans for LAP and UAP_Rev2_07192024_Redline.pdf

CAUTION: This Email originated from OUTSIDE of the COV. Do not open attachments or click links unless this email comes from a known sender and you know the content is safe..

Good afternoon Chris,

Here are the requested updates to the SWP 619 Closure Plan narrative for the Upper and Lower Ash Ponds along with a redline version to assist with your review. The updates in the narrative of the Closure Plans did not change anything in the Appendices of either plan, however there was an update to the permit drawings due to the changes. That update is also attached for your review.

Please let Dennis or me know if you have any questions.

Thanks, Erin

Erin Heath (she, her, hers)

Environmental Specialist III
CCR and Solid Waste Permit Support

Dominion Energy Services, Inc. 120 Tredegar Street Richmond, VA 23219 Cell (804)944-0080



Powering Your Every Day."

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Attachment III

Drawings for LAP and UAP Closure

GENERAL SITE INFORMATION

CONTACT INFORMATION

DOMINION ENERGY

CHRIS M. GEE 600 E. CANAL ST. RICHMOND, VIRGINIA 23219 PHONE: (804) 205-0527

FAX: (804) 273-2876 EMAIL: CHRIS.M.GEE@DOMINIONENERGY.COM

ENGINEER: AECOM

STEPHEN WALKER, P.E. 564 WHITE POND DRIVE AKRON, OHIO 44313 PHONE: (330) 289-4233

EMAIL: STEVE.WALKER@AECOM.COM

CHESTERFIELD POWER STATION CLOSURE PLAN - LOWER ASH POND

DOMINION ENERGY

PERMIT APPLICATION DRAWINGS

NOT FOR CONSTRUCTION CHESTERFIELD COUNTY, VIRGINIA

JULY 22, 2024

DAM DECOMMISSIONING PLAN

DAM DECOMMISSIONING CROSS SECTIONS

REVISIONS

DESCRIPTION

ADD TRD ALIGNMENT TO FINAL GRADING PLAN

REMOVE LOW PERM FILL FROM BACKFILL DETAIL

INITIALS

AMC

AMC

LAT/LONG: 37.3737°N/77.3795°W LOWER ASH POND

SOURCE: 2013 USGS VIRGINIA QUAD MAPS: CHESTER, DREWRY'S BLUFF, DUTCH GAP AND HOPEWELL

(IN FEET)

Outfall W2

VICINITY MAP

GRAPHIC SCALE

Outfall W1

6.87 7.28 8.09

Site Area (Acres)

Outfall Location (Lats/Long)

Equivalent Nitrogen Amount (lbs)

DWG DESCRIPTION COVER SHEET EXISTING CONDITIONS AND UTILITY PLAN DEMOLITION PLAN ESTIMATED BOTTOM OF CCR MATERIAL PLAN FINAL GRADING PLAN **EROSION AND SEDIMENT CONTROL PLAN** FINAL GRADING PROFILE AND CROSS SECTIONS LAYOUT PLAN FINAL GRADING PROFILES AND CROSS SECTIONS I FINAL GRADING PROFILES AND CROSS SECTIONS II PROPOSED STORMWATER STRUCTURES FINAL GRADING AND STORMWATER DETAILS

013

VSMP COMPLIANCE

WATER QUALITY COMPLIANCE IN ACCORDANCE WITH 9VAC25-870-65 IS ACHIEVED THROUGH THE CHIAP PROJECT VSMP VAR10G662.

THIS PROJECT IS COVERED UNDER THE UMBRELLA VSMP VAR10G662

PARCEL ADDRESS (AS RECORDED 701 COXENDALE ROAD IN CHESTERFIELD COUNTY GIS): CHESTER, VIRGINIA 23836 37.3737°N 77.3795°W TAX ID: 808-6612255-00000 **GPIN NUMBER:** 8086612255 OFFSITE LAND DISTURBANCE COUNTY LAND DISTURBANCE PERMIT: PERMIT IS REQUIRED FOR THIS PROJECT UMBRELLA VSMP VAR10G662 IS ALREADY IN **VIRGINIA STORMWATER** MANAGEMENT PROGRAM PERMIT (VSMP): FLOODPLAIN: FLOOD ZONE A AS DEFINED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY. FIRM PANELS 51041C0335D AND 51041C0169D EFFECTIVE DATE: DECEMBER 18, 2012. NAME OF RECEIVING WATERS VA HU6 FOUR-DIGIT WATERSHED | JL06 CODE **VA HU6 TWELVE-DIGIT** 020802060106 WATERSHED CODE EXISTING FIRE HYDRANT LOCATION SUFFICIENT FOR THIS PROJECT WETLANDS AND RPA FIELD DELINEATED BY GOLDER WETLANDS: ASSOCIATES JUNE 2018 AND BY AECOM ON MARCH

ZONING/LAND USE INFORMATION							
MAGISTERIAL DEVELOPMENT DISTRICT:	BERMUDA						
ZONING/LAND USE OF AREA IN QUESTION:	I-3 (HEAVY INDUSTRIAL)						
EXISTING ZONING/LAND USE OF WHOLE PROPERTY (PER CITIZEN GIS, 2010):	I-3 (HEAVY INDUSTRIAL)						
LAND USE (PER CITIZEN GIS 2010):	INDUSTRIAL 151 ACRES						
VPDES PERMIT NUMBER	VA0004146						
ZONING CASE(S)	15SN0647						

PERMIT NO. 2007-02441; 10-V1787 AND VIRGINIA WATER PROTECTION PERMIT NO. 10-1787. THESE PLANS MAY REQUIRE MODIFICATIONS PENDING PERMIT CONDITIONS AS REQUIRED BY FEDERAL OR STATE REVIEW AGENCIES. PERMIT CONDITIONS AMENDED TO THE PLANS SHALL BE FOLLOWED.

CBPA COMPLIANCE

WITH 9VAC 25-870-65.

A. TIDAL WETLANDS MINIMALLY IMPACTED

NON-TIDAL WETLANDS PERMITTED VIA USACE JD #NAO-2007-02441

C. TIDAL SHORES NOT IMPACTED D. VEGETATED CONSERVATION AREA WITHIN 100 FEET OF

APPLICABLE AND ADMINISTERED BY THE COUNTY.

PROPERTY LINE NOT IMPACTED

E. 100-YEAR FLOODPLAIN NOT FILLED

HIGHLY ERODIBLE SOILS OR STEEP SLOPES SHOWN ON PLANS AND PROTECTED BY EROSION AND SEDIMENT CONTROL MEASURES SHOWN IN THIS SITE PLAN

G. NO HIGHLY PERMEABLE SOILS

THE PURPOSE OF THE PROJECT IS TO COMPLY WITH THE FEDERAL CCR RULE TO PERMANENTLY CLOSE THE EXISTING CCR IMPOUNDMENT. WATER QUALITY COMPLIANCE IN ACCORDANCE

THIS PROJECT WILL HAVE A LAND DISTURBANCE GREATER THAN 2,500 S.F.; THEREFORE THE VSMP REGULATIONS FOR STORMWATER ARE

CALL MISS UTILITY BEFORE DIGGING

1-800-552-7001

PREPARED FOR:

DOMINION ENERGY (OWNER 500 COXENDALE RD CHESTER, VA 23836

PREPARED BY:

AECOM 4840 COX RD GLEN ALLEN, VA 23060

STEPHEN C WALKER Lic. No. 0402067705 Angling CWallen 6/5/24

AECOM

CHESTERFIELD POWER STATION CLOSURE PLAN - LOWER ASH POND CHESTERFIELD COUNTY, VIRGINIA

COVER SHEET

PERMIT APPLICATION DRAWINGS



	SCALE: NONE	DES: AMC
nion	DWG TYPE:.DWG	DFTR: AMC
 Y ®	JOB NO: 60614683	CHKD: RJB
	DATE: 07/22/2024	ENGR: SCW

 \mathcal{N}

APPD: SCW FILENAME: 001 COVER SHEET DEQ R2.DWG DWG SIZE DRAWING NO. REVISION ANSI D 22.0"x34.0"

31.8 10.7 9.8 15.6 39.3 Drainage Area (Acres Runoff Reduction (0 0 0 Natural Natural Natural Natural Natural N/A N/A N/A N/A Channel Protection Compliance Method Flood Protection Compliance Method N/A N/A N/A - Year | 2 - Year | 10 - Year | 1 - Year | 2 - Year | 10 - Year | 1 - Year | 2 - Year | 10 - Year | 1 - Year | 2 - Year | 10 -CN Existing N/A N/A N/A N/A N/A N/A N/A N/A N/A RV_{Existing} (AC-FT) N/A N/A N/A N/A Q_{Existing} (CFS) CN Develope RV_{Developed} (AC-FT) 5.96 11.05 3.53 4.82 1.62 3.00 1.08 1.48 2.37 8.95 41.10 71.22 25.49 12.93 30.70 18.75 Q_{Allowed} (CFS) N/A N/A N/A N/A N/A N/A N/A

7.73

4.98

5.35

W 77.3780

6.09

3.28

3.64

N 37.3755

W 77.3759

Downstream BMP

Location of storm sewer

utfalls 30 inches in diameter

4.43

3.77

Stormwater Outfall Table

117 +/-

Outfall E1

Outfall E2

Outfall E3

4.17

W 77.3752

W1, W2, E1

5.84

REV NO

DATE

8/12/2022

7/19/2024

Not computed since the existing condition was a regulated basin Location of BMP (Lat/Long) N/A Site Area (acres) 117 +/-A BMP is not needed because the TP Required Removal for the Site (lbs) load is zero following the VRRM James River BMP Service Area (list sections/phases) 20802 Total Load Removed (lbs) VAHUC6 Design Removal Efficiency (%) Offset Generating Facility MS4 Operator Dominion Virginia Power Drainage Area Used for Sizing BMP (ac) Not Required * Amount of Phosphorus Purchased (lbs) TMDL

6.90

W 77.3820

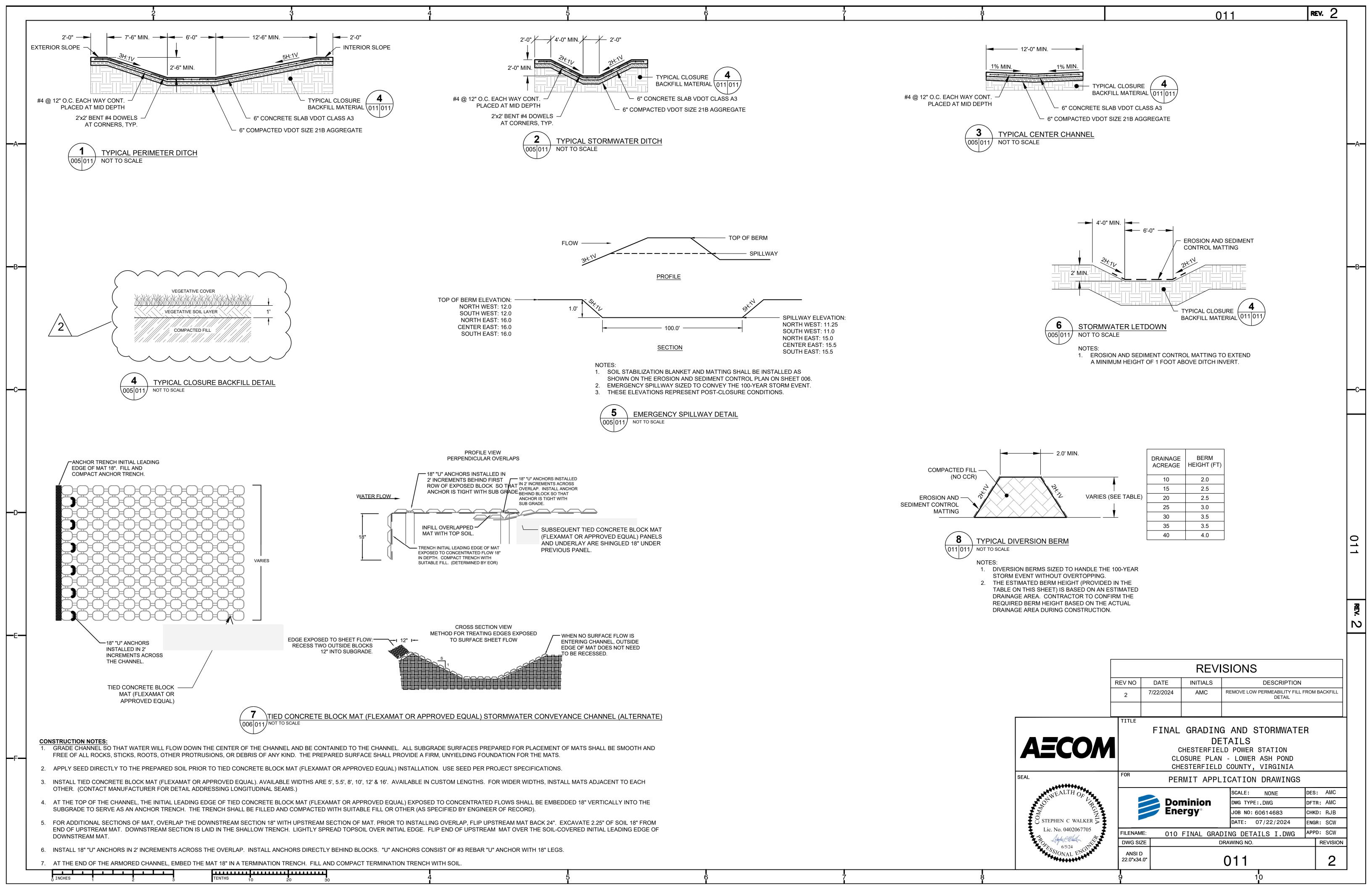
8-digit HUC of Generating Facility st The Farrar Gut is considered a category 4A water, and so a TMDL s not required because the TMDL for specific pollutant(s) is complete

6.51

Treatment Volume (cf)

Load Removed (lbs

TOTAL SITE ACREAGE: DISTURBED AREA ACREAGE:



451 COXENDALE ROAD

CHESTER, VIRGINIA 23836

37.3702°N; 77.3698°W

811-660-3332-00000

A CHESTERFIELD COUNTY LAND DISTURBANCE

PERMIT IS REQUIRED FOR THIS PROJECT

UMBRELLA VSMP VAR10G662 IS ALREADY I

FLOOD ZONE A AS DEFINED BY THE FEDERA EMERGENCY MANAGEMENT AGENCY, FIRM

PANELS 51041C0335D AND 51041C0169D. EFFECTIVE DATE: DECEMBER 18, 2012.

JAMES RIVER

GENERAL SITE INFORMATION

PARCEL ADDRESS (AS RECORDED

IN CHESTERFIELD COUNTY GIS):

LAT-LONG:

TAX ID:

GPIN NUMBER:

OFFSITE LAND DISTURBANCE

COUNTY LAND DISTURBANCE

PERMIT:

MANAGEMENT PROGRAM PERMIT

FLOODPLAIN:

NAME OF RECEIVING WATERS

VA HU6 FOUR-DIGIT WATERSHED CODE

VA HU6 TWELVE-DIGIT

WATERSHED CODE:

WETLANDS:

CONTACT INFORMATION

DOMINION ENERGY CHRIS M. GEE

600 E. CANAL STREET RICHMOND, VIRGINIA 23219 PHONE: (804) 205-0527

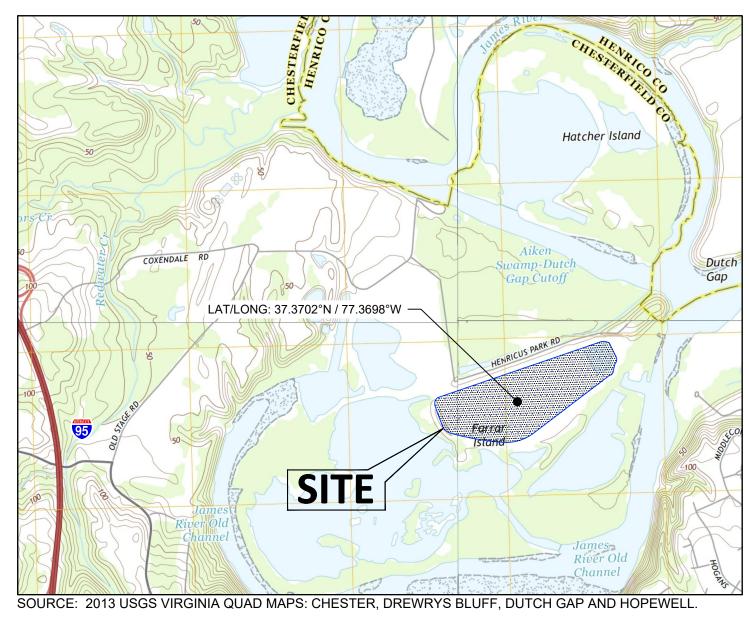
FAX: (804) 273-2876 EMAIL: CHRIS.M.GEE@DOMINIONENERGY.COM

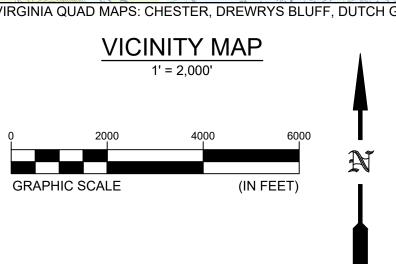
ENGINEER:

STEPHEN WALKER, P.E. 564 WHITE POND DRIVE AKRON, OHIO 44313 PHONE: (330) 289-4233 EMAIL: STEVE.WALKER@AECOM.COM

DOMINION ENERGY CHESTERFIELD POWER STATION CLOSURE PLAN - UPPER ASH POND

PERMIT APPLICATION DRAWINGS NOT FOR CONSTRUCTION CHESTERFIELD COUNTY, VIRGINIA JULY 22, 2024





DWG NO.	DWG DESCRIPTION
001	COVER SHEET
002	EXISTING CONDITIONS PLAN
003	DEMOLITION PLAN
004	ESTIMATED BOTTOM OF CCR MATERIAL PLAN
005	FINAL GRADING PLAN
006	EROSION AND SEDIMENT CONTROL PLAN
007	FINAL GRADING PROFILE AND CROSS SECTIONS PLAN LAYOUT
∧ 008	FINAL GRADING PROFILES AND CROSS SECTIONS I
1 009	FINAL GRADING PROFILES AND CROSS SECTIONS II
010	FINAL GRADING AND STORMWATER DETAILS)
011	DAM DECOMINISSIONING PLAN
012	DAM DECOMMISSIONING CROSS SECTIONS I
013	DAM DECOMMISSIONING CROSS SECTIONS II

	St	ormwate	r Outfall	Table					
Site Area (Acres)					144 +/-				
	V	est Outl	all	Middle Outfall			East Outfall		
Drainage Area (Acres)		46.6		51.8		26.4			
Runoff Reduction (CF)		_		0		0			
Receiving Channel Type	Natural		Natural		Natural				
(Natural, Restored, or Manmade)									
Channel Protection Compliance Method		N/A		N/A		N/A			
Flood Protection Compliance Method	N/A		N/A		N/A				
	1 - Year	2 - Year	10 - Year	1 - Year	2 - Year	10 - Year	1 - Year	2 - Year	10 - Year
CN Existing ¹		N/A			N/A			N/A	
$RV_{Existing}\left(AC\text{-}FT\right)^{1}$	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
$Q_{Existing}$ (CFS) 1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CN Developed		84		84		84			
RV _{Developed} (AC-FT)	5.14	6.99	12.96	5.73	7.79	14.45	2.88	3.91	7.25
Q _{Developed} (CFS)	26.94	32.1	41.99	29.93	34.85	44.28	21.12	25.45	34.21
$Q_{Allowed}$ (CFS) 1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
$V_{Developed}$ (ft/s)	5.08	6.05	7.92	5.64	6.57	8.35	4.06	4.8	6.45
Outfall Location (Lat/Long)		N 37.368 W 77.375			N 37.368 W 77.367			N 37.372 N 77.363	

144 ±

0.1 =,0					-			•		
RV _{Existing} (AC-FT) ¹	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	BMP Servi
Q _{Existing} (CFS) ¹	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
CN Developed		84	•		84	•		84		Drainage Are
V _{Developed} (AC-FT)	5.14	6.99	12.96	5.73	7.79	14.45	2.88	3.91	7.25	
Q _{Developed} (CFS)	26.94	32.1	41.99	29.93	34.85	44.28	21.12	25.45	34.21	
Q _{Allowed} (CFS) ¹	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
$V_{Developed}$ (ft/s)	5.08	6.05	7.92	5.64	6.57	8.35	4.06	4.8	6.45	
cation (Lat/Long)		N 37.368	33		N 37.368	34		N 37.372	0	
cation (Eat/ Long)	,	W 77.375	58	,	W 77.367	70	\	N 77.363	6"	
¹ Not compute	d since t	he existi	ng condit	ion was a	a regulat	ed basin.				
										Location of s
										in diameter a
										*The Farrar Gu

Stormwater Compl	iance Table		
Site Area (acres)	144 +/-		
Required Removal for the Site (lbs)	0		
Total Load Removed (lbs)	0		
Offset Generating Facility			
Amount of Phosphorus Purchased (lbs)	N/A		
Equivalent Nitrogen Amount (lbs)			
8-Digit HUC of Generating Facility	N/A		
ВМР Туре	A BMP is not needed because the TP load is zero following the VRRM		
BMP Service Area (list sections/phases)	N/A		
Design Removal Efficiency (%)	N/A		
Drainage Area Used for Sizing BMP (Acres)	N/A		
Previous Acres Treated	N/A		
Treatment Volume (CF)	N/A		
Load Removed (lbs)	N/A		
Location of BMP (Lat/Long)	N/A		
Receiving Water	James River		
VAHUC6	20802		
MS4 Operator	Dominion Virginia Power		
TMDL	Not Required*		
Downstream BMP	N/A		
Location of storm sewer outfalls 30 inches	NI/A		
in diameter and greater (excludes culverts)	N/A		

because the TMDL for specific pollutants(s) is complete

PREPARED FOR: DOMINION ENERGY (OWNER)

600 E. CANAL STREET RICHMOND, VA 23219

CALL MISS UTILITY BEFORE DIGGING

1-800-552-7001

811

		REVI	SIONS
REV NO	DATE	INITIALS	DESCRIPTION
1	7/22/2024	SCW	REMOVE LOW PERM FILL FROM BACKFILL DETAIL

PREPARED BY: **AECOM**

4840 COX RD GLEN ALLEN, VA 23060

AECOM

020802060106 **EXISTING FIRE HYDRANT LOCATION** SUFFICIENT FOR THIS PROJECT WETLANDS AND RPA FIELD DELINEATED BY **GOLDER ASSOCIATES JUNE 2018 AND BY** AECOM ON MARCH 11, 2020. ZONING/LAND USE INFORMATION

MAGISTERIAL DEVELOPMENT BERMUDA DISTRICT: ZONING/LAND USE OF AREA IN I-3 (HEAVY INDUSTRIAL) QUESTION: EXISTING ZONING/LAND USE OF WHOLE PROPERTY (PER CITIZEN I-3 (HEAVY INDUSTRIAL) GIS, 2010): **INDUSTRIAL 144 ACRES** LAND USE (PER CITIZEN GIS 2010) VPDES PERMIT NUMBER ZONING CASE(S) 10SN0114, 19SN0554, 15SN0647

VSMP COMPLIANCE WATER QUALITY COMPLIANCE IN ACCORDANCE WITH 9VAC25-870-65 IS ACHIEVED THROUGH THE CHIAP PROJECT VSMP VAR10G662.

THIS PROJECT IS COVERED UNDER THE UMBRELLA VSMP VAR10G662

CBPA COMPLIANCE

A. TIDAL WETLANDS MINIMALLY IMPACTED

B. NON-TIDAL WETLANDS PERMITTED VIA USACE JD #NAO-2007-02441 C. TIDAL SHORES NOT IMPACTED

D. VEGETATED CONSERVATION AREA WITHIN 100 FEET OF PROPERTY LINE NOT IMPACTED 100-YEAR FLOODPLAIN NOT FILLED

F. HIGHLY ERODIBLE SOILS OR STEEP SLOPES SHOWN ON PLANS AND PROTECTED BY EROSION AND SEDIMENT CONTROL MEASURES SHOWN IN THIS SITE PLAN

G. NO HIGHLY PERMEABLE SOILS

H. THE PURPOSE OF THIS PROJECT IS TO COMPLY WITH FEDERAL CCR RULE TO PERMANENTLY CLOSE EXISTING CCR IMPOUNDMENT. WATER QUALITY COMPLIANCE IN ACCORDANCE WITH 9 VAC 25-870-65.

THIS PROJECT WILL HAVE A LAND DISTURBANCE GREATER THAN 2,500 S.F.: THEREFORE THE VSMP REGULATIONS FOR STORMWATER ARE APPLICABLE AND ADMINISTERED BY THE COUNTY. | N

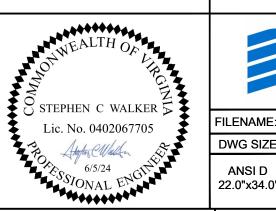
IMPACTS TO WETLAND AND OTHER WATERS OF THE U.S. ARE BEING SUBMITTED FOR APPROVAL UNDER SECTION 404 AND 401 OF THE CLEAN WATER ACT AND THE VIRGINIA TIDAL WETLANDS ACT THROUGH A PENDING MINOR PERMIT MODIFICATION REQUEST CHESTERFIELD POWER STATION FOSSIL FUEL COMBUSTION PRODUCTS MANAGEMENT FACILITY DEPARTMENT OF THE ARMY PERMIT NO. 2007-02441; 10-V1787 AND VIRGINIA WATER PROTECTION PERMIT NO. 10-1787. THESE PLANS MAY REQUIRE MODIFICATIONS PENDING PERMIT CONDITIONS AS REQUIRED BY FEDERAL OR STATE REVIEW AGENCIES. PERMIT CONDITIONS AMENDED TO THE PLANS SHALL BE FOLLOWED.



COVER SHEET

CHESTERFIELD POWER STATION CLOSURE PLAN - UPPER ASH POND CHESTERFIELD COUNTY, VIRGINIA

PERMIT APPLICATION DRAWINGS

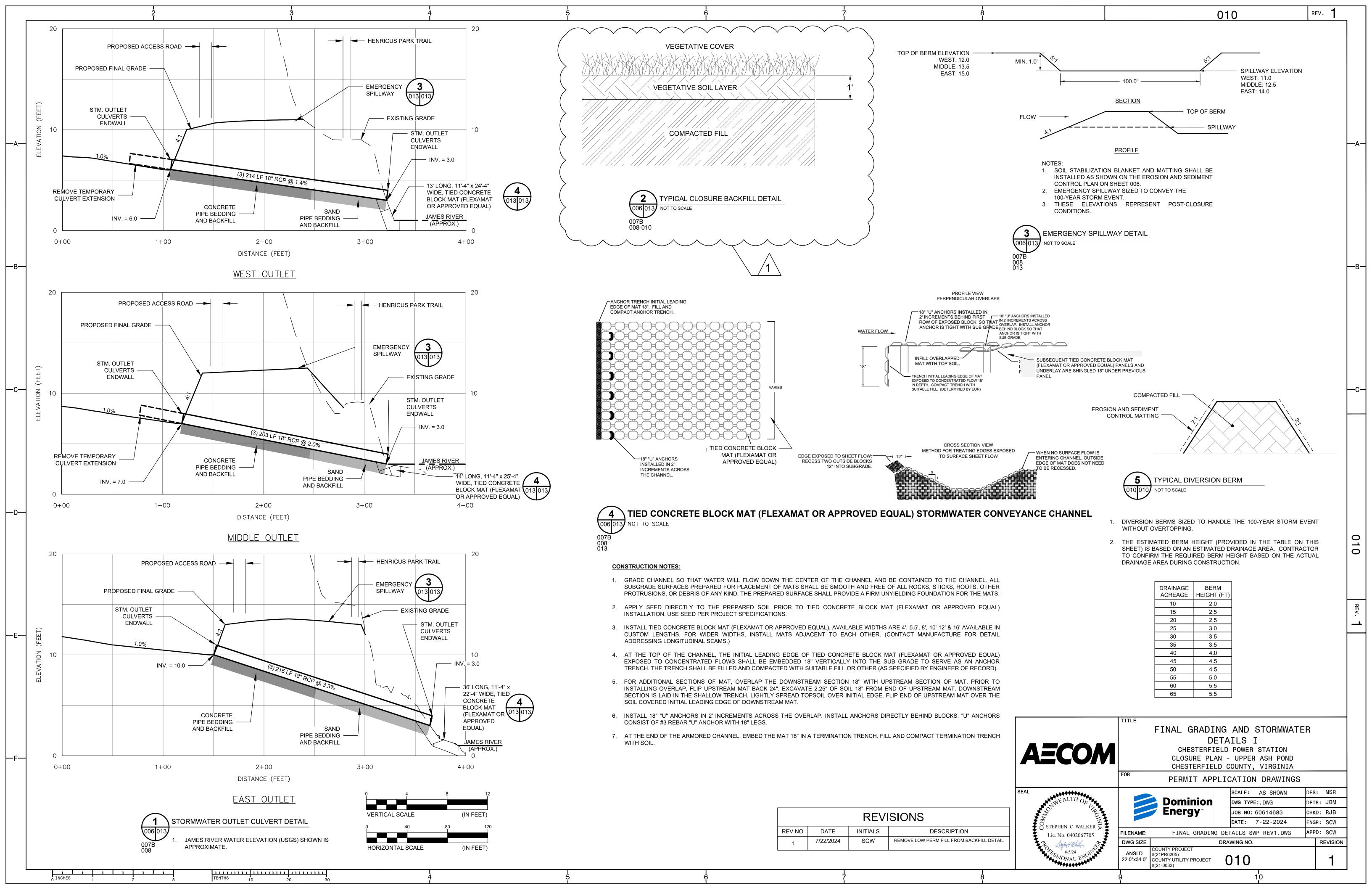


	SCALE:	AS	SHOWN	DES:	MSR	
	DWG TYPE	:.DV	VG	DFTR:	JBM	
	JOB NO: (6061	4683	CHKD:	RJB	
	DATE:	8-5-	2021	ENGR:	SCW	
EET	SWP U	4P.	DWG	APPD:	SCW	
	DATE:	8-5-	2021	ENGR:	SCW	_

COVER SHE DWG SIZE DRAWING NO. REVISION 001 22.0"x34.0" COUNTY UTILITY PROJECT

DISTURBED AREA ACREAGE: 140 ±

TOTAL SITE ACREAGE:



Attachment IV

Closure Plans for LAP and UAP

SURFACE IMPOUNDMENT CLOSURE PLAN (Rev. 2)

LOWER ASH POND CHESTERFIELD POWER STATION CHESTERFIELD COUNTY, VIRGINIA

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3.0	CLOSURE IMPLEMENTATION	3
3.1	Overview of Closure Approach	3
3.2	CCR Transportation Plan	4
3.3	Contact Water Management and Treatment	5
3.4	Erosion and Sediment and Stormwater Controls during Closure	6
4.0	CLOSURE TIMEFRAMES	6
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Table 4-1 Projected LAP Closure Timeline......7

LIST OF APPENDICES

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 Appendix C
 Appendix C
 Appendix D
 Closure Cost Estimate

Closure Plan (Rev. 2) Lower Ash Pond (LAP) Chesterfield Power Station Chesterfield County, Virginia

1.0 PLAN CERTIFICATION

This Closure Plan for the Lower Ash Pond (LAP) at the Chesterfield Power Station was prepared by AECOM. The document and Certification/Statement of Professional Opinion are based on and limited to information that AECOM has relied on from Dominion Energy Virginia and others, but not independently verified, as well as work products produced by AECOM.

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).

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.

Stephen Walker
Printed Name of Professional Engineer

0402067705 Commonwealth of Virginia License No. Atophos CWalden

STEPHEN C WALKER

07/12/2024

Signature and Date

AECOM

2.0 INTRODUCTION

Virginia Electric and Power Company d/b/a Dominion Energy Virginia (Dominion Energy) owns and operates the Chesterfield Power Station (Station) located at 500 Coxendale Road in Chesterfield County, Virginia. The Station includes two Coal Combustion Residuals (CCR) surface impoundments, as well as a Fossil Fuel Combustion Products (FFCP) Management Facility operating under Virginia Department of

Environmental Quality (VADEQ) Solid Waste Facility Permit No. 609, issued on June 29, 2016.

This Closure Plan was prepared for one of the Station's CCR surface impoundments, the Lower Ash Pond (LAP), and describes the design for closure of the LAP. A separate Closure Plan is being submitted for the other CCR surface impoundment, the Upper Ash Pond (UAP). This Closure Plan is being submitted to the VADEQ as part of a Part B Solid Waste Closure Permit Application (Permit Application). This Closure Plan was prepared in accordance with 40 CFR 257, Subpart D and is consistent with the requirements of 40 CFR 257.102 for closure of CCR surface impoundments and 9 VAC 20-81-800 of the Virginia Solid Waste Management Regulations (VSWMR). The LAP will be closed by removal pursuant to 40 CFR

257.102(c) and § 10.1-1402.03 of the Code of Virginia.

2.1 General LAP Information

As noted previously, there are three CCR units at the Station, the LAP, the UAP, and the FFCP Management Facility. This Closure Plan is for the LAP only. The LAP is a surface impoundment that was previously used by the Station to settle and manage low-volume wastewaters, including CCR. The LAP is currently

regulated under the following permits:

VADEQ Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VA0004146

• Virginia Department of Conservation and Recreation (DCR) Operation and Maintenance

Certification, Inventory No. 00823

Groundwater monitoring for the LAP will transition from the VPDES permit to a DEQ solid waste permit

upon issuance.

The LAP is approximately 111 acres in size. The estimated volume of CCR material in the LAP is approximately 2.8 million cubic yards (MCY). The LAP is constructed of earthen dikes, at approximate

Closure Plan (Rev. 2) Lower Ash Pond (LAP) Chesterfield Power Station Chesterfield County, Virginia

elevation of 18.5 feet above mean sea level (MSL). The estimated bottom of CCR material grades in the LAP are presented on LAP Drawing No. 004 (Estimated Bottom of CCR Material Plan). The maximum bottom elevation of CCR material is estimated to be approximately minus 10 feet below MSL. The estimated area of disturbance to complete the LAP closure activities is approximately 116 acres.

3.0 CLOSURE IMPLEMENTATION

3.1 Overview of Closure Approach

This Closure Plan provides for the closure of the LAP by removal of the CCR material.

Closure is considered complete under 40 CFR 257.102(c) of the CCR Rule when:

1. A Professional Engineer licensed in the Commonwealth of Virginia certifies CCR removal and decontamination, i.e., constituent removal, throughout the CCR unit and any areas affected by releases from the CCR unit; and,

2. Groundwater monitoring concentrations do not exceed the groundwater protection standards established pursuant to 40 CFR §257.95(h) for constituents listed in Appendix IV of the CCR Rule.

Closure is considered completed under The Unit's Virginia Solid Waste Permit, SWP 619, upon issuance, when:

 A Professional Engineer licensed in the Commonwealth of Virginia certifies CCR has been removed from the CCR unit and the area within the CCR unit has been over-excavated by approximately 6 inches; and,

2. The CCR 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 Rule 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 the Commonwealth of Virginia.

There is approximately 2.8 MCY of CCR material to be excavated and removed from the LAP; with allowance for over-excavation the total is approximately 2.9 MCY. All CCR material removed from the LAP will be relocated to the FFCP Management Facility, sent to an offsite permitted industrial waste landfill

Closure Plan (Rev. 2) Lower Ash Pond (LAP) Chesterfield Power Station Chesterfield County, Virginia

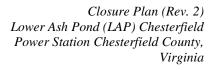
for disposal, or beneficially reused offsite. The expected storage capacity of the FFCP Management Facility is 9.36 MCY for excavated ash as well as production CCR material remaining at the Station. A combination of fill material generated from future onsite activities at the Chesterfield Power Station and soil imported from offsite will be used as backfill material to complete LAP closure and site restoration activities.

Dominion Energy is proposing a phased excavation and removal plan for the purposes of managing stormwater and CCR contact water. Once the CCR material has been removed and the LAP backfilled with soil, the LAP will be graded to promote stormwater drainage and seeded to establish cover vegetation. The final closure grades are shown on Drawing No. 005 (Final Grading Plan); profiles of the final closure grades are shown on Drawing Nos. 007 through 009, and details are provided on Drawing No. 011. The final closure grades will be established at an elevation between 10 and 15 feet above MSL around the perimeter, and then graded at 0.5% minimum upwards towards the center of the pond to approximate elevation 22 feet above MSL.

Dominion Energy's Construction Quality Assurance (CQA) representative will perform field compaction testing of the compacted and structural fill soils to verify conformance with compaction standards.

3.2 CCR Transportation Plan

Dominion Energy is planning to haul the excavated CCR from the LAP to either the Station's FFCP Management Facility or to a beneficial use loadout facility on Dominion Energy property located to the northwest of the current pond locations. The Material movement will require a rotation of trucks for CCR hauling to circulate between the LAP, the FFCP Management Facility, and the beneficial use facility for an extended duration until the project is complete. The hauling route for trucks between the LAP, the FFCP Management Facility, and the beneficial use facility involves adding truck traffic associated with the project to public roadways. Therefore, a traffic impact analysis (TIA) was performed to determine if any potential significant impacts to the existing public roadway network or projected traffic operations would result from the proposed project. A copy of the TIA is provided in Appendix A.



3.3 Contact Water Management and Treatment

Dominion Energy will ensure that contact water, including water from CCR dewatering efforts, and any other non-stormwater flows are maintained separate from non-contact stormwater during closure activities. Contact water and any other non-stormwater flows will require treatment prior to discharge. A Centralized Source Water Treatment System (CSWTS) has been constructed onsite for wastewater treatment. A Concept Engineering Report (CER) for the CSWTS was submitted to the VADEQ Water Division under the Station's existing VPDES permit and was approved by the Water Division on September 16, 2020. Treated effluent discharged from the CSWTS will meet all applicable requirements in the VPDES permit. The CSWTS is currently in operation.

For each phase of CCR excavation, Dominion Energy will install Best Management Practices (BMPs), such as lined contact water ponds, for the management of the contact water generated during CCR material excavation. Contact water ponds will be sized to contain the runoff volume from a 100-year, 24-hour storm event for the contributing drainage area (see Appendix B for calculations). Contact water ponds will be lined with 40-mil linear low-density polyethylene (LLDPE), and the liner will be anchored around the entire perimeter top of the contact water pond. For each phase, Dominion Energy will convey the contact water from the contact water pond(s) or other BMPs to a connection on the CSWTS influent pipe.

Contact water from the active excavation area will be conveyed by gravity or pumped from the active excavation area to the contact water pond(s) or other BMPs when possible. For CCR excavation below the lined pond invert, Dominion Energy will install sumps or other BMPs in each active excavation area to convey the contact water from the active excavation area to the contact water pond(s).

Dewatering of the active excavation area will also be provided to maintain safe water levels and facilitate dry excavation of the CCR material. Dominion Energy will perform dewatering and control water infiltration into the excavation area by utilizing a variety of means and methods, including rim ditching, well point systems, and installation of a low permeability cut-off wall. The cut-off wall will be installed below a seam of high transmissivity soils to limit the amount of groundwater entering the excavation area and promote *in situ* dewatering. The cut-off wall may intercept small ash deposits during installation and integrate and encapsulate them within the cementitious matrix. It is anticipated the cut-off wall will remain in place post-closure. The TRD construction drawings are included as an appendix in the Groundwater Monitoring Plan. Contact water from dewatering efforts will be conveyed to the contact water ponds or

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other storage location prior to being sent to the CSWTS for treatment. Dominion Energy will provide other means of storage or management of contact water (e.g. tanks) in addition to the contact water ponds, as needed, to ensure that the discharge flow does not exceed the design capacity of the CSWTS.

3.4 Erosion and Sediment and Stormwater Controls during Closure

Currently, non-contact stormwater within the LAP site sheet-flows to ditches draining to the existing stormwater/sedimentation basin in the western portion of the LAP site. Stormwater from this basin leaves the site through an existing VPDES outfall (066) under the Station's VPDES Construction Stormwater Permit. The existing ditches and stormwater/sedimentation basin will remain in place as the removal process starts and will only be removed once additional temporary or permanent measures are implemented.

Temporary sediment and erosion control measures will be utilized throughout all phases of closure activities. The existing stormwater/sedimentation basin in the western portion of the LAP site and the proposed, temporary stormwater/sedimentation basins shown on Drawing No. 006 (Erosion and Sediment Control Plan) will be the primary stormwater and erosion and sediment (E&S) control utilized during CCR excavation and removal. Stormwater will be conveyed to the sedimentation basins by existing drainage ditches, temporary stormwater diversion berms, and/or stormwater pumping operations. The existing LAP perimeter dam will also provide stormwater/flood control for the site, as it will be maintained at its existing condition throughout the CCR excavation and removal process.

Additional E&S controls to be installed during LAP closure activities include but are not limited to dual bay truck washes, super silt fence, and a Flexible Growth Medium (FGM) or equivalent lining for slope stabilization. Details on potential E&S controls to be installed are provided on Drawings No. 006 and 011 in Attachment III of this Permit Application package. Design calculations for the E&S and stormwater controls during closure are provided in Appendix C.

4.0 CLOSURE TIMEFRAMES

Dominion Energy is closing the LAP by excavating and removing all CCR material for disposal in the FFCP Management Facility or an offsite permitted landfill, or for beneficial reuse offsite. It is anticipated that the LAP closure activities may take approximately 13 years to complete once started.

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The projected timeframes for closure activities are provided in Table 4-1 below.

Table 4-1 Projected LAP Closure Timeline

Activity	Tentative Date
Commencement of CCR Removal/Closure Activities – LAP	2 nd Quarter 2021
Completion of Closure (CCR Removal) - LAP	NLT March 2034

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 Energy will prepare a notification of closure of the LAP within 30 days of completion of closure and will 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 the LAP will involve removing accumulated CCR such that no residual materials remain visible, followed by over-excavating the removal footprint by a minimum of six (6) inches. Removed CCR material will be transferred to the FFCP Management Facility, an offsite permitted landfill, or to the onsite Beneficial Use Building prior to transportation offsite for beneficial reuse. To facilitate effective management of stormwater and contact water, closure by removal of areas within the LAP will be achieved in phases. The phased closures will be sequenced as necessary to support traffic patterns and other constraints, including the management of stormwater and contact water during a 100-year, 24-hour design storm event. A phased approach will also allow for documentation of certified clean areas within the excavation area that are approved for soil backfill.

In environmentally-sensitive areas outside of the defined CCR unit boundary, such as Resource Protection Areas (RPAs), groundwater monitoring well locations, or wetlands, a modified excavation protocol will be followed for removal of identified CCR. The CCR will be removed to a visually clean condition using methods that minimize impact to surrounding soils. The 6-inch over-excavation will not be performed in these areas in order to limit the impact to subgrade soils. Following CCR removal, the area will be stabilized

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to prevent erosion with materials suitable for the area.

After CCR removal and certification, the LAP will be graded to promote stormwater drainage to the site's permitted stormwater outfalls. Vegetative stabilization will be established to prevent erosion. The area will be maintained as a grassy open area.

5.2 Sampling and Testing Program

After removal of the CCR material and the 6-inch over-excavation material from the LAP, the area will be visually inspected to verify the CCR removal and over-excavation has been achieved. In addition, the LAP will be further inspected by targeted soil cores, dug by hand using a hand auger or similar tool, to a depth of at least six (6) inches at a frequency of at least one core per acre.

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 VSWMR.

5.3 Other Areas

A 10-inch diameter water main and a fiber optic cable currently run beneath Coxendale Road and Henricus Park Road along the northern and eastern boundaries of the LAP. It is possible that CCR material may be found beneath the pavement or that the existing utilities may be located within the limits of CCR. If this occurs, Dominion Energy will expose the utility by hand-digging, ensure the utility is appropriately supported, and carefully remove any CCR material in the vicinity of the utility within the waste unit boundary.

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6.0 FINAL CLOSURE AND POST-CLOSURE IMPLEMENTATION

6.1 Post-Closure Stormwater Controls

The LAP post-closure stormwater controls are shown on Drawing No. 005 (Final Grading Plan) in Attachment III of this Permit Application package. A concrete perimeter drainage ditch will be constructed around the LAP, and a concrete stormwater ditch will be constructed along Coxendale Road and Henricus Park Road, to convey stormwater runoff from the closure area to proposed stormwater outfalls in the closure area. The western stormwater outfalls will discharge to the Station's Thermal Channel to the west. The eastern stormwater outfalls will discharge to Aiken Swamp in the Dutch Gap Conservation Area. A gravel-

surfaced perimeter access road will also be constructed around the LAP closure area. Design calculations

for the post-closure stormwater controls are included in Appendix C.

6.2 Dam Modification

Dominion Energy will request approval to lower and then decommission the existing dam around the western, southern, and eastern sides of the LAP closure area. Plans and details for the proposed dam modification are provided on Drawing Nos. 012 and 013 in Attachment III of this Permit Application package. Therefore,

once the LAP is closed, the LAP will no longer be regulated as an impounding structure by DCR.

6.3 Sign Posting

As the LAP is closing by removal, there is no requirement to post a sign prohibiting further disposal of

waste as indicated in 9VAC20-81-160 D(5)(a).

6.4 Land Instruments

As the LAP is closing by removal, there is no requirement to submit a survey plat to the local land recording

authority under 9VAC20-81-160 D(5)(b) or record a notation to the deed under 9VAC20-81-160 D(5)(c) and

40 CFR §257.102(i).

6.5 Certification

Within 30 days of closure completion under 40 CFR §257.102(c), a certification statement by a Professional

Engineer licensed in the Commonwealth of Virginia will be placed in the operating record and posted on

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Dominion Energy's publicly accessible website. The certification statement should generally read as

follows:

I certify that the closure of the [Pond] at the Chesterfield Power Station has been completed in

accordance with the Closure Plan [Date on the Closure Plan or most recent amendment] and

the requirements of 40 CFR §257.102(c).

Within 30 days of closure completion under the Unit's Virginia Solid Waste Permit (SWP 619) a

certification statement by a Professional Engineer licensed in the Commonwealth of Virginia will be

provided to the DEQ along with supporting documentation as required by this Plan. The certification

statement should generally read as follows:

I certify that closure of the [Pond] at the Chesterfield Power Station has been completed in

accordance with the Closure Plan [Date on the Closure Plan or most recent amendment] for

solid waste permit number 619 issued to Dominion Energy, with the exception of the following

discrepancies: [To Be Determined]

[Signature, date, and stamp of Professional Engineer]

The certification will be posted on Dominion Energy's publicly accessible internet site and placed in the

operating record.

6.6 **Post-Closure Use**

Currently, there are no dedicated proposed land use plans for this area. A gravel-surfaced perimeter access

road will be constructed around the LAP closure area. The former LAP area will be allowed to revegetate

and return to a grassy open area.

7.0 **CLOSURE COST ESTIMATE**

The LAP closure cost estimate is estimated to be approximately \$204,000,000. The estimate includes the

cost of all closure construction activities, as well as costs for inspection, testing, and certification as

proposed in this Plan. See Appendix D for the Closure Cost Estimate.

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December 2020 August 2022 (Rev. 1)

July 2024 (Rev. 2)



SURFACE IMPOUNDMENT CLOSURE PLAN (REV. 2) UPPER ASH POND CHESTERFIELD POWER STATION CHESTERFIELD COUNTY, VIRGINIA

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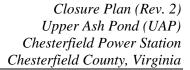
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1.0 PLAN CERTIFICATION

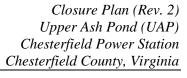
This Closure Plan for the Upper Ash Pond (UAP) at the Chesterfield Power Station was prepared by AECOM. The document and Certification/Statement of Professional Opinion are based on and limited to information that AECOM has relied on from Dominion Energy and others, but not independently verified, as well as work products produced by AECOM.

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).

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.

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<u>Stephen Walker</u> Printed Name of Professional Engineer	STEPHEN C WALKER S Lic. No. 0402067705 FOR THE STONAL ENGINEER T112124 STONAL ENGINEER		
0402067705	Angley CWhile	7/12/2024	
Commonwealth of Virginia License No.	Signature and Date	7/12/2024	
	1		



2.0 INTRODUCTION

Virginia Electric and Power Company d/b/a Dominion Energy Virginia (Dominion Energy) owns and operates the Chesterfield Power Station (Station) located at 500 Coxendale Road in Chesterfield County, Virginia. The Station includes two Coal Combustion Residuals (CCR) surface impoundments, as well as a Fossil Fuel Combustion Products (FFCP) Management Facility operating under Virginia Department of Environmental Quality (VADEQ) Solid Waste Facility Permit No. 609, issued on June 29, 2016.

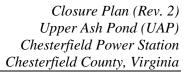
This Closure Plan was prepared for one of the Station's CCR surface impoundments, the Upper Ash Pond (UAP), and describes the design for closure of the UAP. A separate Closure Plan is being submitted for the other CCR surface impoundment, the Lower Ash Pond (LAP). This Closure Plan is being submitted to VADEQ as part of a Part B Solid Waste Closure Permit Application (Permit Application). This Closure Plan was prepared in accordance with 40 CFR 257, Subpart D and is consistent with the requirements of 40 CFR 257.102 for closure of CCR surface impoundments and 9 VAC 20-81-800 of the Virginia Solid Waste Management Regulations (VSWMR). The UAP will be closed by removal pursuant to 40 CFR 257.102(c) and § 10.1-1402.03 of the Code of Virginia.

2.1 General UAP Information

As noted previously, there are three CCR units at the Station, the UAP, the LAP, and the FFCP Management Facility. This Closure Plan is for the UAP only. The UAP is a surface impoundment that was used by the Station to store CCR material. The UAP is currently regulated under the following permits:

- VADEQ Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VA0004146
- Virginia Department of Conservation and Recreation (DCR) Operation and Maintenance Certification, Inventory No. 04145

Groundwater monitoring for the UAP will transition from the VPDES permit to DEQ solid waste permit upon issuance.



The UAP is approximately 113 acres in size. The estimated volume of CCR material in the UAP is approximately 11.8 million cubic yards (MCY). The UAP is constructed of earthen dikes, with a 20-foot minimum crest width at approximate elevation of 40 feet above mean sea level (MSL). The estimated bottom of CCR material grades in the UAP are presented on Drawing No. 004 (Estimated Bottom of CCR Material Plan). The maximum bottom elevation level of CCR material in the UAP is estimated to be minus 12 feet below MSL. The estimated area of disturbance to complete the UAP closure activities is 140 acres.

3.0 CLOSURE IMPLEMENTATION

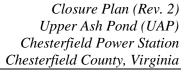
3.1 Overview of Closure Approach

This Closure Plan provides for the closure of the UAP by removal of the CCR material. Closure is considered complete under 40 CFR 257.102(c) of the CCR Rule when:

- A Professional Engineer licensed in the Commonwealth of Virginia certifies CCR removal and decontamination, i.e., constituent concentration removal, throughout the CCR unit and any areas affected by releases from the CCR unit; and,
- 2. Groundwater monitoring concentrations do not exceed the groundwater protection standards established pursuant to 40 CFR §257.95(h) for constituents listed in Appendix IV of the CCR Rule.

Closure is considered complete under the Unit's Virginia Solid Waste Permit, SWP 619, upon issuance when:

- A Professional Engineer licensed in the Commonwealth of Virginia certifies CCR has been removed from the CCR unit and the area within the CCR unit has been over-excavated by approximately 6 inches; and,
- 2. The CCR 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 Rule 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 the Commonwealth of Virginia.

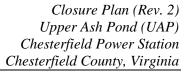
There is approximately 11.8 MCY of CCR material to be excavated and removed from the UAP. All CCR material removed from the UAP will be relocated to the Station's FFCP Management Facility, transported to an offsite permitted industrial waste landfill for disposal, or beneficially reused offsite. The expected storage capacity of the FFCP Management Facility is 9.36 MCY for excavated ash as well as production CCR material remaining at the Station. A combination of fill material generated from future onsite activities at the Chesterfield Power Station and soil imported from offsite will be used as backfill material to complete the UAP closure and site restoration activities.

Dominion Energy is proposing a phased excavation and removal plans for the purposes of managing stormwater and CCR contact water. Once the CCR material has been removed and the UAP backfilled with soil, the UAP will be graded to promote stormwater drainage and seeded to establish cover vegetation. The final closure grades are shown on Drawing No. 005 (Final Grading Plan); profiles of the final closure grades are shown on Drawing Nos. 007 through 009 and details are provided on Drawing No. 010. The final closure grades will be established at an elevation between 10 and 23 feet above MSL around the perimeter, and then graded at 0.5% minimum upwards towards the northern portion of the pond to approximate elevation 23 feet above MSL.

Dominion Energy's Construction Quality Assurance (CQA) representative will perform field compaction testing of the compacted and structural fill soil to verify conformance with the compaction standards.

3.2 CCR Transportation Plan

Dominion Energy is planning to haul the excavated CCR from the UAP to the Station's FFCP Management Facility or to a beneficial use loadout facility on Dominion Energy property located to the northwest of the current pond locations. Material movement will require a rotation of trucks for CCR hauling to circulate between the UAP, the FFCP Management Facility, and the beneficial use facility for an extended duration until the project is complete. The hauling route for trucks between the UAP, the FFCP Management Facility, and the beneficial use facility involves adding truck traffic associated with the project to public roadways.



Therefore, a traffic impact analysis (TIA) was performed to determine if any potential significant impacts to the existing public roadway network or projected traffic operations would result from the proposed project. A copy of the TIA is provided in Appendix A.

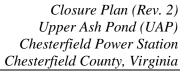
3.3 Contact Water Management and Treatment

Dominion Energy will ensure that contact water, including water from dewatering efforts, and any other non-stormwater flows are maintained separate from non-contact stormwater during closure activities. Contact water and any other non-stormwater flows will require treatment prior to discharge. A Centralized Source Water Treatment System (CSWTS) has been constructed onsite for wastewater treatment. A Concept Engineering Report (CER) for the CSWTS was submitted to the VADEQ Water Division under the Station's existing VPDES permit and was approved by the Water Division on September 16, 2020. Treated effluent discharged from the CSWTS will meet all applicable requirements in the VPDES permit. The CSWTS is currently in operation.

For each phase of CCR excavation and removal, Dominion Energy will install Best Management Practices (BMPs), such as lined contact water ponds, for the management of the contact water generated during CCR material excavation. Contact water ponds will be sized to contain the runoff volume from a 100-year, 24-hour storm event for the contributing drainage area (see Appendix B for calculations). Contact water ponds will be lined with 40-mil linear low-density polyethylene (LLDPE), and the liner will be anchored around the entire perimeter top of the contact water pond. For each phase, Dominion Energy will convey the contact water from the contact water pond(s) or other BMPs to a connection on the CSWTS influent pipe.

Contact water from the active excavation area will be conveyed by gravity or pumped from the active excavation area to the contact water pond(s) or other BMPs when possible. For CCR excavation below the lined pond invert, Dominion Energy will construct sumps or other BMPs in each active excavation area to convey the contact water from the active excavation area to the contact water pond(s).

Dewatering of the active excavation area will also be provided to maintain safe water levels and facilitate dry excavation of the CCR material. Contact water from dewatering efforts will be conveyed to the contact water ponds or other storage location prior to being sent to the CSWTS for treatment. Dominion Energy



will provide other means of storage or management of contact water (e.g. tanks) in addition to the contact water ponds, as needed, to ensure that the discharge flow does not exceed the design capacity of the CSWTS.

3.4 Erosion and Sediment and Stormwater Controls during Closure

Currently, non-contact stormwater within the UAP site sheet-flows from the top of the impoundment to the existing let-downs along the side slopes that discharge into ditches draining to the existing stormwater/sedimentation basin in the eastern portion of the UAP site. Stormwater from this basin leaves the site through an existing VPDES outfall (005) under the Station's VPDES permit. The existing ditches and stormwater/sedimentation basin will remain in place as the removal process starts and will only be removed once additional temporary or permanent measures are implemented.

Temporary sediment and erosion control measures will be utilized throughout all phases of closure activities. The existing stormwater/sedimentation basin in the eastern portion of the UAP site and the proposed, temporary stormwater/sedimentation basins shown on Drawing No. 006 (Erosion and Sediment Control Plan) will be the primary stormwater and erosion and sediment (E&S) control utilized during CCR excavation and removal. Stormwater will be conveyed to the sedimentation basins by existing drainage ditches, temporary stormwater diversion berms, and/or by stormwater pumping operations. The existing UAP perimeter dam will also provide stormwater/flood control for the site, as it will be maintained at its existing condition through the CCR excavation and removal process. Once the new sedimentation basins and outlets are operational, existing VPDES outfall 005 will be removed from service, prior to the excavation portion of this phase of work.

Additional E&S controls to be installed during UAP closure activities include but are not limited to dual bay truck washes, super silt fence, and a Flexible Growth Medium (FGM) or equivalent lining for slope stabilization. Locations and details are provided on Drawing Nos. 006 and 010 in Attachment III of the Permit Application package. Design calculations for the E&S and stormwater controls during closure are provided in Appendix C.



4.0 CLOSURE TIMEFRAMES

Dominion Energy is closing the UAP by excavating and removing all CCR material for disposal in the FFCP Management Facility or an offsite permitted landfill, or for beneficial reuse offsite. It is anticipated that the UAP closure activities may take approximately 13 years to complete once started.

The projected timeframes for closure activities are provided in Table 4-1 below.

Table 4-1 Projected UAP Closure Timeline

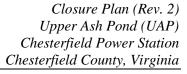
Activity	Tentative Date
Commencement of CCR Removal/Closure Activities - UAP	2 nd Quarter 2021
Completion of Closure (CCR Removal) - UAP	NLT April 2034

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 Energy will prepare a notification of closure of the UAP within 30 days of completion of closure and will 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 the UAP will involve removing accumulated CCR such that no residual materials remain visible, followed by over-excavating the removal footprint by a minimum of six (6) inches. Removed CCR material will be transferred to the FFCP Management Facility, an offsite permitted landfill, or to the onsite Beneficial Use Building prior to transportation offsite for beneficial reuse. To facilitate effective management of stormwater and contact water, closure by removal of areas within the UAP will be achieved in phases. The phased closures will be sequenced as necessary to support traffic patterns and other constraints, including the management of stormwater and contact water during a 100-



year, 24-hour design storm event. A phased approach will also allow for documentation of certified clean areas within the excavation area that are approved for soil backfill.

In environmentally-sensitive areas outside of the defined CCR unit boundary, such as Resource Protection Areas (RPAs), groundwater monitoring well locations, or wetlands, a modified excavation protocol will be followed for removal of any identified CCR. The CCR will be removed to a visually clean condition using methods that minimize impact to surrounding soils. Following CCR removal, the area will be stabilized to prevent erosion with materials suitable for the area.

After CCR removal and certification, the UAP will be graded to promote stormwater drainage to the site's permitted stormwater outfalls. Vegetative stabilization will be established to prevent erosion. The area will be maintained as a grassy open area.

5.2 Sampling and Testing Program

After removal of the CCR material and the 6-inch over-excavation material from the UAP, the area will be visually inspected to verify the CCR removal and over-excavation has been achieved. In addition, the UAP will be further inspected by targeted soil cores, dug by hand using a hand auger or similar tool, to a depth of at least six (6) inches at a frequency of at least one core per acre.

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 VSWMR.

5.3 Other Areas

Aboveground and underground electric utilities currently run along the northern boundary of the UAP along Henricus Park Road. It is possible that CCR material may be found beneath the ground surface or that the

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existing utilities may be located within the limits of CCR in some locations. If this occurs, Dominion Energy will expose the utility by hand-digging, ensure the utility is appropriately supported, and carefully remove any CCR material in the vicinity of the utility within the waste unit boundary.

6.0 FINAL CLOSURE AND POST-CLOSURE IMPLEMENTATION

6.1 Post-Closure Stormwater Controls

The UAP post-closure stormwater controls are shown on Drawing No. 005 (Final Grading Plan) in Attachment III of the Permit Application package. Several tied concrete block mat-lined stormwater conveyance channels will direct stormwater runoff from the closure area to proposed stormwater outfalls in the closure area. The west outlet and emergency spillway will discharge to the Dutch Gap Conservation Area. The middle (southern) and east outlets and emergency spillways will discharge to the Old Channel of the James River. Design calculations for the post-closure stormwater controls are included in Appendix C.

6.2 Dam Modification

Dominion Energy will request approval to lower and then decommission the existing dam around the western, southern, and eastern sides of the UAP closure area. Plan and details of the proposed dam modification are provided on Drawing Nos. 011 through 013 in Attachment III of the Permit Application package. Therefore, once the UAP is closed, the UAP will no longer be regulated as an impounding structure by DCR.

6.3 Sign Posting

As the UAP is closing by removal, there is no requirement to post a sign prohibiting further disposal of waste as indicated in 9VAC20-81-160 D(5)(a).

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6.4 Land Instruments

As the UAP is closing by removal, there is no requirement to submit a survey plat to the local land recording authority under 9VAC20-81-160 D(5)(b) or record a notation to the deed under 9VAC20-81-160 D(5)(c)

and 40 CFR §257.102(i).

6.5 Certification

Within 30 days of closure completion under 40 CFR §257.102(c), a certification statement by a

Professional Engineer licensed in the Commonwealth of Virginia will be placed in the operating record

and posted on Dominion Energy's publicly accessible website. The certification statement should

generally read as follows:

I certify that the closure of the [Pond] at the Chesterfield Power Station has been completed

in accordance with the Closure Plan [Date on the Closure Plan or most recent amendment]

and the requirements of 40 CFR §257.102(c).

Within 30 days of closure completion under the Unit's Virginia Solid Waste Permit (SWP 619) a

certification statement by a Professional Engineer licensed in the Commonwealth of Virginia will be

provided to the DEQ along with supporting documentation as required by this Plan. The certification

statement should generally read as follows:

I certify that closure of the [Pond] at the Chesterfield Power Station has been completed in

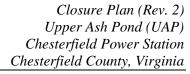
accordance with the Closure Plan [Date on the Closure Plan or most recent amendment] for

solid waste permit number 619 issued to Dominion Energy, with the exception of the following

discrepancies: [To Be Determined]

[Signature, date, and stamp of Professional Engineer]

10



The certification will be posted on Dominion Energy's publicly accessible internet site and placed in the operating record.

6.6 Post-Closure Use

There are currently no proposed dedicated land uses for this area. A gravel-surfaced perimeter access road will be constructed around the UAP closure area. The existing Henricus Park hiking trail along the southern perimeter of the UAP will be reconstructed as needed at the completion of closure activities. The former UAP area will be allowed to revegetate and return to a grassy open area.

7.0 CLOSURE COST ESTIMATE

The UAP closure cost estimate is estimated to be approximately \$480,000,000. The estimate includes the cost of all closure construction activities, as well as costs for inspection, testing, and certification as proposed in this Closure Plan. See Appendix D for the Closure Cost Estimate.

SURFACE IMPOUNDMENT CLOSURE PLAN (Rev. 1)2)

LOWER ASH POND CHESTERFIELD POWER STATION CHESTERFIELD COUNTY, VIRGINIA

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Lower Ash Pond (LAP) Chesterfield
Power Station Chesterfield County,
Virginia

1.0 PLAN CERTIFICATION

This Closure Plan for the Lower Ash Pond (LAP) at the Chesterfield Power Station was prepared by AECOM. The document and Certification/Statement of Professional Opinion are based on and limited to information that AECOM has relied on from Dominion Energy Virginia and others, but not independently verified, as well as work products produced by AECOM.

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).

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.

	ON THE WAY
Gabriel Lang	STEPHEN C WALKER \$\frac{1}{5} \\ Lic. No. 0402067705
Stephen Walker Printed Name of Professional Engineer	Aught Children (17) 17/12/24 SSONAL ENGINE
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Closure Plan (Rev. 1)
Lower Ash Pond (LAP) Chesterfield
Power Station Chesterfield County,
Virginia

Commonwealth of Virginia License No.

Signature and Date

<u>Closure Plan (Rev. 1)</u> <u>Lower Ash Pond (LAP) Chesterfield</u> <u>Power Station Chesterfield County,</u> <u>Virginia</u>



2.0 INTRODUCTION

Virginia Electric and Power Company d/b/a Dominion Energy Virginia (Dominion Energy) owns and operates the Chesterfield Power Station (Station) located at 500 Coxendale Road in Chesterfield County, Virginia. The Station includes two Coal Combustion Residuals (CCR) surface impoundments, as well as a Fossil Fuel Combustion Products (FFCP) Management Facility operating under Virginia Department of Environmental Quality (VADEQ) Solid Waste Facility Permit No. 609, issued on June 29, 2016.

This Closure Plan was prepared for one of the Station's CCR surface impoundments, the Lower Ash Pond (LAP), and describes the design for closure of the LAP. A separate Closure Plan is being submitted for the other CCR surface impoundment, the Upper Ash Pond (UAP). This Closure Plan is being submitted to the VADEQ as part of a Part B Solid Waste Closure Permit Application (Permit Application). This Closure Plan was prepared in accordance with 40 CFR 257, Subpart D and is consistent with the requirements of 40 CFR 257.102 for closure of CCR surface impoundments and 9 VAC 20-81-800 of the Virginia Solid Waste Management Regulations (VSWMR). The LAP will be closed by removal pursuant to 40 CFR 257.102(c) and § 10.1-1402.03 of the Code of Virginia.

2.1 General LAP Information

As noted previously, there are three CCR units at the Station, the LAP, the UAP, and the FFCP Management Facility. This Closure Plan is for the LAP only. The LAP is a surface impoundment that was previously used by the Station to settle and manage low-volume wastewaters, including CCR. The LAP is currently regulated under the following permits:

- VADEQ Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VA0004146
- Virginia Department of Conservation and Recreation (DCR) Operation and Maintenance Certification, Inventory No. 00823

Groundwater monitoring for the LAP will transition from the VPDES permit to a DEQ solid waste permit upon issuance.

The LAP is approximately 111 acres in size. The estimated volume of CCR material in the LAP is approximately 2.8 million cubic yards (MCY). The LAP is constructed of earthen dikes, at approximate



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elevation of 18.5 feet above mean sea level (MSL). The estimated bottom of CCR material grades in the LAP are presented on LAP Drawing No. 004 (Estimated Bottom of CCR Material Plan). The maximum bottom elevation of CCR material is estimated to be approximately minus 10 feet below MSL. The estimated area of disturbance to complete the LAP closure activities is approximately 116 acres.

3.0 CLOSURE IMPLEMENTATION

3.1 Overview of Closure Approach

This Closure Plan provides for the closure of the LAP by removal of the CCR material. Closure is considered complete under 40 CFR 257.102 and 9 VAC 20-81-810 when:

Closure is considered complete under 40 CFR 257.102(c) of the CCR Rule when:

- A Professional Engineer licensed in the Commonwealth of Virginia certifies all CCR removal and decontamination, i.e., constituent removal, throughout the CCR unit and any areas affected by releases from the CCR unit; and,
- 2. Groundwater monitoring concentrations do not exceed the groundwater protection standards established pursuant to 40 CFR §257.95(h) for constituents listed in Appendix IV of the CCR Rule.

Closure is considered completed under The Unit's Virginia Solid Waste Permit, SWP 619, upon issuance, when:

- A Professional Engineer licensed in the Commonwealth of Virginia certifies CCR has been removed from the LAP. In addition, consistent with its other closure by removal projects in Virginia, Dominion will over-excavate the visually clean certified CCR unit and the area within the CCR unit has been over-excavated by a minimum of six (approximately 6) inches of underlying material.; and,
- 2. The LAP's CCR 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 Rule Appendix IV constituent on or after a minimum of ten sampling events have occurred after CCR material has been verified as removed by a Professional Engineer licensed in the Commonwealth of Virginia.



There is approximately 2.8 MCY of CCR material to be excavated and removed from the LAP; with allowance for over-excavation the total is approximately 2.9 MCY. All CCR material removed from the LAP will be relocated to the FFCP Management Facility or, sent to an offsite permitted industrial waste landfill for disposal, or beneficially reused offsite. The expected storage capacity of the FFCP Management Facility is 9.36 MCY for excavatedashexcavated ash as well as production CCR material anticipated from ongoing and futureremaining at the Station operations. A combination of fill material generated from future onsite activities at the Chesterfield Power Station and soil imported from offsite will be used as backfill material to complete LAP closure and site restoration activities.

Dominion Energy is proposing a phased excavation and removal plan for the purposes of managing stormwater and CCR contact water. Once the CCR material has been removed and the LAP backfilled with soil, the LAP will be graded to promote stormwater drainage and seeded to establish cover vegetation. The final closure grades are shown on Drawing No. 005 (Final Grading Plan); profiles of the final closure grades are shown on Drawing Nos. 007 through 009, and details are provided on Drawing No. 011. The final closure grades will be established at an elevation between 10 and 15 feet above MSL around the perimeter, and then graded at 0.5% minimum upwards towards the center of the pond to approximate

- Minimum 1-foot vegetative soil layer;
- Approximately 3 feet of low permeability fill soil (k < 1 x 10-5 cm/sec); and,
- Compacted fill soil, at least 6 inches below the bottom elevation of the CCR material.

elevation 22 feet above MSL. The closure area will consist of the following from top to bottom:

Dominion's Dominion Energy's Construction Quality Assurance (CQA) representative will perform field compaction testing of the compacted, low permeability, and structural fill soils to verify conformance with compaction standards.

After vegetative soil layer placement is completed, Dominion will apply seed, fertilizer, lime, and mulch, in accordance with the VADEQ Erosion & Sediment Control Handbook (VESCH), to achieve a permanent vegetative cover over the closure area.

3.2 CCR Transportation Plan



<u>Closure Plan (Rev. 1)</u> Lower Ash Pond (LAP) Chesterfield Power Station Chesterfield County, Virginia

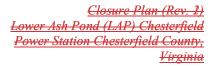
Dominion Energy is planning to haul the excavated CCR from the LAP to either the Station's FFCP Management Facility or to a beneficial use loadout facility on Dominion Energy property located to the northwest of the current pond locations. This The Material movement will require a rotation of trucks for CCR hauling to circulate between the LAP, the FFCP Management Facility, and the beneficial use facility for an extended duration until the project is complete. The hauling route for trucks between the LAP, the FFCP Management Facility, and the beneficial use facility involves adding truck traffic associated with the project to public roadways. Therefore, a traffic impact analysis (TIA) was performed to determine if any potential significant impacts to the existing public roadway network or projected traffic operations would result from the proposed project. A copy of the TIA is provided in Appendix A.

3.3 Contact Water Management and Treatment

Dominion Energy will ensure that contact water, including water from CCR dewatering efforts, and any other non-stormwater flows are keptmaintained separate from non-contact stormwater at all times during closure activities. Contact water and any other non-stormwater flows will require treatment prior to discharge. A Centralized Source Water Treatment System (CSWTS) will behas been constructed onsite for wastewater treatment. A Concept Engineering Report (CER) for the CSWTS was submitted to the VADEQ Water Division under the Station's existing VPDES permit and was approved by the Water Division on September 16, 2020. Treated effluent discharged from the CSWTS will meet all applicable requirements in the VPDES permit. The CSWTS is currently in operation.

For each phase of CCR excavation, Dominion Energy will install Best Management Practices (BMPs), such as lined contact water ponds, for the management of the contact water generated during CCR material excavation. Contact water ponds will be sized to contain the runoff volume from a 100-year, 24-hour storm event for the contributing drainage area (see Appendix B for calculations). Contact water ponds will be lined with 40-mil linear low-density polyethylene (LLDPE), and the liner will be anchored around the entire perimeter top of the contact water pond. For each phase, Dominion Energy will convey the contact water from the contact water pond(s) or other BMPs to a connection on the CSWTS influent pipe.

Contact water from the active excavation area will be conveyed by gravity or pumped from the active



excavation area to the contact water pond(s) or other BMPs when possible. For CCR excavation below the lined pond invert, Dominion Energy will install sumps or other BMPs in each active excavation area to convey the contact water from the active excavation area to the contact water pond(s).

Dewatering of the active excavation area will also be provided to maintain safe water levels and facilitate dry excavation of the CCR material. Dominion Energy will perform dewatering and control water infiltration into the excavation area by utilizing a variety of means and methods, including rim ditching, well point systems, and installation of a low permeability cut-off wall. The cut-off wall will be installed below a seam of high transmissivity soils to limit the amount of groundwater entering the excavation area and promote *in situ* dewatering. The cut-off wall may intercept small ash deposits during installation and integrate and encapsulate them within the cementitious matrix. It is anticipated the cut-off wall will remain in place post-closure. The TRD construction drawings are included as an appendix in the Groundwater Monitoring Plan. Contact water from dewatering efforts will be conveyed to the contact water ponds or other storage location prior to being sent to the CSWTS for treatment. Dominion Energy will provide other means of storage or management of contact water (e.g. tanks) in addition to the contact water ponds, as needed, to ensure that the discharge flow does not exceed the design capacity of the CSWTS.

3.4 Erosion and Sediment and Stormwater Controls during Closure

Currently, non-contact stormwater within the LAP site sheet-flows to ditches draining to the existing stormwater/sedimentation basin in the western portion of the LAP site. Stormwater from this basin leaves the site through an existing VPDES outfall (066) under the Station's VPDES Construction Stormwater Permit. The existing ditches and stormwater/sedimentation basin will remain in place as the removal process starts and will only be removed once additional temporary or permanent measures are implemented.

Temporary sediment and erosion control measures will be utilized throughout all phases of closure activities. The existing stormwater/sedimentation basin in the western portion of the LAP site and the proposed, temporary stormwater/sedimentation basins shown on Drawing No. 006 (Erosion and Sediment Control Plan) will be the primary stormwater and erosion and sediment (E&S) control utilized during CCR excavation and removal. Stormwater will be conveyed to the sedimentation basins by existing drainage ditches, temporary stormwater diversion berms, and/or stormwater pumping operations. The existing LAP perimeter dam will also provide stormwater/flood control for the site, as it will be maintained at its existing



condition throughout the CCR excavation and removal process.

Additional E&S controls to be installed during LAP closure activities include but are not limited to dual bay truck washes, super silt fence, and a Flexible Growth Medium (FGM) or equivalent lining for slope stabilization. Details on potential E&S controls to be installed are provided on Drawings No. 006 and 011 in Attachment III of this Permit Application package. Design calculations for the E&S and stormwater controls during closure are provided in Appendix C.

4.0 CLOSURE TIMEFRAMES

Dominion has elected to excavate Energy is closing the LAP by excavating and remove removing all CCR material from the LAP for disposal in the FFCP Management Facility or an offsite permitted landfill, or for beneficial reuse offsite. It is anticipated that the LAP closure activities may take approximately 13 years to complete once started.

The projected timeframes for closure activities are provided in Table 4-1 below.

Table 4-1 Projected LAP Closure Timeline

Activity	Tentative Date
Commencement of CCR Removal/Closure Activities – LAP	2 nd Quarter 2021
Completion of Closure (CCR Removal) - LAP	NLT March 2034

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 Energy will prepare a notification of closure of the LAP within 30 days of completion of closure and will 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 the LAP will involve removing accumulated CCR such that no residual materials remain visible, followed by over-excavating the removal footprint by a minimum of six

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Lower Ash Pond (LAP) Chesterfield
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(6) inches. Removed CCR material will be transferred to the FFCP Management Facility or, an offsite

permitted landfill, or beneficially reused to the onsite Beneficial Use Building prior to transportation offsite for beneficial reuse. To facilitate effective management of stormwater and contact water, closure by removal of areas within the LAP will be achieved in phases. The phased closures will be sequenced as necessary to support traffic patterns and other constraints, including the management of stormwater and contact water during a 100-year, 24-hour design storm event. A phased approach will also allow for documentation of certified clean areas within the excavation area that are approved for soil backfill.

Temporary CCR excavation slopes will not exceed 5H:1V.

In environmentally-sensitive areas outside of the defined CCR unit boundary, such as Resource Protection Areas (RPAs), groundwater monitoring well locations, or wetlands, a modified excavation protocol will be followed for removal of identified CCR. The CCR will be removed to a visually clean condition using methods that minimize impact to surrounding soils. The 6-inch over-excavation will not be performed in these areas in order to limit the impact to subgrade soils. Following CCR removal, the area will be stabilized to prevent erosion with materials suitable for the area.

Interim soil cover and vegetation (or approved equal) will be installed over excavation slopes. Water levels in the excavation area will be maintained at least 5-feet below the deepest excavation adjacent to the slope.

After CCR removal and certification, the LAP will be graded to promote stormwater drainage to the site's permitted stormwater outfalls. Vegetative stabilization will be established to prevent erosion. The area will be maintained as a grassy open area.

5.2 Sampling and Testing Program

After removal of the CCR material and the 6-inch over-excavation material from the LAP, the area will be visually inspected to verify the CCR removal and over-excavation has been achieved. In addition, the LAP will be further inspected by targeted soil cores, dug by hand using a hand auger or similar tool, to a depth of at least six (6) inches at a frequency of at least one core per acre.

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

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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 VSWMR.

5.3 Other Areas

A 10-inch diameter water main and a fiber optic cable currently run beneath Coxendale Road and Henricus Park Road along the northern and eastern boundaries of the LAP. It is possible that CCR material may be found beneath the pavement or that the existing utilities may be located within the limits of CCR. If this occurs, Dominion Energy will expose the utility by hand-digging, ensure the utility is appropriately supported, and carefully remove any CCR material in the vicinity of the utility within the waste unit boundary.

Several utility poles with overhead utilities in the eastern and southern portion of the LAP closure area (along Henricus Park Road) will need to be relocated by others prior to closure activities. Dominion will-over-excavate and remove the pole foundations for offsite disposal.

6.0 FINAL CLOSURE AND POST-CLOSURE IMPLEMENTATION

6.1 Post-Closure Stormwater Controls

The LAP post-closure stormwater controls are shown on Drawing No. 005 (Final Grading Plan) in Attachment III of this Permit Application package. A concrete perimeter drainage ditch will be constructed around the LAP, and a concrete stormwater ditch will be constructed along Coxendale Road and Henricus Park Road, to convey stormwater runoff from the closure area to proposed stormwater outfalls in the closure area. The western stormwater outfalls will discharge to the Station's Thermal Channel to the west. The eastern stormwater outfalls will discharge to Aiken Swamp in the Dutch Gap Conservation Area. A gravel-surfaced perimeter access road will also be constructed around the LAP closure area. Design calculations for the post-closure stormwater controls are included in Appendix C.

6.2 Dam Modification



<u>Closure Plan (Rev. 1)</u> <u>Lower Ash Pond (LAP) Chesterfield</u> <u>Power Station Chesterfield County,</u> <u>Virginia</u>

Dominion <u>Energy</u> will request approval to lower and then decommission the existing dam around the western, southern, and eastern sides of the LAP closure area. Plans and details for the proposed dam modification are provided on Drawing Nos. 012 and 013 in Attachment III of this Permit Application package. Therefore, once the LAP is closed, the LAP will no longer be regulated as an impounding structure by DCR.

6.3 Sign Posting

A gate will be installed at the entrance to the ponds on Coxendale Road at the conclusion of closure activities. The existing fence along Coxendale Road, Henricus Park Road, and the Henricus Park Hiking Trail will remain on the downstream sides of the LAP. The fence along the upstream sides will be removed during closure construction and will be re-set at the completion of closure activities. A sign will be posted at the site entrance notifying all persons of the final closure of the LAP and the prohibition against further receipt of CCR.

As the LAP is closing by removal, there is no requirement to post a sign prohibiting further disposal of waste as indicated in 9VAC20-81-160 D(5)(a).

6.4 Land Instruments

As the LAP is closing by removal, there is no requirement to submit a survey plat to the local land recording authority under 9VAC20-81-160 D(5)(b) or record a notation to the deed under 9VAC20-81-160 D(5)(c) and 40 CFR §257.102(i).

6.46.5 Certification

Upon Within 30 days of closure completion of closure construction, under 40 CFR §257.102(c), a certification statement signed by a Professional Engineer registered in the Commonwealth of Virginia will be placed in the LAP unit operating record and submitted to VADEQ along with the documentation from the Sampling and Testing Program.posted on Dominion Energy's publicly accessible website. The certification statement will should generally read as follows:

66

I certify that the closure of the [Pond] at the Chesterfield Power Station has been completed in accordance with the Closure Plan dated [DATE] for [Date on the Closure Plan or most recent amendment] and the requirements of 40 CFR §257.102(c).

Within 30 days of closure completion under the Unit's Virginia Solid Waste Facility Permit No. XXX issued



<u>Closure Plan (Rev. 1)</u> <u>Lower Ash Pond (LAP) Chesterfield</u> <u>Power Station Chesterfield County,</u> <u>Virginia</u>

to the Dominion Chesterfield Power Station(SWP 619) a certification statement by a Professional Engineer licensed in the Commonwealth of Virginia will be provided to the DEQ along with supporting documentation as required by this Plan. The certification statement should generally read as follows:

I certify that closure of the [Pond] at the Chesterfield Power Station has been completed in accordance with the Closure Plan [Date on the Closure Plan or most recent amendment] for solid waste permit number 619 issued to Dominion Energy, with the exception of the following discrepancies: TBD[To Be Determined]

In addition, a sign was 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]

The certification will be posted on Dominion Energy's publicly accessible internet site and placed in the operating record.

6.56.6 Post-Closure Use

Currently, there are no dedicated proposed land use plans for this area. A gravel-surfaced perimeter access road will be constructed around the LAP closure area. The former LAP area will be allowed to revegetate and return to agrassya grassy open area.

7.0 CLOSURE COST ESTIMATE

The LAP closure cost estimate is estimated to be approximately \$204,000,000. The estimate includes the cost of all closure construction activities, as well as costs for inspection, testing, and certification as proposed in this Plan. See Appendix D for the Closure Cost Estimate.



SURFACE IMPOUNDMENT CLOSURE PLAN (REV. 12) UPPER ASH POND CHESTERFIELD POWER STATION CHESTERFIELD COUNTY, VIRGINIA

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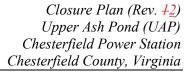


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1.0 PLAN CERTIFICATION

This Closure Plan for the Upper Ash Pond (UAP) at the Chesterfield Power Station was prepared by AECOM. The document and Certification/Statement of Professional Opinion are based on and limited to information that AECOM has relied on from Dominion Energy and others, but not independently verified, as well as work products produced by AECOM.

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).

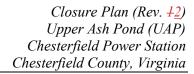
The use of the word "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion and is not and shall not be interpreted or construed as a guarantee, warranty, or legal opinion.

-Gabriel Lang

STEPHEN C WALKER S Lic. No. 0402067705

Stephen Walker

Printed Name of Professional Engineer





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Commonwealth of Virginia License No.	Signature and Date

Commonwealth of Virginia License No.

2.0 INTRODUCTION

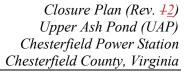
Virginia Electric and Power Company d/b/a Dominion Energy Virginia (Dominion Energy) owns and operates the Chesterfield Power Station (Station) located at 500 Coxendale Road in Chesterfield County, Virginia. The Station includes two Coal Combustion Residuals (CCR) surface impoundments, as well as a Fossil Fuel Combustion Products (FFCP) Management Facility operating under Virginia Department of Environmental Quality (VADEQ) Solid Waste Facility Permit No. 609, issued on June 29, 2016.

This Closure Plan was prepared for one of the Station's CCR surface impoundments, the Upper Ash Pond (UAP), and describes the design for closure of the UAP. A separate Closure Plan is being submitted for the other CCR surface impoundment, the Lower Ash Pond (LAP). This Closure Plan is being submitted to VADEQ as part of a Part B Solid Waste Closure Permit Application (Permit Application). This Closure Plan was prepared in accordance with 40 CFR 257, Subpart D and is consistent with the requirements of 40 CFR 257.102 for closure of CCR surface impoundments and 9 VAC 20-81-800 of the Virginia Solid Waste Management Regulations (VSWMR). The UAP will be closed by removal pursuant to 40 CFR 257.102(c) and § 10.1-1402.03 of the Code of Virginia.

2.1 **General UAP Information**

As noted previously, there are three CCR units at the Station, the UAP, the LAP, and the FFCP Management Facility. This Closure Plan is for the UAP only. The UAP is a surface impoundment that was used by the Station to store CCR material. The UAP is currently regulated under the following permits:

VADEQ Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VA0004146



 Virginia Department of Conservation and Recreation (DCR) Operation and Maintenance Certification, Inventory No. 04145

Groundwater monitoring for the UAP will transition from the VPDES permit to DEQ solid waste permit upon issuance.

The UAP is approximately 113 acres in size. The estimated volume of CCR material in the UAP is approximately 11.8 million cubic yards (MCY). The UAP is constructed of earthen dikes, with a 20-foot minimum crest width at approximate elevation of 40 feet above mean sea level (MSL). The estimated bottom of CCR material grades in the UAP are presented on Drawing No. 004 (Estimated Bottom of CCR Material Plan). The maximum bottom elevation level of CCR material in the UAP is estimated to be minus 12 feet below MSL. The estimated area of disturbance to complete the UAP closure activities is 140 acres.

3.0 CLOSURE IMPLEMENTATION

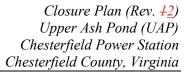
3.1 Overview of Closure Approach

This Closure Plan provides for the closure of the UAP by removal of the CCR material. Closure is considered complete under 40 CFR 257.102 and 9 VAC 20-81-810(c) of the CCR Rule when:

- A Professional Engineer licensed in the Commonwealth of Virginia certifies all CCR removal and decontamination, i.e., constituent concentration removal, throughout the CCR unit and any areas affected by releases from the CCR unit; and,
- 2. Groundwater monitoring concentrations do not exceed the groundwater protection standards established pursuant to 40 CFR §257.95(h) for constituents listed in Appendix IV of the CCR Rule.

Closure is considered complete under the Unit's Virginia Solid Waste Permit, SWP 619, upon issuance when:

1. A Professional Engineer licensed in the Commonwealth of Virginia certifies CCR has been removed from the UAP. In addition, consistent with its other closure by removal projects,





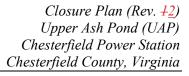
Dominion will also over-excavate the visually clean certified CCR unit and the area within the CCR unit has been over-excavated by a minimum of six (approximately 6) inches of underlying material.; and,

2. The <u>UAP'sCCR unit's</u> downgradient <u>groundwater</u> monitoring wells do not exhibit levels in excess of a maximum contaminant limit (MCL) or established groundwater protection standard for any CCR <u>Rule Appendix IV</u> constituent on or after a minimum of ten sampling events have occurred after CCR material has been verified as removed by a Professional Engineer <u>inlicensed in the Commonwealth of Virginia</u>.

There is approximately 11.8 MCY of CCR material to be excavated and removed from the UAP. All CCR material removed from the UAP will be relocated to the <u>Station's</u> FFCP Management Facility—or, <u>transported to</u> an offsite permitted industrial waste landfill for disposal, or beneficially reused offsite. The expected storage capacity of the FFCP Management Facility is 9.36 MCY for excavated ash as well as production CCR material <u>anticipated from ongoing and futureremaining at the</u> Station—operations. A combination of fill material generated from future onsite activities at the Chesterfield Power Station and soil imported from offsite will be used as backfill material to complete the UAP closure and site restoration activities.

Dominion Energy is proposing a phased excavation and removal plans for the purposes of managing stormwater and CCR contact water. Once the CCR material has been removed and the UAP backfilled with soil, the UAP will be graded to promote stormwater drainage and seeded to establish cover vegetation. The final closure grades are shown on Drawing No. 005 (Final Grading Plan); profiles of the final closure grades are shown on Drawing Nos. 007 through 009 and details are provided on Drawing No. 010. The final closure grades will be established at an elevation between 10 and 23 feet above MSL around the perimeter, and then graded at 0.5% minimum upwards towards the northern portion of the pond to approximate elevation 23 feet above MSL. The closure area will consist of the following from top to bottom:

- Minimum 1-foot vegetative soil layer;
- Approximately 3-feet of low permeability fill soil (k < 1 x 10-5 cm/sec); and,



• Compacted fill soil, at least 6 inches below the bottom elevation of the CCR material.

<u>Dominion's Dominion Energy's</u> Construction Quality Assurance (CQA) representative will perform field compaction testing of the compacted, <u>low permeability</u>, and structural fill soil to verify conformance with the compaction standards.

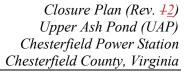
After vegetative soil layer placement is completed, Dominion will apply seed, fertilizer, lime, and mulch, in accordance with the VADEQ Erosion & Sediment Control Handbook (VESCH), to achieve a permanent vegetative cover over the closure area.

3.2 CCR Transportation Plan

Dominion Energy is planning to haul the excavated CCR from the UAP to the Station's FFCP Management Facility or to a beneficial use loadout facility on Dominion Energy property located to the northwest of the current pond locations. This Material movement will require a rotation of trucks for CCR hauling to circulate between the UAP, the FFCP Management Facility, and the beneficial use facility for an extended duration until the project is complete. The hauling route for trucks between the UAP, the FFCP Management Facility, and the beneficial use facility involves adding truck traffic associated with the project to public roadways. Therefore, a traffic impact analysis (TIA) was performed to determine if any potential significant impacts to the existing public roadway network or projected traffic operations would result from the proposed project. A copy of the TIA is provided in Appendix A.

3.3 Contact Water Management and Treatment

Dominion <u>Energy</u> will ensure that contact water, including water from dewatering efforts, and any other non-stormwater flows are <u>keptmaintained</u> separate from <u>non-contact</u> stormwater at all times during closure activities. Contact water and any other non-stormwater flows will require treatment prior to discharge. A Centralized Source Water Treatment System (CSWTS) <u>will behas been</u> constructed onsite for wastewater treatment. A Concept Engineering Report (CER) for the CSWTS was submitted to the VADEQ Water Division under the Station's existing VPDES permit and was approved by the Water Division on September





16, 2020. Treated effluent discharged from the CSWTS will meet all applicable requirements in the VPDES permit. The CSWTS is currently in operation.

For each phase of CCR excavation and removal, Dominion Energy will install Best Management Practices (BMPs), such as lined contact water ponds, for the management of the contact water generated during CCR material excavation. Contact water ponds will be sized to contain the runoff volume from a 100-year, 24-hour storm event for the contributing drainage area (see Appendix B for calculations). Contact water ponds will be lined with 40-mil linear low-density polyethylene (LLDPE), and the liner will be anchored around the entire perimeter top of the contact water pond. For each phase, Dominion Energy will convey the contact water from the contact water pond(s) or other BMPs to a connection on the CSWTS influent pipe.

Contact water from the active excavation area will be conveyed by gravity or pumped from the active excavation area to the contact water pond(s) or other BMPs when possible. For CCR excavation below the lined pond invert, Dominion Energy will construct sumps or other BMPs in each active excavation area to convey the contact water from the active excavation area to the contact water pond(s).

Dewatering of the active excavation area will also be provided to maintain safe water levels and facilitate dry excavation of the CCR material. Contact water from dewatering efforts will be conveyed to the contact water ponds or other storage location prior to being sent to the CSWTS for treatment. Dominion Energy will provide other means of storage or management of contact water (e.g. tanks) in addition to the contact water ponds, as needed, to ensure that the discharge flow does not exceed the design capacity of the CSWTS.

3.4 Erosion and Sediment and Stormwater Controls during Closure

Currently, non-contact stormwater within the UAP site sheet-flows from the top of the impoundment to the existing let-downs along the side slopes that discharge into ditches draining to the existing stormwater/sedimentation basin in the eastern portion of the UAP site. Stormwater from this basin leaves the site through an existing VPDES outfall (005) under the Station's VPDES permit. The existing ditches and stormwater/sedimentation basin will remain in place as the removal process starts and will only be removed once additional temporary or permanent measures are implemented.



Temporary sediment and erosion control measures will be utilized throughout all phases of closure activities. The existing stormwater/sedimentation basin in the eastern portion of the UAP site and the proposed, temporary stormwater/sedimentation basins shown on Drawing No. 006 (Erosion and Sediment Control Plan) will be the primary stormwater and erosion and sediment (E&S) control utilized during CCR excavation and removal. Stormwater will be conveyed to the sedimentation basins by existing drainage ditches, temporary stormwater diversion berms, and/or by stormwater pumping operations. The existing UAP perimeter dam will also provide stormwater/flood control for the site, as it will be maintained at its existing condition through the CCR excavation and removal process. Once the new sedimentation basins and outlets are operational, existing VPDES outfall 005 will be removed from service, prior to the excavation portion of this phase of work.

Additional E&S controls to be installed during UAP closure activities include but are not limited to dual bay truck washes, super silt fence, and a Flexible Growth Medium (FGM) or equivalent lining for slope stabilization. Locations and details are provided on Drawing Nos. 006 and 010 in Attachment III of the Permit Application package. Design calculations for the E&S and stormwater controls during closure are provided in Appendix C.

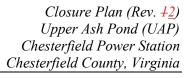
4.0 CLOSURE TIMEFRAMES

Dominion has elected to exeavate Energy is closing the UAP by excavating and removeremoving all CCR material from the UAP for disposal in the FFCP Management Facility or an offsite permitted landfill, or for beneficial reuse offsite. It is anticipated that the UAP closure activities may take approximately 13 years to complete once started.

The projected timeframes for closure activities are provided in Table 4-1 below.

Table 4-1 Projected UAP Closure Timeline

Activity	Tentative Date
Commencement of CCR Removal/Closure Activities - UAP	2 nd Quarter 2021
Completion of Closure (CCR Removal) - UAP	NLT April 2034





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 Energy will prepare a notification of closure of the UAP within 30 days of completion of closure and will place the notification in the operating record.

5.0 INVENTORY REMOVAL AND DISPOSAL

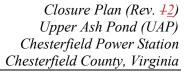
5.1 Waste Removal, Decontamination, and Disposal

The protocol for closure by removal of the UAP will involve removing accumulated CCR such that no residual materials remain visible, followed by over-excavating the removal footprint by a minimum of six (6) inches. Removed CCR material will be transferred to the FFCP Management Facility—or, an offsite permitted landfill, or beneficially reused to the onsite Beneficial Use Building prior to transportation offsite for beneficial reuse. To facilitate effective management of stormwater and contact water, closure by removal of areas within the UAP will be achieved in phases. The phased closures will be sequenced as necessary to support traffic patterns and other constraints, including the management of stormwater and contact water during a 100-year, 24-hour design storm event. A phased approach will also allow for documentation of certified clean areas within the excavation area that are approved for soil backfill. Temporary CCR excavation slopes will not exceed 5H:1V.

In environmentally-sensitive areas outside of the defined CCR unit boundary, such as Resource Protection Areas (RPAs), groundwater monitoring well locations, or wetlands, a modified excavation protocol will be followed for removal of any identified CCR. The CCR will be removed to a visually clean condition using methods that minimize impact to surrounding soils. Following CCR removal, the area will be stabilized to prevent erosion with materials suitable for the area.

Interim soil cover and vegetation (or approved equal) will be installed over excavation slopes. Water levels in the excavation area will be maintained at least 5-feet below the deepest excavation adjacent to the slope.

After CCR removal and certification, the UAP will be graded to promote stormwater drainage to the site's





permitted stormwater outfalls. Vegetative stabilization will be established to prevent erosion. The area will be maintained as a grassy open area.

5.2 Sampling and Testing Program

After removal of the CCR material and the 6-inch over-excavation material from the UAP, the area will be visually inspected to verify the CCR removal and over-excavation has been achieved. In addition, the UAP will be further inspected by targeted soil cores, dug by hand using a hand auger or similar tool, to a depth of at least six (6) inches at a frequency of at least one core per acre.

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.

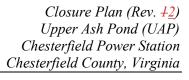
Groundwater monitoring will be conducted in accordance with the approved Groundwater Monitoring Plan to meet the closure by removal standard set forth in 40 CFR 257.102(c) and the VSWMR.

5.3 Other Areas

Aboveground and underground electric utilities currently run along the northern boundary of the UAP along Henricus Park Road. It is possible that CCR material may be found beneath the ground surface or that the existing utilities may be located within the limits of CCR in some locations. If this occurs, Dominion Energy will expose the utility by hand-digging, ensure the utility is appropriately supported, and carefully remove any CCR material in the vicinity of the utility within the waste unit boundary.

The aboveground and underground utilities will need to be relocated by others prior to closure activities.

Dominion will over-excavate and remove the pole foundations for offsite disposal.





6.0 FINAL CLOSURE AND POST-CLOSURE IMPLEMENTATION

6.1 Post-Closure Stormwater Controls

The UAP post-closure stormwater controls are shown on Drawing No. 005 (Final Grading Plan) in Attachment III of the Permit Application package. Several tied concrete block mat-lined stormwater conveyance channels will direct stormwater runoff from the closure area to proposed stormwater outfalls in the closure area. The west outlet and emergency spillway will discharge to the Dutch Gap Conservation Area. The middle (southern) and east outlets and emergency spillways will discharge to the Old Channel of the James River. Design calculations for the post-closure stormwater controls are included in Appendix C.

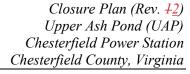
6.2 Dam Modification

Dominion <u>Energy</u> will request approval to lower and then decommission the existing dam around the western, southern, and eastern sides of the UAP closure area. Plan and details of the proposed dam modification are provided on Drawing Nos. 011 through 013 in Attachment III of the Permit Application package. Therefore, once the UAP is closed, the UAP will no longer be regulated as an impounding structure by DCR.

6.3 Sign Posting

A gate will be installed at the entrance to the ponds on Coxendale Road at the conclusion of closure activities. The existing fence along the Henricus Park Hiking Trail on the downstream (southern) side of the UAP and along the upstream (northern) side of the UAP (Henricus Park Road) will be removed during closure construction and will be re-set at the completion of closure activities. A sign will be posted at the site entrance notifying all persons of the final closure of the UAP and the prohibition against further receipt of CCR.

As the UAP is closing by removal, there is no requirement to post a sign prohibiting further disposal of waste as indicated in 9VAC20-81-160 D(5)(a).



6.4 Land Instruments

As the UAP is closing by removal, there is no requirement to submit a survey plat to the local land recording authority under 9VAC20-81-160 D(5)(b) or record a notation to the deed under 9VAC20-81-160 D(5)(c) and 40 CFR §257.102(i).

6.46.5 Certification

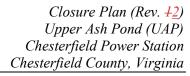
Upon Within 30 days of closure completion of closure construction, under 40 CFR §257.102(c), a certification statement signed by a Professional Engineer registered in the Commonwealth of Virginia will be placed in the UAP unit operating record and submitted to VADEQ along with the documentation from the Sampling and Testing Program. posted on Dominion Energy's publicly accessible website. The certification statement will-should generally read as follows:

"I certify that the closure of the [Pond] at the Chesterfield Power Station has been completed in accordance with the Closure Plan dated [DATE] for [Date on the Closure Plan or most recent amendment] and the requirements of 40 CFR §257.102(c).

Within 30 days of closure completion under the Unit's Virginia Solid Waste Facility—Permit No. XXX(SWP 619) a certification statement by a Professional Engineer licensed in the Commonwealth of Virginia will be provided to the DEQ along with supporting documentation as required by this Plan. The certification statement should generally read as follows:

I certify that closure of the [Pond] at the Chesterfield Power Station has been completed in accordance with the Closure Plan [Date on the Closure Plan or most recent amendment] for solid waste permit number 619 issued to Dominion Chesterfield Power Station Energy, with the exception of the following discrepancies: TBD[To Be Determined]

In addition, a sign was 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]

The certification will be posted on Dominion Energy's publicly accessible internet site and placed in the operating record.

6.56.6 Post-Closure Use

There are currently no proposed dedicated land uses for this area. A gravel-surfaced perimeter access road will be constructed around the UAP closure area. The existing Henricus Park hiking trail along the southern perimeter of the UAP will be reconstructed as needed at the completion of closure activities. The former UAP area will be allowed to revegetate and return to a grassy open area.

7.0 CLOSURE COST ESTIMATE

The UAP closure cost estimate is estimated to be approximately \$480,000,000. The estimate includes the cost of all closure construction activities, as well as costs for inspection, testing, and certification as proposed in this Closure Plan. See Appendix D for the Closure Cost Estimate.