



Keehan, Christopher <christopher.keehan@deq.virginia.gov>

SWP619 Chesterfield Power Station Closure Plans TR

1 message

Keehan, Christopher <christopher.keehan@deq.virginia.gov>

Fri, Aug 13, 2021 at 10:52 AM

To: lisa.c.messinger@dominionenergy.com

Cc: dennis.a.slade@dominionenergy.com, gabe.lang@aecom.com, Kathryn Perszyk <kathryn.perszyk@deq.virginia.gov>, Geoff Christe <geoff.christe@deq.virginia.gov>, Eric Seavey <eric.seavey@deq.virginia.gov>, Shawn Weimer <shawn.weimer@deq.virginia.gov>

Ms. Messinger,

Please see the attached technical review of the Part B application for the Closure Plans for the Upper and Lower Ash Ponds, respectively, at the above referenced facility.

--

Christopher Keehan
Solid Waste Permit Writer
Piedmont Regional Office
804-385-5570

**SWP619 TR.pdf**

256K



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE
4949-A Cox Road, Glen Allen, Virginia 23060
(804) 527-5020 FAX (804) 698-4178
www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural and Historic Resources

David K. Paylor
Director
(804) 698-4000

James Golden
Regional Director

August 13, 2021

Lisa C. Messinger
Director, Environmental Services
Dominion Energy Services, Inc.
120 Tredegar Street
Richmond, VA 23219

RE: Chesterfield Power Station (SWP 619)
Surface Impoundments Closure Plans - Upper and Lower Ash Ponds

Dear Ms. Messinger:

The Virginia Department of Environmental Quality (DEQ or Department) Piedmont Regional Office (PRO) is in receipt of a Part B permit application for the above referenced facility. The submittal was prepared on behalf of Dominion by AECOM. The submittal was received on February 5, 2021.

The submittal has been reviewed for technical adequacy and regulatory compliance in accordance with the applicable provisions of the Virginia Solid Waste Management Regulations (VSWMR) and the EPA 2015 Final Rule on the Disposal of Coal Combustion Regulations (EPA Rule). Based on the review, the current submittal appears to be technically inadequate due to the items listed below:

Please note that this facility has been assigned Solid Waste Permit Number 619. Please use this number in future submittals for this facility.

The Upper Ash Pond (UAP) and Lower Ash Pond (LAP) Closure Plans, respectively, contain the same sectional formatting. Therefore, both the UAP and LAP have been addressed in the same comment, unless otherwise specified.

1. Disclosure Statements – please address the following comments:

- DISC-02 – the forms for Robert Sauer, Shane Young, and Julie Williams-Daves are filled out incorrectly. The section Permits & Licenses should contain information for permits and licenses held by them as individuals, such as a DPOR waste management facility operator's license. Please clarify.
 - Please list Dominion Energy, Inc. as key personnel on the DISC-01 and provide a corresponding DISC-02 for Dominion Energy, Inc.
 - Please list VEPCO dba Dominion Energy Virginia as key personnel on DISC-01.
 - Please provide a DISC-02 for VEPCO dba Dominion Energy Virginia as key personnel, and list all VA/out-of-state permits.
 - DISC-02 forms for other key personnel should list any facilities at which they are also key personnel (e.g. Robert is key personnel at SWP556-Clover; Shane recently removed from Clover DISC).
2. Section 1.0, Plan Certification, UAP and LAP – please ensure that the Plan Certification is P.E. signed and certified.
 3. Section 2.1, General Information, UAP and LAP - please add Solid Waste Permit 619 (SWP 619) as regulating the UAP and LAP.
 4. Section 3.1, Overview of Closure Approach, UAP and LAP – please address the following comments:
 - This section states that, in addition to the CCR and over-excavation material being excavated and relocated to the FFCP Management Facility, or an offsite permitted industrial waste landfill for disposal, this material will be beneficially used offsite. Please discuss the project in which the CCR and over-excavation material will be beneficially used offsite.
 - This section should reference 40 CFR 257.102, and 9 VAC 20-81-370.A.3, which directs to the VSWMR Part VIII (800) requirements of the VSWMR.
 5. Section 5.1, Waste Removal, Decontamination, and Disposal, UAP and LAP – please discuss situations where, during excavation near the CCR unit boundary, the CCR material is found to extend horizontally beyond the defined unit boundary and excavation cannot continue due to other permit conditions, future construction, or property access constraints. In addition, Drawings 0008 and 0009 both show that the groundwater level is above the estimated bottom of the CCR material. It is understood that the facility will undertake dewatering efforts (Section 3.3). Please discuss how the facility will determine that the CCR's have been sufficiently dewatered so that it will be able to ensure that no residual materials remain visible, and then further excavation six-inches below that. Please describe how the groundwater will be kept from constantly infiltrating the excavation area. Please also clarify how wet CCR's from this operation will be loaded directly on the trucks for disposal - is there a moisture level that needs to be met before loading onto trucks and transport? How will this operation isolate the CCR's and any runoff from the trucks, including while loading the trucks?

6. Section 5.3, Other Areas, UAP and LAP – please include the requirement that after removal of these materials in the other areas, a Virginia-licensed professional engineer will visually inspect the area to verify that all CCR is effectively removed.
7. Section 6.4, Certification, UAP and LAP – please include reference to SWP 619.
8. Section 7.0, Closure Cost Estimates Closure Plan, Lower Ash Pond – this section states that the LAP closure cost estimate is approximately \$223,000,000. The cost estimate in Appendix D of this plan states a total closure cost estimate of \$196,596, 642. Please clarify.
9. Section 7.0, Closure Cost Estimates Closure Plan, Upper Ash Pond – this section states that the UAP closure cost estimate is approximately \$480,000,000. The cost estimate in Appendix D of this plan states a total closure cost estimate of \$367,518,631. Please clarify. In addition, Item 11B in the accompanying spreadsheet, and the drawings, reference the Ballfield. Please describe the activity that will occur at the Ballfield. Finally, please describe the on-site and off-site fill projects as described in Items 13 and 14 of the accompanying spreadsheet.

Groundwater Monitoring Plan

1. The facility's constituent list should include any inorganic constituents listed in VPDES Permit VA0004146 that are not also included in CCR Rule Appendix III, CCR Rule Appendix IV, and VSWMR Table 3.1 Column B metals.
2. Monitoring wells MW-1, MW-13, and MW-21I are listed twice in Section 4.6.1.
3. Cross Sections A-A' and C-C' in the GMP indicate fill beneath the Ballfield area. The facility is asked to indicate what material comprises the fill beneath the Ballfield area.

Processing of your Part B application will not continue until these revisions are made and submitted to DEQ.

Please note this letter should not be considered a legal opinion or a case decision as defined by the Administrative Process Act, Code of Virginia § 2.2-4000 *et seq.* If there are any questions about this letter, please contact me by telephone at (804) 385-5570 and/or by e-mail at christopher.keehan@deq.virginia.gov.

Sincerely,



Christopher Keehan
Solid Waste Permit Writer

cc: Gabriel W. Lang, P.E., AECOM
Dennis Slade, Dominion
Shawn Weimer, DEQ - Regional Land Protection Program Manager
Eric Seavey, DEQ - PRO
Kathryn Perszyk, DEQ - CO
Geoff Christie, DEQ - CO