

Carver, Beverley (DEQ)

From: Kiracofe, Brandon (DEQ)
Sent: Friday, September 23, 2016 10:19 AM
To: kenneth.roller@dom.com
Cc: Cunningham, Frederick (DEQ); Brockenbrough, Allan (DEQ); Carver, Beverley (DEQ); Thomas, Bryant (DEQ)
Subject: Procedure for Compliance with Wastewater Discharge Monitoring During Low Source Water Generation Conditions - Brema Power Station
Attachments: Low Flow Procedures.pdf

Mr. Roller,

The procedure for compliance with wastewater discharge monitoring during low source water generation conditions described in the attached document for Dominion – Brema Power Station (VPDES Permit No. VA0004138) is acceptable.

Sincerely,
Brandon Kiracofe

Brandon D. Kiracofe
Water Permits & Compliance Manager
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Harrisonburg, VA 22801
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From: Kenneth Roller (Services - 6) [<mailto:kenneth.roller@dom.com>]
Sent: Thursday, September 01, 2016 5:48 PM
To: Brockenbrough, Allan (DEQ)
Cc: Thomas, Bryant (DEQ); Kiracofe, Brandon (DEQ); Mackert, Susan (DEQ); Carver, Beverley (DEQ)
Subject: Brema and Possum Point Low-Flow Discharge and Sampling Procedures

Allan,

Attached is a request for your review and approval of proposed low-flow discharge and sampling procedures for use at the Brema and Possum Point Power Stations.

Please feel free to contact me should you have any questions about the procedures.

Thank you,

Ken Roller
Supervisor, Environmental Regulations
Dominion
Generation Environmental Services
(804) 273-3494 Office
(804) 592-7825 Cell

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VIA E-Mail

September 2, 2016

Mr. Allan Brockenbrough
Department of Environmental Quality
Office of VPDES Permits
629 East Main Street
Richmond, Virginia 23219
allan.brockenbrough@deq.virginia.gov

RE: Bremo and Possum Point Power Stations: Low-Flow Discharge and Sampling Procedure

Dear Mr. Brockenbrough:

Enclosed are proposed discharge and sampling procedures that Dominion would like to implement in order to address concerns related to lower source water flows associated with the ash pond closure projects at the Bremo and Possum Point Power Stations. We believe that these procedures are consistent with VPDES permit requirements and we ask for your approval to begin their implementation.

Please contact Ken Roller at (804) 273-3494 or kenneth.roller@dom.com should you have any questions concerning this submittal.

Sincerely,

A handwritten signature in black ink that reads "Paula A. Hamel".

Paula A. Hamel
Director, Generation Environmental Services

Attachment: *Proposed Procedure for Compliance with Wastewater Discharge Monitoring Requirements during Low Source Water Generation Conditions*

ec: Bryant.Thomas@deq.virginia.gov
Brandon.Kiracofe@deq.virginia.gov
Susan.Mackert@deq.virginia.gov
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Dominion Ash Pond Closure Project

Proposed Procedure for Compliance with Wastewater Discharge Monitoring Requirements during Low Source Water Generation Conditions

As the ash pond closure projects at the Bremo and Possum Point Power Stations progress, the type of source water treated on a daily basis will shift from predominately “decant” water to “dewatering and contact stormwater.” This shift in source water type will result in a substantial decrease in the amount of source water to be treated and discharged by each project. For example, at Bremo, the surface (decant) water in the North Ash Pond has been almost completely removed and, as a result, the amount of influent to the Centralized Source Water Treatment System has dropped from 1,000 gallons per minute (gpm) to approximately 200 gpm. The reduction in source water inflow has resulted in a need to obtain clarification on how to address the following discharge monitoring requirements:

- Collection of 24-hour composite samples for use in acute and chronic WET testing
- 3/week sampling requirements as well as the ability to collect three samples over a 7-day period for conducting the monthly chronic WET tests during reduced source water inflow.

The following proposed discharge and sampling procedures were developed to ensure compliance with the permit and provide some flexibility relative to permit monitoring requirements.

Discharge:

- It is our understanding that the permits do not require us to discharge for 3 days during any given week. Even so, Dominion will attempt to schedule discharges such that there are at least three discharges during a given week, and the discharges are staggered to allow 48 hours between collection of samples to satisfy the 3/week monitoring requirement and WET testing requirements.
- In situations where we are unable to discharge three times during a given week, we will report days without discharge as “no discharge” on the weekly monitoring report.

Sampling

- Given system constraints, it may not be practical (or even possible) to discharge for 24 consecutive hours in order to collect 24-hour composite samples for use in the acute and chronic WET tests. In such cases, a representative 24-hour flow-proportioned sample will be prepared using samples collected over the actual period of discharge during the 24-hour sampling period.
- It may be that there will not be enough water during a given month to result in three discharges during any week of the month. Should this occur, Dominion will be unable to perform the chronic WET tests. The reduced source water volumes are not expected to impact our ability to perform acute WET testing.

- We understand that DEQ would prefer to receive analyses for up to three discharges per week even if there are not 48 hours between samples. For example, if discharges occurred on Monday and Tuesday but no other days during a given week, DEQ would like to have sample results for both the Monday and Tuesday discharges. Consequently, should there be a discharge on two consecutive days (e.g., Monday and Tuesday), compliance samples will be collected on both days if Dominion is able to anticipate there will be no other discharges during the week.